



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

July 12, 2011

Mr. Gerardo Rios  
Chief – Permits Office  
U.S. EPA - Region IX  
75 Hawthorne Street, Air 3  
San Francisco, CA 94105

**Subject: Transmittal of Final Title V Renewal Permit**

Dear Mr. Gerardo:

Enclosed is the final Title V renewal permit issued by the South Coast Air Quality Management District (AQMD) for Free Flow Packaging International, Inc. (ID 043605) located at 6195 E. Randolph Street, City of Commerce, CA 90040. The copy of the proposed permit for this facility had been submitted to EPA Region IX for 45-day review and made available for a 30-day public comment period on May 26, 2011. The AQMD did not receive any public comments on the proposed permit.

If there are specific questions on this Title V renewal permit, please contact Stephen Jiang of our Mechanical, Chemical & Public Services at (909) 396-3134. Questions on the AQMD's Title V permitting program may be referred to me at (909) 396-2662 or William Thompson, the Manager of the program, at (909) 396-2398.

Sincerely

A handwritten signature in black ink, appearing to read "Mohsen Nazemi".

Mohsen Nazemi, P.E.  
Deputy Executive Officer  
Engineering and Compliance

Enclosures

cc: Brian L. Yeh (w/o enclosures)  
William Thompson (w/o enclosures)

---

## FACILITY PERMIT TO OPERATE

---

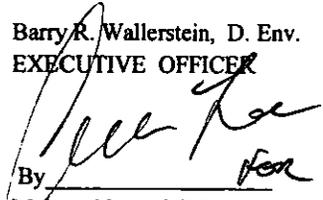
**FREE FLOW PACKAGING INTERNATIONAL, INC.  
6195 E RANDOLPH ST  
COMMERCE, CA 90040**

### NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.  
EXECUTIVE OFFICER

By   
Mohsen Nazemi, P.E.  
Deputy Executive Officer  
Engineering & Compliance

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

TABLE OF CONTENTS

Section	Description	Revision #	Date Issued
A	Facility Information	1	07/12/2011
B	RECLAIM Annual Emission Allocation	0	08/01/2002
C	Facility Plot Plan	TO BE DEVELOPED	
D	Facility Description and Equipment Specific Conditions	2	07/12/2011
E	Administrative Conditions	0	08/01/2002
F	RECLAIM Monitoring and Source Testing Requirements	0	08/01/2002
G	Recordkeeping and Reporting Requirements for RECLAIM Sources	0	08/01/2002
H	Permit To Construct and Temporary Permit to Operate	0	08/01/2002
I	Compliance Plans & Schedules	0	08/01/2002
J	Air Toxics	1	07/12/2011
K	Title V Administration	1	07/12/2011
Appendix			
A	NOx and SOx Emitting Equipment Exempt From Written Permit Pursuant to Rule 219	0	08/01/2002
B	Rule Emission Limits	2	07/12/2011

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

**SECTION A: FACILITY INFORMATION**

**LEGAL OWNER &/OR OPERATOR:** FREE FLOW PACKAGING INTERNATIONAL,  
INC.  
**LEGAL OPERATOR (if different than owner):**  
**EQUIPMENT LOCATION:** 6195 E RANDOLPH ST  
COMMERCE, CA 90040-3513  
**MAILING ADDRESS:** 1090 MILLS WAY  
REDWOOD CITY, CA 94063  
**RESPONSIBLE OFFICIAL:** JOE FODOR  
**TITLE:** VICE PRESIDENT OF MANUFACTURING  
**TELEPHONE NUMBER:** (650) 261-5350  
**CONTACT PERSON:** KEN WILLINGHAM  
**TITLE:** PLANT MANAGER  
**TELEPHONE NUMBER:** (323) 722-5112  
**TITLE V PERMIT ISSUED:** July 12, 2011  
**TITLE V PERMIT EXPIRATION DATE:** July 11, 2016

<b>TITLE V</b>	<b>RECLAIM</b>
<b>YES</b>	<b>NOx: NO</b> <b>SOx: NO</b> <b>CYCLE: 0</b> <b>ZONE: COASTAL</b>

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION**

NOT APPLICABLE



---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION C: FACILITY PLOT PLAN**

(TO BE DEVELOPED)

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**Facility Equipment and Requirements  
(Section D)**

This section consists of a table listing all permitted equipment at the facility, facility wide requirements, all individual Permits to Construct and Permits to Operate issued to various equipment at the facility, and Rule 219-exempt equipment subject to source-specific requirements. Each permit and Rule 219-exempt equipment will list operating conditions including periodic monitoring requirements, and applicable emission limits and requirements that the equipment is subject to. Also included is the rule origin and authority of each emission limit and permit condition.

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**PERMITTED EQUIPMENT LIST**

THE FOLLOWING IS A LIST OF ALL PERMITS TO CONSTRUCT AND PERMITS TO OPERATE AT THIS FACILITY:

<b>Application number</b>	<b>Permit to Operate number</b>	<b>Equipment description</b>
236175	D53160	BOILER (<5 MMBTU/HR) NAT GAS ONLY
276261	D72425	STORAGE TANK LPG
309306	F5025	AFTERBURNER HOT ROCK BED TYPE
328530	F16269	BOILER (<5 MMBTU/HR) NAT GAS ONLY
396914	F50885	POLYSTYRENE EXTRUDER
511762	GXXXXX	AFTERBURNER HOT ROCK BED TYPE

**NOTE:** EQUIPMENT LISTED ABOVE THAT HAVE NO CORRESPONDING PERMITS TO OPERATE NUMBER ARE ISSUED PERMITS TO CONSTRUCT. THE ISSUANCE OR DENIAL OF THEIR PERMITS TO OPERATE IS SUBJECT TO ENGINEERING FINAL REVIEW. ANY OTHER APPLICATIONS THAT ARE STILL BEING PROCESSED AND HAVE NOT BEEN ISSUED PERMITS TO CONSTRUCT OR PERMITS TO OPERATE WILL NOT BE FOUND IN THIS TITLE V PERMIT.

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

**FACILITY WIDE CONDITION(S)**

**Condition(s):**

1. EXCEPT FOR OPEN ABRASIVE BLASTING OPERATIONS, THE OPERATOR SHALL NOT DISCHARGE INTO THE ATMOSPHERE FROM ANY SINGLE SOURCE OF EMISSIONS WHATSOEVER ANY AIR CONTAMINANT FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR WHICH IS:
  - A. AS DARK OR DARKER IN SHADE AS THAT DESIGNATED NO. 1 ON THE RINGLEMANN CHART, AS PUBLISHED BY THE UNITED STATES BUREAU OF MINES; OR
  - B. OF SUCH OPACITY AS TO OBSCURE AN OBSERVER'S VIEW TO A DEGREE EQUAL TO OR GREATER THAN DOES SMOKE DESCRIBED IN SUBPARAGRAPH (a) OF THIS CONDITION.

[RULE 401]

2. THE TOTAL QUANTITY OF VOLATILE ORGANIC COMPOUNDS (VOC) EMISSIONS FROM THIS FACILITY SHALL NOT EXCEED 624 POUNDS IN ANY ONE DAY AVERAGED OVER 30 DAYS.  
[RULE 1303(b)(2)-OFFSET]
3. TO DEMONSTRATE COMPLIANCE WITH CONDITION NO. 2 ABOVE, THE OPERATOR SHALL CALCULATE VOC EMISSIONS FROM THIS FACILITY USING THE FOLLOWING EQUATION:

$$E_{TOTAL} = \sum E_i = \sum P_i EF_i$$

WHERE:  $E_{TOTAL}$  = TOTAL VOC EMISSIONS IN POUNDS PER DAY FROM THIS FACILITY, AVERAGED OVER 30 DAYS

$E_i$  = VOC EMISSIONS IN POUNDS PER DAY FROM EACH PROCESS, AVERAGED OVER 30 DAYS

$P_i$  = TOTAL AMOUNT OF RAW MATERIALS USED FOR EACH PROCESS, IN POUNDS PER DAY, 30-DAY ROLLING AVERAGE

$EF_i$  = VOC EMISSION FACTOR FOR EACH PROCESS, IN POUNDS VOC EMISSIONS PER POUND RAW MATERIALS USED

FOR POLYSTYRENE FOAM PACKAGING MATERIAL MANUFACTURING SYSTEM,  $EF_i$  SHALL BE 0.02377 POUNDS VOC EMISSIONS PER POUND RAW MATERIALS USED.

BASED ON THE SOURCE TEST RESULTS, THE EMISSION FACTOR FOR EACH PROCESS MAY BE ADJUSTED AND THE FACILITY PERMIT HOLDER WILL BE NOTIFIED. UPON NOTIFICATION FROM THE DISTRICT, THE ADJUSTED EMISSION FACTOR SHALL BE USED FOR THE EMISSION CALCULATIONS.

[RULE 1303(b)(2)-OFFSET]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

4. THE OPERATOR SHALL MAINTAIN ADEQUATE RECORDS TO VERIFY COMPLIANCE WITH CONDITION NO. 2, ABOVE. THE RECORDS SHALL BE MAINTAINED FOR A PERIOD OF FIVE (5) YEARS AND MADE AVAILABLE TO THE EXECUTIVE OFFICER OR HIS REPRESENTATIVE UPON REQUEST.  
[RULE 1303(b)(2)-OFFSET, RULE 3004(a)(4)-Periodic Monitoring]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**PERMIT TO OPERATE**

**Permit No. D53160  
A/N 236175**

**Equipment Description:**

BOILER, CLEAVER BROOKS, WATERTUBE TYPE, MODEL NUMBER M4 HP-700-4500, 4.5 MM BTU/HR, WITH ONE CLEAVER BROOKS NATURAL GAS BURNER, A FLUE GAS RECIRCULATION SYSTEM.

**Conditions:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.  
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THIS EQUIPMENT SHALL BE FIRED ON NATURAL GAS ONLY.  
[RULE 1303(a)(1)-BACT]
4. NITROGEN OXIDES AND CARBON MONOXIDE CONCENTRATIONS IN THE FLUE GAS SHALL NOT EXCEED 30 PPM AND 50 PPM, RESPECTIVELY, (DRY) CALCULATED AT 3 PERCENT OXYGEN.  
[RULE 1303(a)(1)-BACT]
5. THE OWNER OR OPERATOR OF THIS EQUIPMENT SHALL ARRANGE FOR A CERTIFIED BOILER TECHNICIAN TO PERFORM TWICE YEARLY BOILER TUNEUPS, ACCORDING TO THE MANUFACTURER'S SPECIFICATIONS TO ASSURE IN COMPLIANCE WITH CONDITION NO. 4 ABOVE.  
[RULE 1303(a)(1)-BACT]
6. THE OWNER OR OPERATOR OF THIS BOILER SHALL MAINTAIN ALL BOILER TUNE-UP RECORDS, AS SPECIFIED IN CONDITION NO. 5, FOR A PERIOD OF AT LEAST TWO YEARS AND MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.  
[RULE 1303(a)(1)-BACT]

**Periodic Monitoring:**

7. THE OPERATOR SHALL DETERMINE COMPLIANCE WITH THE CO EMISSION LIMIT(S) BY CONDUCTING A TEST AT LEAST ONCE EVERY FIVE YEARS USING A PORTABLE ANALYZER AND AQMD-APPROVED TEST METHOD OR, IF NOT AVAILABLE, A NON-AQMD APPROVED TEST METHOD. THE TEST SHALL BE CONDUCTED WHEN THE EQUIPMENT IS OPERATING UNDER NORMAL CONDITIONS TO DEMONSTRATE COMPLIANCE WITH RULE 1146.1 CONCENTRATION LIMIT. THE OPERATOR SHALL COMPLY WITH ALL GENERAL TESTING, REPORTING, AND RECORDKEEPING REQUIREMENTS IN SECTIONS E AND K OF THIS PERMIT.  
[RULE 3004 (a)(4)]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

8. THE OPERATOR SHALL DETERMINE COMPLIANCE WITH THE NOX EMISSION LIMIT(S) BY CONDUCTING A TEST AT LEAST ONCE EVERY FIVE YEARS USING A PORTABLE ANALYZER AND AQMD-APPROVED TEST METHOD OR, IF NOT AVAILABLE, A NON-AQMD APPROVED TEST METHOD. THE TEST SHALL BE CONDUCTED WHEN THE EQUIPMENT IS OPERATING UNDER NORMAL CONDITIONS TO DEMONSTRATE COMPLIANCE WITH RULE 1146.1 CONCENTRATION LIMIT. THE OPERATOR SHALL COMPLY WITH ALL GENERAL TESTING, REPORTING, AND RECORDKEEPING REQUIREMENTS IN SECTIONS E AND K OF THIS PERMIT.  
[RULE 3004 (a)(4)]

**Emissions And Requirements:**

9. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:
- CO: 2000 PPMV, RULE 407
  - CO: 400 PPMV, RULE 1146.1
  - PM: 0.1 GR/SCF, RULE 409
  - PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS
  - NOX: 30 PPMV, RULE 1146.1

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**PERMIT TO OPERATE**

**Permit No. D72425  
A/N 276261**

**Equipment Description:**

STORAGE TANK, ISOBUTANE/ISOPENTANE BLEND, 6'-10"DIA X 19'-3"H, 5,000-GALLON CAPACITY, PRESSURE VESSEL.

**Conditions:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.  
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THIS STORAGE TANK SHALL NOT BE FILLED UNLESS DISPLACED VAPORS ARE RETURNED TO THE TANK TRUCK.  
[RULE 1303(a)(1)-BACT]

**Periodic Monitoring:**

4. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE CLEANING LOG THAT INCLUDES STATEMENT OF THE APPROVED CLEANING METHOD.  
[RULE 3004(a)(4)]

**Emissions And Requirements:**

5. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:  
  
VOC: RULE 1171, SEE APPENDIX B FOR EMISSIONS LIMITS

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**PERMIT TO OPERATE**

**Permit No. F5025  
A/N 309306**

**Equipment Description:**

**AIR POLLUTION CONTROL SYSTEM CONSISTING OF:**

1. REGENERATIVE THERMAL OXIDIZER, SMITH ENGINEERING CO., 2,400,000 BTU/HR MAXIMUM RATING, NATURAL GAS FIRED, 9'-6"W X 29'-7"L X 12'-8"H, OVERALL DIMENSIONS WITH TWO HEAT EXCHANGER BEDS, EACH PACKED WITH 15,000 POUNDS OF CERAMIC SADDLES, AND A FLOW REVERSAL VALVE.
2. EXHAUST FAN WITH A 60-BHP BLOWER VENTING TWO EXTRUDERS, FIVE EXPANDERS, A DRYING ROOM, AND TWO INTERMEDIATE AND FINAL PRODUCT STORAGE AREAS OF THE POLYSTYRENE LOOSEFILL PROCESSES.

**Conditions:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.  
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THE OXIDIZER SHALL BE FIRED ON NATURAL GAS ONLY.  
[RULE 1303(a)(1)-BACT]
4. A STRIP-CHART RECORDER SHALL BE INSTALLED TO MEASURE AND RECORD THE TEMPERATURE IN THE COMBUSTION ZONE WHICH SHALL BE A MINIMUM OF 1450 DEGREES FAHRENHEIT. THESE RECORDS SHALL BE RETAINED FOR AT LEAST TWO YEARS AND BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.  
[RULE 1303(a)(1)-BACT]
5. THIS EQUIPMENT SHALL BE OPERATED WHENEVER THE PROCESSES IT SERVES ARE IN OPERATION FOR COMPLIANCE WITH RULE 1175.  
[RULE 1303(a)(1)-BACT]

**Periodic Monitoring:**

6. THE OPERATOR SHALL OPERATE AND MAINTAIN THIS EQUIPMENT ACCORDING TO THE FOLLOWING REQUIREMENTS:

THE COMBUSTION CHAMBER TEMPERATURE SHALL BE MAINTAINED AT A MINIMUM OF 1,450 DEGREES FAHRENHEIT WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

THE OPERATOR SHALL OPERATE AND MAINTAIN A TEMPERATURE MEASURING AND RECORDING SYSTEM TO CONTINUOUSLY MEASURE AND RECORD THE COMBUSTION CHAMBER TEMPERATURE PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN 1% OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS USING AN APPLICABLE AQMD OR EPA APPROVED METHOD.

FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN A COMBUSTION CHAMBER TEMPERATURE OF LESS THAN 1,450 DEGREES FAHRENHEIT OCCURS DURING NORMAL OPERATION OF THE EQUIPMENT IT SERVES. THE OPERATOR SHALL REVIEW THE RECORDS OF THE COMBUSTION CHAMBER TEMPERATURE ON A DAILY BASIS TO DETERMINE IF A DEVIATION OCCURS OR SHALL INSTALL AN ALARM SYSTEM TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.

WHENEVER A DEVIATION OCCURS, THE OPERATOR SHALL INSPECT THIS EQUIPMENT TO IDENTIFY THE CAUSE OF SUCH A DEVIATION, TAKE IMMEDIATE CORRECTIVE ACTION TO MAINTAIN THE COMBUSTION CHAMBER TEMPERATURE AT OR ABOVE 1,450 DEGREES FAHRENHEIT, AND KEEP RECORDS OF THE DURATION AND CAUSE (INCLUDING UNKNOWN CAUSE, IF APPLICABLE) OF THE DEVIATION AND THE CORRECTIVE ACTION TAKEN.

ALL DEVIATIONS SHALL BE REPORTED TO THE AQMD ON A SEMI-ANNUAL BASIS PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT. THE SEMI-ANNUAL MONITORING REPORT SHALL INCLUDE THE TOTAL OPERATING TIME OF THIS EQUIPMENT AND THE TOTAL ACCUMULATED DURATION OF ALL DEVIATIONS FOR EACH SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT.

THE OPERATOR SHALL SUBMIT AN APPLICATION WITH A QUALITY IMPROVEMENT PLAN (QIP) IN ACCORDANCE WITH 40 CFR PART 64.8 TO THE AQMD IF AN ACCUMULATION OF DEVIATIONS EXCEEDS 5 PERCENT DURATION OF THIS EQUIPMENT'S TOTAL OPERATING TIME FOR ANY SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT. THE REQUIRED QIP SHALL BE SUBMITTED TO THE AQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE FOR THE SEMI-ANNUAL MONITORING REPORT.

THE OPERATOR SHALL INSPECT AND MAINTAIN ALL COMPONENTS OF THIS EQUIPMENT ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS.

THE OPERATOR SHALL KEEP ADEQUATE RECORDS IN A FORMAT THAT IS ACCEPTABLE TO THE AQMD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS SPECIFIED IN THIS CONDITION AND 40 CFR PART 64.9 FOR A MINIMUM OF FIVE YEARS.

[RULE 1175; RULE 1303(A)(1)-BACT; RULE 3004(A)(4)-PERIODIC MONITORING; 40CFR PART 64]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**Emissions And Requirements:**

7. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

CO: 2000 PPMV, RULE 407  
PM: 0.1 GR/SCF, RULE 409  
PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS  
VOC: RULE 1175

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**PERMIT TO OPERATE**

**Permit No. F16269  
A/N 328530**

**Equipment Description:**

BOILER, PARKER BOILER CO., WATER TUBE, MODEL 115L, 4,830,000 BTU PER HOUR, WITH 12 PARKER BOILER CO. NATURAL GAS-FIRED, PREMIX METAL FIBER TYPE, LOW NOX BURNERS, AND A 2 H.P. ASSISTED AIR BLOWER.

**Conditions:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.  
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THIS EQUIPMENT SHALL BE FIRED ON NATURAL GAS ONLY.  
[RULE 1303(a)(1)-BACT]
4. THIS EQUIPMENT SHALL EMIT NO MORE THAN 30 PPM OF OXIDES OF NITROGEN (NOX) AND NO MORE THAN 100 PPM OF CARBON MONOXIDE (CO), MEASURED BY VOLUME ON A DRY BASIS AT 3% O<sub>2</sub>.  
[RULE 1303(a)(1)-BACT]
5. THE BURNER SHALL BE EQUIPPED WITH A CONTROL SYSTEM TO AUTOMATICALLY REGULATE COMBUSTION AIR AND FUEL AS THE BOILER LOAD VARIES. THIS AUTOMATIC CONTROL SYSTEM SHALL BE ADJUSTED AND TUNED AT LEAST TWICE A YEAR COMMENCING FROM START-UP ACCORDING TO THE MANUFACTURER'S SPECIFICATIONS TO ASSURE ITS ABILITY TO REPEAT THE SAME PERFORMANCE AT THE SAME FIRING RATE.  
[RULE 1303(a)(1)-BACT]
6. RECORDS OF SUCH ADJUSTMENT, TUNE-UP, AND CALIBRATION AS STATED IN CONDITION NUMBER 5 SHALL BE KEPT FOR AT LEAST 2 YEARS AND BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.  
[RULE 1303(a)(1)-BACT]

**Periodic Monitoring:**

7. THE OPERATOR SHALL DETERMINE COMPLIANCE WITH THE CO EMISSION LIMIT(S) BY CONDUCTING A TEST AT LEAST ONCE EVERY FIVE YEARS USING A PORTABLE ANALYZER AND AQMD-APPROVED TEST METHOD OR, IF NOT AVAILABLE, A NON-AQMD APPROVED TEST METHOD. THE TEST SHALL BE CONDUCTED WHEN THE EQUIPMENT IS OPERATING UNDER

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

NORMAL CONDITIONS TO DEMONSTRATE COMPLIANCE WITH RULE 1146.1 CONCENTRATION LIMIT. THE OPERATOR SHALL COMPLY WITH ALL GENERAL TESTING, REPORTING, AND RECORDKEEPING REQUIREMENTS IN SECTIONS E AND K OF THIS PERMIT.  
[RULE 3004 (a)(4)]

8. THE OPERATOR SHALL DETERMINE COMPLIANCE WITH THE NOX EMISSION LIMIT(S) BY CONDUCTING A TEST AT LEAST ONCE EVERY FIVE YEARS USING A PORTABLE ANALYZER AND AQMD-APPROVED TEST METHOD OR, IF NOT AVAILABLE, A NON-AQMD APPROVED TEST METHOD. THE TEST SHALL BE CONDUCTED WHEN THE EQUIPMENT IS OPERATING UNDER NORMAL CONDITIONS TO DEMONSTRATE COMPLIANCE WITH RULE 1146.1 CONCENTRATION LIMIT. THE OPERATOR SHALL COMPLY WITH ALL GENERAL TESTING, REPORTING, AND RECORDKEEPING REQUIREMENTS IN SECTIONS E AND K OF THIS PERMIT.  
[RULE 3004 (a)(4)]

**Emissions And Requirements:**

9. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:
- CO: 2000 PPMV, RULE 407
  - CO: 400 PPMV, RULE 1146.1
  - PM: 0.1 GR/SCF, RULE 409
  - PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS
  - NOX: 30 PPMV, RULE 1146.1

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**PERMIT TO OPERATE**

**Permit No. F50885  
A/N 396914**

**Equipment Description:**

**POLYSTYRENE FOAM PACKAGING MATERIAL MANUFACTURING SYSTEM CONSISTING OF:**

- A. EXTRUSION AND LOOSE-FILL PARTICLES FORMING.**
1. TWO POLYSTYRENE PELLETS RECEIVING HOPPERS, 4'-0" W. X 4'-0" L. X 3'-6" H, EACH WITH A 1-HP FEED SCREW CONVEYOR.
  2. EXTRUDER, BERLYN, WITH A 200-LB CAPACITY FEED HOPPER, A 3.5 INCH SCREW WITH A 75-HP DRIVE AND A PREHEATED POLYSTYRENE/BLOWING AGENT MIXING CHAMBER, 2'-0" W. 12'-0" L. X 4'-6" H.
  3. EXTRUDER, BERLYN, WITH A 200-LB CAPACITY FEED HOPPER, A 3.5-INCH SCREW WITH A 75-HP DRIVE AND A PREHEATED POLYSTYRENE/BLOWING AGENT MIXING CHAMBER, 2'-0" W. X 12'-0" L. X 4'-6" H.
  4. TWO EIGHT-STRAND EXPANSION STRETCH CONVEYORS, EACH 33'-0" L., WITH A DISC CRIMPER, AND AN ANTI-STATIC LIQUID BATH, 2'-0" W. X 3'-0" L. X 0'-2" D.
  5. TWO STRAND CHOPPERS, FOR CUTTING THE STRANDS INTO LOOSE-FILL PARTICLES, EACH 5 HP.
- B. FIRST LOOSE-FILL PARTICLES EXPANSION, COOLING, AND CURING.**
1. TWO PNEUMATIC CONVEYORS, PUSHER TYPE, EACH WITH A 5-HP BLOWER FOR CONVEYING LOOSE-FILL PARTICLES TO THE FIRST EXPANSION CHAMBER.
  2. TWO FIRST EXPANSION CHAMBERS, 2'-6" W. X 21'-0" L. X 5'-0" H., EACH WITH A FABRIC AND STEEL RECEIVING HOPPER, 3'-0" W. X 3'-0" L. X 8'-0" H., A STEAM INJECTION CHAMBER, 2'-3" W. X 18'-0" L. X 5'-0" H., WITH TWO CANOPY HOODS, A FRONT HOOD, 4'-3" W. X 2'-3" L. X 2'-0" H., A REAR HOOD, 4'-3" W. X 3'-10" L. X 2'-6" H., AND A SAMPLING PORT, 2'-0" W. X 1'-8" L.
  3. PNEUMATIC CONVEYOR, PUSHER TYPE, WITH A 5-HP BLOWER FOR CONVEYING LOOSE-FILL PARTICLES TO THE MONORAIL COOLING AND CURING SURGE SECTION.
  4. INTERMEDIATE STORAGE ROOM, 40'-0" W. X 63'-0" L. X 25'-0" H., COMMON WITH AIR POLLUTION CONTROL SYSTEM, WITH TWELVE INTERMEDIATE HOPPERS, FABRIC AND METAL, 16'-0" W. X 8'-0" L. X 18'-0" H.
  5. PNEUMATIC CONVEYOR, PUSHER TYPE, WITH A 5-HP BLOWER FOR CONVEYING LOOSE-FILL PARTICLES TO THE SECOND EXPANSION CHAMBER.

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

C. SECOND LOOSE-FILL PARTICLES EXPANSION AND DRYING.

1. ONE SECOND EXPANSION CHAMBER, 2'-6"W X 21'-0"L X 5'-0"H, WITH A FABRIC AND STEEL RECEIVING HOPPER, 3'-0"W X 3'-0"L X 8'-0"H, A STEAM INJECTION CHAMBER, 2'-3"W X 18'-0"L X 5'-0"H, WITH TWO CANOPY HOODS, A FRONT HOOD, 4'-3"W X 2'-3"L X 2'-3"L X 2'-0"H, A REAR HOOD, 4'-3"W X 3'-10"L X 2'-6"H, AND A SAMPLING PORT, 2'-0"W X 1'-8"L.
2. PNEUMATIC CONVEYOR, PUSHER TYPE, WITH A 7.5-HP BLOWER FOR CONVEYING LOOSE-FILL PARTICLES FROM THE SECOND EXPANSION CHAMBER TO THE MOISTURE BREAKBAG.
3. MOISTURE BREAK BAG, CLOTH FABRIC, 10'-0"W X 10'-0"L X 18'-0"H.
4. PNEUMATIC CONVEYOR, PUSHER TYPE, WITH A 5-HP BLOWER FOR CONVEYING LOOSE-FILL PARTICLES FROM THE MOISTURE BREAK BAG TO THE DRYING ROOM.
5. DRYING ROOM, COMMON WITH AIR POLLUTION CONTROL SYSTEM, WITH SIX HOLDING BINS, CLOTH FABRIC AND METAL, EACH 11'-0"W X 12'-0"L X 22'-0"H, WITH TAPERED BOTTOMS CONNECTED TO A COMMON 10-HP PNEUMATIC CONVEYOR, DISCHARGE LINE TO THE CHIP BREAK BAG IN PRODUCT STORAGE ROOM.

A. STORAGE ROOM I, COMMON WITH AIR POLLUTION CONTROL SYSTEM.

1. CHIP BREAK BAG, CLOTH FABRIC, 4'-0"W X 4'-0"L X 16'-0"H, WITH TWO CLOTH DUST COLLECTION BAGS, 2'-0"DIA X 4'-0"H, EACH EMPTYING INTO AN OPEN TOP 50-GAL PLASTIC DRUM.
2. PNEUMATIC CONVEYOR, PUSHER TYPE, WITH A 10-HP BLOWER FOR CONVEYING LOOSE-FILL PARTICLES FROM THE CHIP BREAK BAG TO THE STORAGE SILOS.
3. TEN STORAGE SILOS, FABRIC, 16'-0"W X 32'-0"L X 23'-0"H, EACH WITH TAPERED BOTTOMS, AND FOUR 0.2-HP BLOWERS FOR CONVEYING LOOSE-FILL PARTICLES TO THE DISCHARGE OF EACH SILO.
4. FOUR PNEUMATIC CONVEYORS, PUSHER TYPE, EACH WITH A 5-HP BLOWER FOR CONVEYING LOOSE-FILL PARTICLES FROM EACH OF THE TEN SILOS TO THE TRANSFER CHUTE BAGS.
5. TWO TRANSFER CHUTE BAGS, ONE 5'-0"W X 10"L X 23'-0"H AND 5'-0"W X 5'-0"L X 23'-0"H.

B. STORAGE ROOM II, COMMON WITH AIR POLLUTION CONTROL SYSTEM.

1. CHIP BREAK BAG, CLOTH FABRIC, 4'-0"W X 4'-0"L X 16'-0"H.
2. FIVE STORAGE SILOS, FABRIC, 10'-0"W X 24'-0"L X 23'-0"H, EACH WITH TAPERED BOTTOMS, AND FOUR 0.2-HP BLOWERS FOR CONVEYING LOOSE-FILL PARTICLES TO THE DISCHARGE OF EACH SILO.

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

3. TRANSFER CHUTE BAG, 5'-0"W X 5'-0"L X 23'-0"H.

**Conditions:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.  
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS IT IS VENTED TO AIR POLLUTION CONTROL EQUIPMENT WHICH IS IN FULL USE AND WHICH HAS BEEN ISSUED AN OPERATING PERMIT BY THE EXECUTIVE OFFICER.  
[RULE 1175, RULE 1303(a)(1)-BACT]
4. THIS EQUIPMENT SHALL COMPLY WITH ALL APPLICABLE REQUIREMENTS OF RULE 1175.  
[RULE 1175]
5. THE OWNER OR OPERATOR SHALL CONDUCT A SOURCE TEST OF THIS EQUIPMENT ONCE EVERY FIVE (5) YEARS TO ENSURE COMPLIANCE WITH RULE 1175. THE SOURCE TEST SHALL BE CONDUCTED IN ACCORDANCE WITH THE CONDITIONS SPECIFIED IN THE OPERATING PERMIT OF THE AIR POLLUTION CONTROL EQUIPMENT.  
[RULE 1175]
6. THE OPERATOR SHALL KEEP THE POLYSTYRENE FOAM PRODUCTS IN THE STORAGE ROOMS I AND II FOR AT LEAST 48 HOURS.  
[RULE 1175]
7. THE OPERATOR SHALL MAINTAIN A DAILY RECORD OF OPERATION OF THIS EQUIPMENT, INCLUDING BUT NOT LIMITED TO THE AMOUNT OF RAW MATERIAL PROCESSED, THE EQUIPMENT USED, AND THE TYPE OF BLOWING AGENT USED. THE RECORDS SHALL BE MAINTAINED FOR A PERIOD OF FIVE (5) YEARS AND MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.  
[RULE 1175]
8. THE OPERATOR SHALL MAINTAIN ADEQUATE RECORDS TO VERIFY COMPLIANCE WITH CONDITION NO. 6, ABOVE. THE RECORDS SHALL BE MAINTAINED FOR A PERIOD OF FIVE (5) YEARS AND MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST. THE RECORDS SHALL INCLUDE, AT A MINIMUM, THE FOLLOWING INFORMATION:
  - 1) THE DATE AND TIME WHEN POLYSTYRENE FOAM PRODUCTS ARE BEING TRANSPORTED INTO THE STORAGE BAGS IN THE STORAGE ROOMS I AND II.
  - 2) THE DATE AND TIME WHEN POLYSTYRENE FOAM PRODUCTS ARE BEING REMOVED FROM THE STORAGE BAGS IN THE STORAGE ROOMS I AND II.[RULE 1175]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**Emissions And Requirements:**

9. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 1175

PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS

PM: RULE 405, SEE APPENDIX B FOR EMISSION LIMITS

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**PERMIT TO CONSTRUCT**

**A/N 511762  
Granted as of  
January 11, 2011**

**Equipment Description:**

**AIR POLLUTION CONTROL SYSTEM CONSISTING OF:**

1. REGENERATIVE THERMAL OXIDIZER, SMITH ENGINEERING CO., MODEL NO. E1972, 9'-6"W X 29'-7"L X 12'-8"H, WITH A BURNER, MAXON CORPORATION, MODEL NO. 3" SERIES G KINEMAX, 2,400,000 BTU/HR, NATURAL GAS FIRED, WITH A 10-HP COMBUSTION AIR BLOWER AND TWO HEAT EXCHANGER BEDS, EACH PACKED WITH 15,000 POUNDS OF CERAMIC SADDLES.
2. PERMANENT TOTAL ENCLOSURE, EXTRUSION ROOM, ENCLOSING TWO EXTRUDERS, TWO FIRST EXPANDERS, ONE SECOND EXPANDER AND ONE PROCESS SCRAP GRINDER.
3. PERMANENT TOTAL ENCLOSURE, INTERMEDIATE STORAGE ROOM, ENCLOSING 12 INTERMEDIATE HOPPERS, COMMON WITH POLYSTYRENE FOAM PACKAGING MATERIAL MANUFACTURING SYSTEM.
4. PERMANENT TOTAL ENCLOSURE, DRYING ROOM, ENCLOSING SIX HOLDING BINS, COMMON WITH POLYSTYRENE FOAM PACKAGING MATERIAL MANUFACTURING SYSTEM.
5. PERMANENT TOTAL ENCLOSURE, STORAGE ROOM I, ENCLOSING ONE CHIP BREAK BAG, TEN STORAGE SILOS AND TWO TRANSFER CHUTE BAGS, COMMON WITH POLYSTYRENE FOAM PACKAGING MATERIAL MANUFACTURING SYSTEM.
6. PERMANENT TOTAL ENCLOSURE, STORAGE ROOM II, ENCLOSING ONE CHIP BREAK BAG, FIVE STORAGE SILOS AND ONE TRANSFER CHUTE BAG, COMMON WITH POLYSTYRENE FOAM PACKAGING MATERIAL MANUFACTURING SYSTEM.
7. EXHAUST SYSTEM WITH ONE 60-HP MAIN BLOWER, ONE 15-HP AND ONE 5-HP BOOSTER BLOWERS VENTING THE POLYSTYRENE FOAM PACKAGING MATERIAL MANUFACTURING SYSTEM.

**Conditions:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.  
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES OR REGULATIONS:

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

NOX, RULE 1147  
VOC CAPTURE EFFICIENCY AND VOC DESTRUCTION EFFICIENCY, RULE 1175  
[RULE 1147, RULE 1175, RULE 1303(A)(1)-BACT]

4. EFFECTIVE ON JULY 1, 2013, THE OXIDES OF NITROGEN (NOX) EMISSIONS DISCHARGED FROM THIS EQUIPMENT SHALL NOT EXCEED 60 PPMV, CALCULATED AS NO<sub>2</sub>, BY VOLUME ON A DRY BASIS AT 3% O<sub>2</sub>. FOR THE PURPOSE OF THIS CONDITION, THE EMISSION LIMIT SHALL APPLY SOLELY WHEN BURNING 100% FUEL AND NOT WHEN THE BURNER IS INCINERATING AIR TOXIC, VOCS, OR OTHER VAPORS.  
[RULE 1147]
5. THE OPERATOR SHALL INSTALL AND MAINTAIN IN SERVICE NON-RESETTING, TOTALIZING FUEL AND TIME METERS FOR THE FUEL BEING SUPPLIED TO THIS EQUIPMENT.  
[RULE 1147]
6. THIS EQUIPMENT SHALL BE MAINTAINED AND OPERATED AT A MINIMUM VOC DESTRUCTION EFFICIENCY OF 95% WHEN THE BASIC EQUIPMENT IT SERVES IS IN OPERATION.  
[RULE 1175, RULE 1303(A)(1)-BACT]
7. THE PERMANENT TOTAL ENCLOSURES SHALL BE MAINTAINED AND OPERATED IN COMPLIANCE WITH CRITERIA SPECIFIED IN EPA METHOD 204 – CRITERIA FOR AND VERIFICATION OF A PERMANENT OR TEMPORARY TOTAL ENCLOSURE, WHEN THE BASIC EQUIPMENT THEY SERVE ARE IN OPERATION.  
[RULE 1175, RULE 1303(A)(1)-BACT]
8. THE OPERATOR SHALL OPERATE AND MAINTAIN THIS EQUIPMENT ACCORDING TO THE FOLLOWING REQUIREMENTS:

THE COMBUSTION CHAMBER TEMPERATURE SHALL BE MAINTAINED AT A MINIMUM OF 1,450 DEGREES FAHRENHEIT WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.

THE OPERATOR SHALL OPERATE AND MAINTAIN A TEMPERATURE MEASURING AND RECORDING SYSTEM TO CONTINUOUSLY MEASURE AND RECORD THE COMBUSTION CHAMBER TEMPERATURE PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN 1% OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS USING AN APPLICABLE AQMD OR EPA APPROVED METHOD.

FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN A COMBUSTION CHAMBER TEMPERATURE OF LESS THAN 1,450 DEGREES FAHRENHEIT OCCURS DURING NORMAL OPERATION OF THE EQUIPMENT IT SERVES. THE OPERATOR SHALL REVIEW THE RECORDS OF THE COMBUSTION CHAMBER TEMPERATURE ON A DAILY BASIS TO DETERMINE IF A DEVIATION OCCURS OR SHALL INSTALL AN ALARM SYSTEM TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.

WHENEVER A DEVIATION OCCURS, THE OPERATOR SHALL INSPECT THIS EQUIPMENT TO IDENTIFY THE CAUSE OF SUCH A DEVIATION, TAKE IMMEDIATE CORRECTIVE ACTION TO

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

MAINTAIN THE COMBUSTION CHAMBER TEMPERATURE AT OR ABOVE 1,450 DEGREES FAHRENHEIT, AND KEEP RECORDS OF THE DURATION AND CAUSE (INCLUDING UNKNOWN CAUSE, IF APPLICABLE) OF THE DEVIATION AND THE CORRECTIVE ACTION TAKEN.

ALL DEVIATIONS SHALL BE REPORTED TO THE AQMD ON A SEMI-ANNUAL BASIS PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT. THE SEMI-ANNUAL MONITORING REPORT SHALL INCLUDE THE TOTAL OPERATING TIME OF THIS EQUIPMENT AND THE TOTAL ACCUMULATED DURATION OF ALL DEVIATIONS FOR EACH SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT.

THE OPERATOR SHALL SUBMIT AN APPLICATION WITH A QUALITY IMPROVEMENT PLAN (QIP) IN ACCORDANCE WITH 40 CFR PART 64.8 TO THE AQMD IF AN ACCUMULATION OF DEVIATIONS EXCEEDS 5 PERCENT DURATION OF THIS EQUIPMENT'S TOTAL OPERATING TIME FOR ANY SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT. THE REQUIRED QIP SHALL BE SUBMITTED TO THE AQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE FOR THE SEMI-ANNUAL MONITORING REPORT.

THE OPERATOR SHALL INSPECT AND MAINTAIN ALL COMPONENTS OF THIS EQUIPMENT ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS.

THE OPERATOR SHALL KEEP ADEQUATE RECORDS IN A FORMAT THAT IS ACCEPTABLE TO THE AQMD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS SPECIFIED IN THIS CONDITION AND 40 CFR PART 64.9 FOR A MINIMUM OF FIVE YEARS.

[RULE 1175; RULE 1303(A)(1)-BACT; RULE 3004(A)(4)-PERIODIC MONITORING; 40CFR PART 64]

9. THE OPERATOR SHALL MAINTAIN THE PERMANENT TOTAL ENCLOSURES UNDER A NEGATIVE PRESSURE OF AT LEAST 0.007 INCHES WATER COLUMN.  
[RULE 1175; RULE 1303(b)(2)-Offset]
10. THE OPERATOR SHALL INSTALL AND MAINTAIN A DIFFERENTIAL PRESSURE MONITORING DEVICE FOR EACH PERMANENT TOTAL ENCLOSURE, WHICH MONITORS THE DIFFERENTIAL PRESSURE BETWEEN THE INSIDE AND OUTSIDE OF THE PERMANENT TOTAL ENCLOSURE.  
[RULE 1175; RULE 1303(b)(2)-Offset]
11. THE OPERATOR SHALL RECORD THE DIFFERENTIAL PRESSURES BEING MONITORED DAILY. THESE RECORDS SHALL BE RETAINED FOR AT LEAST FIVE (5) YEARS AND BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.  
[RULE 1175; RULE 1303(b)(2)-Offset]

**Periodic Monitoring:**

12. THE OPERATOR OF THIS EQUIPMENT SHALL CONDUCT SOURCE TESTS IN ACCORDANCE WITH THE FOLLOWING CONDITIONS:
  - A. A SOURCE TEST SHALL BE CONDUCTED ONCE EVERY FIVE YEARS. THE FIRST SOURCE TEST SHALL BE CONDUCTED WITHIN 180 DAYS AFTER THE CONSTRUCTION OF THE

---

## FACILITY PERMIT TO OPERATE FREE FLOW PACKAGING INTERNATIONAL, INC.

---

PERMANENT ENCLOSURES ARE COMPLETED, UNLESS OTHERWISE APPROVED IN WRITING BY THE EXECUTIVE OFFICER.

- B. THE SOURCE TEST SHALL BE PERFORMED TO VERIFY COMPLIANCE WITH USEPA METHOD 204—CRITERIA FOR AND VERIFICATION OF A PERMANENT OR TEMPORARY TOTAL ENCLOSURE.
- C. THE SOURCE TEST SHALL BE PERFORMED TO VERIFY COMPLIANCE WITH THE VOC DESTRUCTION EFFICIENCY SPECIFIED BY CONDITION NO. 6, ABOVE, USING THE TEST METHODS SPECIFIED IN RULE 1175.
- D. THE SOURCE TEST SHALL BE PERFORMED TO VERIFY THE VOC EMISSION FACTOR FOR POLYSTYRENE FOAM PACKAGING MATERIAL MANUFACTURING SYSTEM, WHICH IS SPECIFIED BY THE FACILITY-WIDE CONDITIONS, USING THE TEST METHODS SPECIFIED IN RULE 1175.
- E. THE SOURCE TEST SHALL BE CONDUCTED WHILE THE BASIC EQUIPMENT IS OPERATING WITH THE MAXIMUM AVAILABLE INITIAL BLOWING AGENT CONTENT.
- F. THE OPERATOR SHALL PROVIDE TO THE DISTRICT A SOURCE TEST REPORT CONTAINING, AT A MINIMUM, THE FOLLOWING INFORMATION:
  - 1) VOC EMISSIONS AT INLET AND OUTLET OF THE RTO SIMULTANEOUSLY, IN PPMV AND LBS/HR,
  - 2) VOC DESTRUCTION EFFICIENCY, IN PERCENT,
  - 3) FLOW RATE, IN ACTUAL AND STANDARD CUBIC FEET PER MINUTE (ACFM AND SCFM),
  - 4) RTO COMBUSTION CHAMBER TEMPERATURE, IN DEGREE FAHRENHEIT,
  - 5) TOTAL RAW MATERIAL PROCESS WEIGHT, IN POUNDS PER HOUR,
  - 6) LOOSE FILL PRODUCTION RATE, IN POUNDS PER HOUR,
  - 7) RAW MATERIAL BLOWING AGENT CONCENTRATION, IN PERCENT BY WEIGHT,
  - 8) PRODUCT BLOWING AGENT CONCENTRATION, IN PERCENT BY WEIGHT,
  - 9) FACIAL VELOCITIES AT ALL NATURAL DRAFT OPENINGS OF THIS EQUIPMENT, IN FEET PER MINUTE (FPM), AND
  - 10) DIFFERENTIAL PRESSURES OF ALL PERMANENT TOTAL ENCLOSURES, IN INCHES WATER COLUMN.
- G. NOTWITHSTANDING THE SOURCE TEST REQUIREMENTS OF SECTION E OF THIS FACILITY PERMIT, THE FACILITY PERMIT HOLDER SHALL SUBMIT THE PROTOCOL TO THE AQMD ENGINEER AT LEAST 365 DAYS PRIOR TO THE EXPIRATION DATE OF THIS TITLE V FACILITY PERMIT UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT, AND NOTIFY THE DISTRICT OF THE DATE AND TIME OF THE TEST AT LEAST 10 DAYS PRIOR TO THE TEST.
- H. THE TEST SHALL BE CONDUCTED AT LEAST 180 DAYS PRIOR TO THE EXPIRATION DATE OF THIS TITLE V FACILITY PERMIT UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.
- I. SOURCE TEST SHALL BE CONDUCTED IN ACCORDANCE WITH THE EQUIPMENT CONFIGURATION AND OPERATION SPECIFIED IN THE TEST PROTOCOL APPROVED IN WRITING BY THE DISTRICT.

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

- J. THE SOURCE TEST SHALL BE CONDUCTED WHEN THIS EQUIPMENT IS OPERATING AT A TEMPERATURE OF NOT LESS THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT. IF THE OPERATING TEMPERATURE DURING THE SOURCE TEST IS GREATER THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT, THE MINIMUM OPERATING TEMPERATURE MAY BE INCREASED TO REFLECT THE OPERATING TEMPERATURE DURING THE SOURCE TEST.
- K. NOTWITHSTANDING THE REQUIREMENTS OF SECTION E CONDITIONS, THE SOURCE TEST RESULTS SHALL BE SUBMITTED TO THE DISTRICT NO LATER THAN 60 DAYS AFTER THE SOURCE TEST WAS CONDUCTED.
- L. THE SOURCE TEST SHALL BE CONDUCTED ACCORDING TO A DISTRICT APPROVED PROTOCOL.

[RULE 1175, RULE 1303(a)(1)-BACT, RULE 3004(a)(4)-Periodic Monitoring]

**Emissions And Requirements:**

13. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

CO: 2000 PPMV, RULE 407  
PM: 0.1 GR/SCF, RULE 409  
PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS  
NOX: RULE 1147  
VOC: RULE 1175

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**RULE 219 EQUIPMENT**

**Equipment Description:**

RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS.

**Periodic Monitoring:**

1. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

FOR ARCHITECTURAL APPLICATIONS WHERE NO THINNERS, REDUCERS, OR OTHER VOC CONTAINING MATERIALS ARE ADDED, MAINTAIN SEMI-ANNUAL RECORDS OF ALL COATINGS CONSISTING OF:

- A. COATING TYPE,
- B. VOC CONTENT AS SUPPLIED IN GRAMS PER LITER (g/l) OF MATERIALS FOR LOW-SOLIDS COATINGS,
- C. VOC CONTENT AS SUPPLIED IN g/l OF COATING, LESS WATER AND EXEMPT SOLVENT, FOR OTHER COATING.

FOR OTHER ARCHITECTURAL APPLICATIONS WHERE THINNERS, REDUCERS, OR OTHER VOC CONTAINING MATERIALS ARE ADDED, MAINTAIN DAILY RECORDS FOR EACH COATING CONSISTING OF:

- A. COATING TYPE,
- B. VOC CONTENT AS APPLIED IN GRAMS PER LITER (g/l) OF MATERIALS USED FOR LOW-SOLIDS COATINGS,
- C. VOC CONTENT AS APPLIED IN g/l OF COATING, LESS WATER AND EXEMPT SOLVENT, FOR OTHER COATING.

[RULE 3004 (a) (4)]

**Emissions And Requirements:**

2. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATION:

VOC: RULE 1113, SEE APPENDIX B FOR EMISSION LIMITS  
VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**RULE 219 EQUIPMENT**

**Equipment Description:**

RULE 219 EXEMPT EQUIPMENT, HAND WIPING OPERATIONS.

**Emissions And Requirements:**

1. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATION:

VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
21865 Copley Drive, Diamond Bar, CA 91765



---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION E: ADMINISTRATIVE CONDITIONS**

The operating conditions in this section shall apply to all permitted equipment at this facility unless superseded by condition(s) listed elsewhere in this permit.

1. The permit shall remain effective unless this permit is suspended, revoked, modified, reissued, denied, or it is expired for nonpayment of permit processing or annual operating fees. [201, 203, 209, 301]
  - a. The permit must be renewed annually by paying annual operating fees, and the permit shall expire if annual operating fees are not paid pursuant to requirements of Rule 301(d). [301(d)]
  - b. The Permit to Construct listed in Section H shall expire one year from the Permit to Construct issuance date, unless a Permit to Construct extension has been granted by the Executive Officer or unless the equipment has been constructed and the operator has notified the Executive Officer prior to the operation of the equipment, in which case the Permit to Construct serves as a temporary Permit to Operate. [202, 205]
  - c. The Title V permit shall expire as specified under Section K of the Title V permit. The permit expiration date of the Title V facility permit does not supercede the requirements of Rule 205. [205, 3004]
2. The operator shall maintain all equipment in such a manner that ensures proper operation of the equipment. [204]
3. This permit does not authorize the emissions of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules and Regulations of the AQMD. This permit cannot be considered as permission to violate existing laws, ordinances, regulations, or statues of other governmental agencies. [204]
4. The operator shall not use equipment identified in this facility permit as being connected to air pollution control equipment unless they are so vented to the identified air pollution control equipment which is in full use and which has been included in this permit. [204]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION E: ADMINISTRATIVE CONDITIONS**

5. The operator shall not use any equipment having air pollution control device(s) incorporated within the equipment unless the air pollution control device is in full operation. [204]
6. The operator shall maintain records to demonstrate compliance with rules or permit conditions that limit equipment operating parameters, or the type or quantity of material processed. These records shall be made available to AQMD personnel upon request and be maintained for at least five years. [204]
7. The operator shall maintain and operate all equipment to ensure compliance with all emission limits as specified in this facility permit. Compliance with emission limits shall be determined according to the following specifications, unless otherwise specified by AQMD rules or permit conditions: [204]
  - a. For internal combustion engines and gas turbines, measured concentrations shall be corrected to 15 percent stack-gas oxygen content on a dry basis and be averaged over a period of 15 consecutive minutes; [1110.2, 1134]
  - b. For other combustion devices, measured concentrations shall be corrected to 3 percent stack-gas oxygen content on a dry basis and be averaged over a period of 15 consecutive minutes; [1146, 1146.1, 204]
  - c. For non-combustion sources, compliance with emission limits shall be determined and averaged over a period of 60 minutes; [204]
  - d. For the purpose of determining compliance with Rule 407, carbon monoxide (CO) shall be measured on a dry basis and be averaged over 15 consecutive minutes, and sulfur compounds which would exist as liquid or gas at standard conditions shall be calculated as sulfur dioxide (SO<sub>2</sub>) and be averaged over 15 consecutive minutes; [407]
  - e. For the purpose of determining compliance with Rule 409, combustion contaminant emission measurements shall be corrected to 12 percent of carbon dioxide (CO<sub>2</sub>) at standard conditions and averaged over a minimum of 15 consecutive minutes. [409]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION E: ADMINISTRATIVE CONDITIONS**

- f. For the purpose of determining compliance with Rule 475, combustion contaminant emission measurements shall be corrected to 3 percent of oxygen (O<sub>2</sub>) at standard conditions and averaged over 15 consecutive minutes or any other averaging time specified by the Executive Officer. [475]
8. The operator shall, when a source test is required by AQMD, provide a source test protocol to AQMD no later than 60 days before the proposed test date. The test shall not commence until the protocol is approved by AQMD. The test protocol shall contain the following information: [204, 304]
- a. Brief description of the equipment tested.
  - b. Brief process description, including maximum and normal operating temperatures, pressures, throughput, etc.
  - c. Operating conditions under which the test will be performed.
  - d. Method of measuring operating parameters, such as fuel rate and process weight. Process schematic diagram showing the ports and sampling locations, including the dimensions of the ducts and stacks at the sampling locations, and distances of flow disturbances, (e.g. elbows, tees, fans, dampers) from the sampling locations (upstream and downstream).
  - e. Brief description of sampling and analytical methods used to measure each pollutant, temperature, flow rates, and moisture.
  - f. Description of calibration and quality assurance procedures.
  - g. Determination that the testing laboratory qualifies as an "independent testing laboratory" under Rule 304 (conflict of interest).
9. The operator shall submit a report no later than 60 days after conducting a source test, unless otherwise required by AQMD rules or equipment-specific conditions. The report shall contain the following information: [204]
- a. The results of the source test.

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION E: ADMINISTRATIVE CONDITIONS**

- b. Brief description of the equipment tested.
  - c. Operating conditions under which the test was performed.
  - d. Method of measuring operating parameters, such as fuel rate and process weight. Process schematic diagram showing the ports and sampling locations, including the dimensions of the ducts and stacks at the sampling locations, and distances of flow disturbances, (e.g. elbows, tees, fans, dampers) from the sampling locations (upstream and downstream).
  - e. Field and laboratory data forms, strip charts and analyses.
  - f. Calculations for volumetric flow rates, emission rates, control efficiency, and overall control efficiency.
10. The operator shall, when a source test is required, provide and maintain facilities for sampling and testing. These facilities shall comply with the requirements of AQMD Source Test Method 1.1 and 1.2. [217]
11. Whenever required to submit a written report, notification or other submittal to the Executive Officer, AQMD, or the District, the operator shall mail or deliver the material to: Deputy Executive Officer, Engineering and Compliance, AQMD, 21865 E. Copley Drive, Diamond Bar, CA 91765-4182. [204]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION F: RECLAIM MONITORING AND SOURCE TESTING REQUIREMENTS**

NOT APPLICABLE

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

See Section D of this permit for any Permit to Construct issued to this facility.

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION I: PLANS AND SCHEDULES**

This section lists all plans approved by AQMD for the purposes of meeting the requirements of applicable AQMD rules.

NONE

NOTE: This section does not list compliance schedules pursuant to the requirements of Regulation XXX - Title V Permits; Rule 3004(a)(10)(C). For equipment subject to a variance, order for abatement, or alternative operating condition granted pursuant to Rule 518.2, equipment specific conditions are added to the equipment in Section D or H of the permit.

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION J: AIR TOXICS**

---

NOT APPLICABLE

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION K: TITLE V Administration**

**GENERAL PROVISIONS**

1. This permit may be revised, revoked, reopened and reissued, or terminated for cause, or for failure to comply with regulatory requirements, permit terms, or conditions. [3004(a)(7)(C)]
2. This permit does not convey any property rights of any sort or any exclusive privilege. [3004(a)(7)(E)]

**Permit Renewal and Expiration**

3. (A) Except for solid waste incineration facilities subject to standards under section 129(e) of the Clean Air Act, this permit shall expire five years from the date that this Title V permit is issued. The operator's right to operate under this permit terminates at midnight on this date, unless the facility is protected by an application shield in accordance with Rule 3002(b), due to the filing of a timely and complete application for a Title V permit renewal, consistent with Rule 3003. [3004(a)(2), 3004(f)]  
  
(B) A Title V permit for a solid waste incineration facility combusting municipal waste subject to standards under Section 129(e) of the Clean Air Act shall expire 12 years from the date of issuance unless such permit has been renewed pursuant to this regulation. These permits shall be reviewed by the Executive Officer at least every five years from the date of issuance. [3004(f)(2)]
4. To renew this permit, the operator shall submit to the Executive Officer an application for renewal at least 180 days, but not more than 545 days, prior to the expiration date of this permit. [3003(a)(6)]

**Duty to Provide Information**

5. The applicant for, or holder of, a Title V permit shall furnish, pursuant to Rule 3002(d) and (e), timely information and records to the Executive Officer or designee within a reasonable time as specified in writing by the Executive Officer or designee. [3004(a)(7)(F)]

**Payment of Fees**

6. The operator shall pay all required fees specified in Regulation III - Fees. [3004(a)(7)(G)]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION K: TITLE V Administration**

**Reopening for Cause**

7. The Executive Officer will reopen and revise this permit if any of the following circumstances occur:
- (A) Additional regulatory requirements become applicable with a remaining permit term of three or more years. Reopening is not required if the effective date of the requirement is later than the expiration date of this permit, unless the permit or any of its terms and conditions has been extended pursuant to paragraph (f)(4) of Rule 3004.
  - (B) The Executive Officer or EPA Administrator determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
  - (C) The Executive Officer or EPA Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements. [3005(g)(1)]

**COMPLIANCE PROVISIONS**

8. The operator shall comply with all regulatory requirements, and all permit terms and conditions, except:
- (A) As provided for by the emergency provisions of condition no. 17 or condition no. 18, or
  - (B) As provided by an alternative operating condition granted pursuant to a federally approved (SIP-approved) Rule 518.2.

Any non-compliance with any federally enforceable permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or denial of a permit renewal application. Non-compliance may also be grounds for civil or criminal penalties under the California State Health and Safety Code. [3004(a)(7)(A)]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION K: TITLE V Administration**

9. The operator shall allow the Executive Officer or authorized representative, upon presentation of appropriate credentials to:
- (A) Enter the operator's premises where emission-related activities are conducted, or records are kept under the conditions of this permit;
  - (B) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
  - (C) Inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - (D) Sample or monitor at reasonable times, substances or parameters for the purpose of assuring compliance with the facility permit or regulatory requirements. [3004(a)(10)(B)]
10. All terms and conditions in this permit, including any provisions designed to limit a facility's potential to emit, are enforceable by the EPA Administrator and citizens under the federal Clean Air Act, unless the term or condition is designated as not federally enforceable. Each day during any portion of which a violation occurs is a separate offense. [3004(g)]
11. A challenge to any permit condition or requirement raised by EPA, the operator, or any other person, shall not invalidate or otherwise affect the remaining portions of this permit. [3007(b)]
12. The filing of any application for a permit revision, revocation, or termination, or a notification of planned changes or anticipated non-compliance does not stay any permit condition. [3004(a)(7)(D)]
13. It shall not be a defense for a person in an enforcement action, including those listed in Rule 3002(c)(2), that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit, except as provided for in "Emergency Provisions" of this section. [3004(a)(7)(H)]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION K: TITLE V Administration**

14. The operator shall not build, erect, install, or use any equipment, the use of which, without resulting in a reduction in the total release of air contaminants to atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Chapter 3 (commencing with Section 41700) of Part 4, of Division 26 of the California Health and Safety Code or of AQMD rules. This rule shall not apply to cases in which the only violation involved is of Section 41700 of the California Health and Safety Code, or Rule 402 of AQMD Rules. [408]
15. Nothing in this permit or in any permit shield can alter or affect:
- (A) Under Section 303 of the federal Clean Air Act, the provisions for emergency orders;
  - (B) The liability of the operator for any violation of applicable requirements prior to or at the time of permit issuance;
  - (C) The applicable requirements of the Acid Rain Program, Regulation XXXI;
  - (D) The ability of EPA to obtain information from the operator pursuant to Section 114 of the federal Clean Air Act;
  - (E) The applicability of state or local requirements that are not "applicable requirements", as defined in Rule 3000, at the time of permit issuance but which do apply to the facility, such as toxics requirements unique to the State; and
  - (F) The applicability of regulatory requirements with compliance dates after the permit issuance date. [3004(c)(3)]
16. For any portable equipment that requires an AQMD or state permit or registration, excluding a) portable engines, b) military tactical support equipment and c) AQMD-permitted portable equipment that are not a major source, are not located at the facility for more than 12 consecutive months after commencing operation, and whose operation does not conflict with the terms or conditions of this Title V permit: 1) the facility operator shall keep a copy of the AQMD or state permit or registration; 2) the equipment operator shall comply with the conditions on the permit or registration and all other regulatory requirements; and 3) the facility operator shall treat the permit or registration as a part of its Title V permit, subject to recordkeeping, reporting and certification requirements. [3004(a)(1)]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION K: TITLE V Administration  
EMERGENCY PROVISIONS**

17. An emergency<sup>1</sup> constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limit only if:
- (A) Properly signed, contemporaneous operating records or other credible evidence demonstrate that:
- (1) An emergency occurred and the operator can identify the cause(s) of the emergency;
  - (2) The facility was operated properly (i.e. operated and maintained in accordance with the manufacturer's specifications, and in compliance with all regulatory requirements or a compliance plan), before the emergency occurred;
  - (3) The operator took all reasonable steps to minimize levels of emissions that exceeded emissions standard, or other requirements in the permit; and,
  - (4) The operator submitted a written notice of the emergency to the AQMD within two working days of the time when the emissions limitations were exceeded due to the emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
- (B) The operator complies with the breakdown provisions of Rule 430 – Breakdown Provisions, or subdivision (i) of Rule 2004 – Requirements, whichever is applicable. [3002(g), 430, 2004(i)]
18. The operator is excused from complying with any regulatory requirement that is suspended by the Executive Officer during a state of emergency or state of war emergency, in accordance with Rule 118 - Emergencies. [118]

---

<sup>1</sup> "Emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the operator, including acts of God, which: (A) requires immediate corrective action to restore normal operation; and (B) causes the facility to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency; and (C) is not caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION K: TITLE V Administration  
RECORDKEEPING PROVISIONS**

19. In addition to any other recordkeeping requirements specified elsewhere in this permit, the operator shall keep records of required monitoring information, where applicable, that include:
- (A) The date, place as defined in the Title V permit, and time of sampling or measurements;
  - (B) The date(s) analyses were performed;
  - (C) The company or entity that performed the analyses;
  - (D) The analytical techniques or methods used;
  - (E) The results of such analyses; and
  - (F) The operating conditions as existing at the time of sampling or measurement. [3004(a)(4)(B)]
20. The operator shall maintain records pursuant to Rule 109 and any applicable material safety data sheet (MSDS) for any equipment claimed to be exempt from a written permit by Rule 219 based on the information in those records. [219(t)]
21. The operator shall keep all records of monitoring data required by this permit or by regulatory requirements for a period of at least five years from the date of the monitoring sample, measurement, report, or application. [3004(a)(4)(E)]

**REPORTING PROVISIONS**

22. The operator shall comply with the following requirements for prompt reporting of deviations:
- (A) Breakdowns shall be reported as required by Rule 430 – Breakdown Provisions or subdivision (i) of Rule 2004 - Requirements, whichever is applicable.

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION K: TITLE V Administration**

- (B) Other deviations from permit or applicable rule emission limitations, equipment operating conditions, or work practice standards, determined by observation or by any monitoring or testing required by the permit or applicable rules that result in emissions greater than those allowed by the permit or applicable rules shall be reported within 72 hours (unless a shorter reporting period is specified in an applicable State or Federal Regulation) of discovery of the deviation by contacting AQMD enforcement personnel assigned to this facility or otherwise calling (800) CUT-SMOG.
- (C) A written report of such deviations reported pursuant to (B), and any corrective actions or preventative measures taken, shall be submitted to AQMD, in an AQMD approved format, within 14 days of discovery of the deviation.
- (D) All other deviations shall be reported with the monitoring report required by condition no. 23. [3004(a)(5)]
23. Unless more frequent reporting of monitoring results are specified in other permit conditions or in regulatory requirements, the operator shall submit reports of any required monitoring to the AQMD at least twice per year. The report shall include a) a statement whether all monitoring required by the permit was conducted; and b) identification of all instances of deviations from permit or regulatory requirements. A report for the first six calendar months of the year is due by August 31 and a report for the last six calendar months of the year is due by February 28. [3004(a)(4)(F)]
24. The operator shall submit to the Executive Officer and to the Environmental Protection Agency (EPA), an annual compliance certification. For RECLAIM facilities, the certification is due when the Annual Permit Emissions Program (APEP) report is due and shall cover the same reporting period. For other facilities, the certification is due on March 1 for the previous calendar year. The certification need not include the period preceding the date the initial Title V permit was issued. Each compliance certification shall include:
- (A) Identification of each permit term or condition that is the basis of the certification;

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION K: TITLE V Administration**

- (B) The compliance status during the reporting period;
- (C) Whether compliance was continuous or intermittent;
- (D) The method(s) used to determine compliance over the reporting period and currently, and
- (E) Any other facts specifically required by the Executive Officer to determine compliance.

The EPA copy of the certification shall be sent to: Director of the Air Division Attn:  
Air-3 USEPA, Region IX 75 Hawthorne St. San Francisco, CA 94105 [3004(a)(10)(E)]

25. All records, reports, and documents required to be submitted by a Title V operator to AQMD or EPA shall contain a certification of accuracy consistent with Rule 3003(c)(7) by a responsible official (as defined in Rule 3000). [3004(a)(12)]

**PERIODIC MONITORING**

26. All periodic monitoring required by this permit pursuant to Rule 3004(a)(4)(c) is based on the requirements and justifications in the AQMD document "Periodic Monitoring Guidelines for Title V Facilities" or in case-by-case determinations documented in the Title V application file. [3004(a)(4)]

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION K: TITLE V Administration**

*FACILITY RULES*

*This facility is subject to the following rules and regulations*

With the exception of Rule 402, 473, 477, 1118 and Rules 1401 through 1420, the following rules that are designated as non-federally enforceable are pending EPA approval as part of the state implementation plan. Upon the effective date of that approval, the approved rule(s) will become federally enforceable, and any earlier versions of those rules will no longer be federally enforceable.

<b>RULE SOURCE</b>	<b>Adopted/Amended Date</b>	<b>FEDERAL Enforceability</b>
RULE 1113	11-8-1996	Federally enforceable
RULE 1113	7-13-2007	Non federally enforceable
RULE 1146.1	5-13-1994	Federally enforceable
RULE 1146.1	9-5-2008	Non federally enforceable
RULE 1147	12-5-2008	Non federally enforceable
RULE 1171	11-7-2003	Federally enforceable
RULE 1171	5-1-2009	Non federally enforceable
RULE 1175	11-5-2010	Non federally enforceable
RULE 1175	5-13-1994	Federally enforceable
RULE 118	12-7-1995	Non federally enforceable
RULE 204	10-8-1993	Federally enforceable
RULE 217	1-5-1990	Federally enforceable
RULE 219	9-4-1981	Federally enforceable
RULE 3002	11-14-1997	Federally enforceable
RULE 3003	11-14-1997	Federally enforceable
RULE 3005	11-14-1997	Federally enforceable
RULE 3007	10-8-1993	Federally enforceable
RULE 304	1-14-1982	Non federally enforceable
RULE 401	11-9-2001	Non federally enforceable
RULE 401	3-2-1984	Federally enforceable
RULE 402	5-7-1976	Non federally enforceable
RULE 404	2-7-1986	Federally enforceable

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**SECTION K: TITLE V Administration**

<b>RULE SOURCE</b>	<b>Adopted/Amended Date</b>	<b>FEDERAL Enforceability</b>
RULE 405	2-7-1986	Federally enforceable
RULE 408	5-7-1976	Federally enforceable
RULE 430	7-12-1996	Non federally enforceable
RULE 701	6-13-1997	Federally enforceable



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
21865 Copley Drive, Diamond Bar, CA 91765

Appendix A Page: 1  
Facility ID: 043605  
Revision #: 0  
Date: August 01, 2002

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

APPENDIX A: NOX AND SOX EMITTING EQUIPMENT EXEMPT FROM WRITTEN  
PERMIT PURSUANT TO RULE 219

NONE

**FACILITY PERMIT TO OPERATE  
 FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
 [RULE 1113 11-08-1996]**

- (1) Except as provided in paragraphs (c)(2), (c)(3), and (c)(4) of Rule 1113, the operator shall not supply, sell, offer for sale, apply, or solicit the application of, any architectural coating which, at the time of sale or manufacture, contains more than 250 grams of VOC per liter of coating (2.08 pounds per gallon), less water, less exempt compounds, and less any colorant added to tint bases, or manufacture, blend, or repackage such a coating for use within the District.
- (2) Except as provided in paragraphs (c)(3) and (c)(4) of Rule 1113, the operator shall not supply, sell, offer for sale, apply, solicit the application of, manufacture, blend, or repackage, for use within the District, any architectural coating listed in the Table of Standards which contains VOC (excluding any colorant added to tint bases) in excess of the corresponding VOC limit specified in the table, after the effective date specified.

**TABLE OF STANDARDS**

**VOC LIMITS**

**Grams of VOC Per Liter of Coating,  
 Less Water And Less Exempt Compounds**

COATING	Limit*	Effective Date of Adoption	Effective 1/1/1998	Effective 1/1/1999	Effective 7/1/2001	Effective 1/1/2005	Effective 7/1/2008
Bond Breakers	350						
Clear Wood Finishes							
Varnish	350						
Sanding Sealers	350						
Lacquer	680		550			275	
Concrete-Curing Compounds	350						
Dry-Fog Coatings	400						
Fire-proofing Exterior Coatings	350	450		350			
Fire-Retardant Coatings							
Clear	650						
Pigmented	350						
Flats	250						
Graphic Arts (Sign) Coatings	500				100		50

**FACILITY PERMIT TO OPERATE  
 FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
 [RULE 1113 11-08-1996]**

Industrial Maintenance Primers and Topcoats						
Alkyds	420					
Catalyzed Epoxy	420					
Bituminous Coatings	420					
Materials						
Inorganic Polymers	420					
Vinyl Chloride Polymers	420					
Chlorinated Rubber	420					
Acrylic Polymers	420					
Urethane Polymers	420					
Silicones	420					
Unique Vehicles	420					
Japans/Faux Finishing Coatings	350	700		350		
Magnesite Cement Coatings	600			450		
Mastic Coatings	300					
Metallic Pigmented Coatings	500					
Multi-Color Coatings	420		250			
Pigmented Lacquer	680		550		275	
Pre-Treatment Wash Primers	780					
Primers, Sealers, and Undercoaters	350					
Quick-Dry Enamels	400					
Roof Coatings	300					
Shellac						
Clear	730					
Pigmented	550					
Stains	350					
Swimming Pool Coatings						
Repair	650					
Other	340					
Traffic Coatings	250		150			
Waterproofing Sealers	400					
Wood Preservatives						
Below-Ground	350					
Other	350					

\* The specified limits remain in effect unless revised limits are listed in subsequent columns in the Table of Standards

**TABLE OF STANDARDS (cont.)**

**VOC LIMITS**

**Grams of VOC Per Liter of Material**

COATING	Limit
Low-Solids Coating	120

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**APPENDIX B: RULE EMISSION LIMITS  
[RULE 1113 07-13-2007]**

- (1) Except as provided in paragraphs (c)(2), (c)(3), (c)(4), and specified coatings averaged under (c)(6), no person shall supply, sell, offer for sale, manufacture, blend, or repackage any architectural coating for use in the District which, at the time of sale or manufacture, contains more than 250 grams of VOC per liter of coating (2.08 pounds per gallon), less water, less exempt compounds, and less any colorant added to tint bases, and no person shall apply or solicit the application of any architectural coating within the District that exceeds 250 grams of VOC per liter of coating as calculated in this paragraph.
  
- (2) Except as provided in paragraphs (c)(3), (c)(4), and designated coatings averaged under (c)(6), no person shall supply, sell, offer for sale, manufacture, blend, or repackage, for use within the District, any architectural coating listed in the Table of Standards which contains VOC (excluding any colorant added to tint bases) in excess of the corresponding VOC limit specified in the table, after the effective date specified, and no person shall apply or solicit the application of any architectural coating within the District that exceeds the VOC limit as specified in this paragraph. No person shall apply or solicit the application within the District of any industrial maintenance coatings, except anti-graffiti coatings, for residential use or for use in areas such as office space and meeting rooms of industrial, commercial or institutional facilities not exposed to such extreme environmental conditions described in the definition of industrial maintenance coatings; or of any rust-preventative coating for industrial use, unless such a rust preventative coating complies with the Industrial Maintenance Coating VOC limit specified in the Table of Standards.

**FACILITY PERMIT TO OPERATE  
 FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
 [RULE 1113 07-13-2007]  
 TABLE OF STANDARDS  
 VOC LIMITS**

**Grams of VOC Per Liter of Coating,  
 Less Water and Less Exempt Compounds**

COATING CATEGORY	Ceiling Limit*	Current Limit	Effective Date					
			1/1/03	1/1/04	1/1/05	7/1/06	7/1/07	7/1/08
Bond Breakers	350							
Clear Wood Finishes	350					275		
Varnish	350					275		
Sanding Sealers	350					275		
Lacquer	680	550			275			
Clear Brushing Lacquer	680				275			
Concrete-Curing Compounds	350						100	
Concrete-Curing Compounds For Roadways and Bridges**	350							
Dry-Fog Coatings	400						150	
Fire-Proofing Exterior Coatings	450	350						
Fire-Retardant Coatings***								
Clear	650							
Pigmented	350							
Flats	250	100						50
Floor Coatings	420		100			50		
Graphic Arts (Sign) Coatings	500							
Industrial Maintenance (IM) Coatings	420			250		100		
High Temperature IM Coatings			420					
Zinc-Rich IM Primers	420		340			100		
Japans/Faux Finishing Coatings	700	350						
Magnesite Cement Coatings	600	450						
Mastic Coatings	300							
Metallic Pigmented Coatings	500							
Multi-Color Coatings	420	250						
Nonflat Coatings	250		150			50		

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
[RULE 1113 07-13-2007]**

COATING CATEGORY	Ceiling Limit	Current Limit	Effective Date					
			1/1/03	1/1/04	1/1/05	7/1/06	7/1/07	7/1/08
Nonflat High Gloss	250		150				50	
Pigmented Lacquer	680	550			275			
Pre-Treatment Wash Primers	780		420					
Primers, Sealers, and Undercoaters	350		200			100		
Quick-Dry Enamels	400		250			150	50	
Quick-Dry Primers, Sealers, and Undercoaters	350		200			100		
Recycled Coatings			250					
Roof Coatings	300		250		50			
Roof Coatings, Aluminum	500				100			
Roof Primers, Bituminous	350		350					
Rust Preventative Coatings	420		400			100		
Shellac								
Clear	730							
Pigmented	550							
Specialty Primers	350					250	100	
Stains	350		250				100	
Stains, Interior	250							
Swimming Pool Coatings								
Repair	650		340					
Other	340							
Traffic Coatings	250	150					100	
Waterproofing Sealers	400		250			100		
Waterproofing Concrete/Masonry Sealers	400					100		
Wood Preservatives								
Below-Ground	350							
Other	350							

- \* The specified limits remain in effect unless revised limits are listed in subsequent columns in the Table of Standards.
- \*\* Does not include compounds used for curbs and gutters, sidewalks, islands, driveways and other miscellaneous concrete areas.
- \*\*\* The Fire-Retardant Coating category will be eliminated on January 1, 2007 and subsumed by the coating category for which they are formulated.

---

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

---

**APPENDIX B: RULE EMISSION LIMITS  
[RULE 1113 07-13-2007]**

**TABLE OF STANDARDS (cont.)  
VOC LIMITS**

**Grams of VOC Per Liter of Material**

<b>COATING</b>	<b>Limit</b>
<b>Low-Solids Coating</b>	<b>120</b>

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
[RULE 1171 11-07-2003]**

(1) Solvent Requirements

A person shall not use a solvent to perform solvent cleaning operations unless the solvent complies with the applicable requirements set forth below:

SOLVENT CLEANING ACTIVITY	CURRENT LIMITS
	VOC g/l (lb/gal)
(A) Product Cleaning During Manufacturing Process Or Surface Preparation For Coating, Adhesive, Or Ink Application	
(i) General	25 (0.21)
(ii) Electrical Apparatus Components & Electronic Components	500 (4.2)
(iii) Medical Devices & Pharmaceuticals	800 (6.7)
(B) Repair and Maintenance Cleaning	
(i) General	25 (0.21)
(ii) Electrical Apparatus Components & Electronic Components	900 (7.5)

**FACILITY PERMIT TO OPERATE  
 FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
 [RULE 1171 11-07-2003]**

SOLVENT CLEANING ACTIVITY	CURRENT LIMITS
	VOC g/l (lb/gal)
(iii) Medical Devices & Pharmaceuticals	
(A) Tools, Equipment, & Machinery	800 (6.7)
(B) General Work Surfaces	600 (5.0)
(C) Cleaning of Coatings or Adhesives Application Equipment	550 (4.6)
(D) Cleaning of Ink Application Equipment	
(i) General	25 (0.21)
(ii) Flexographic Printing	25 (0.21)
(iii) Gravure Printing	
(A) Publication	750 (6.3)
(B) Packaging	25 (0.21)
(iv) Lithographic or Letter Press Printing	

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
[RULE 1171 11-07-2003]**

SOLVENT CLEANING ACTIVITY	CURRENT LIMITS
	VOC g/l (lb/gal)
(A) Roller Wash – Step 1	600 (5.0)
(B) Roller Wash-Step 2, Blanket Wash, & On-Press Components	800 (6.7)
(C) Removable Press Components	25 (0.21)
(v) Screen Printing	750 (6.3)
(vi) Ultraviolet Ink/ Electron Beam Ink Application Equipment (except screen printing)	800 (6.7)
(vii) Specialty Flexographic Printing	600 (5.0)
(E) Cleaning of Polyester Resin Application Equipment	25 (0.21)

**FACILITY PERMIT TO OPERATE  
 FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
 [RULE 1171 05-01-2009]**

(1) Solvent Requirements

A person shall not use a solvent to perform solvent cleaning operations unless the solvent complies with the applicable requirements set forth below:

	<b>CURRENT LIMITS*</b>	<b>EFFECTIVE 1/1/2010</b>
<b>SOLVENT CLEANING ACTIVITY</b>	<b>VOC g/l (lb/gal)</b>	<b>VOC g/l (lb/gal)</b>
(A) Product Cleaning During Manufacturing Process Or Surface Preparation For Coating, Adhesive, Or Ink Application		
(i) General	25 (0.21)	
(ii) Electrical Apparatus Components & Electronic Components	100 (0.83)	
(iii) Medical Devices & Pharmaceuticals	800 (6.7)	
(B) Repair and Maintenance Cleaning		
(i) General	25 (0.21)	
(ii) Electrical Apparatus Components & Electronic Components	100 (0.83)	

**FACILITY PERMIT TO OPERATE  
 FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
 [RULE 1171 05-01-2009]**

	<b>CURRENT LIMITS*</b>	<b>EFFECTIVE 1/1/2010</b>
<b>SOLVENT CLEANING ACTIVITY (cont.)</b>	<b>VOC g/l (lb/gal)</b>	<b>VOC g/l (lb/gal)</b>
(iii) Medical Devices & Pharmaceuticals		
(A) Tools, Equipment, & Machinery	800 (6.7)	
(B) General Work Surfaces	600 (5.0)	
(C) Cleaning of Coatings or Adhesives Application Equipment	25 (0.21)	
(D) Cleaning of Ink Application Equipment		
(i) General	25 (0.21)	
(ii) Flexographic Printing	25 (0.21)	
(iii) Gravure Printing		
(A) Publication	100 (0.83)	
(B) Packaging	25 (0.21)	
(iv) Lithographic (Offset) or Letter Press Printing		
(A) Roller Wash, Blanket Wash, & On-Press Components	100 (0.83)	

**FACILITY PERMIT TO OPERATE  
 FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
 [RULE 1171 05-01-2009]**

	<b>CURRENT LIMITS*</b>	<b>EFFECTIVE 1/1/2010</b>
<b>SOLVENT CLEANING ACTIVITY (cont.)</b>	<b>VOC g/l (lb/gal)</b>	<b>VOC g/l (lb/gal)</b>
(B) Removable Press Components	25 (0.21)	
(v) Screen Printing	100 (0.83)	
(vi) Ultraviolet Ink/ Electron Beam Ink Application Equipment (except screen printing)	650 (5.4)	100 (0.83)
(vii) Specialty Flexographic Printing	100 (0.83)	
(E) Cleaning of Polyester Resin Application Equipment	25 (0.21)	

\* The specified limits remain in effect unless revised limits are listed in subsequent columns.

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
[RULE 404 02-07-1986]**

The operator shall not discharge into the atmosphere from this equipment, particulate matter in excess of the concentration at standard conditions, shown in Table 404(a). Where the volume discharged is between figures listed in the Table, the exact concentration permitted to be discharged shall be determined by linear interpolation.

For the purposes of this rule, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

**TABLE 404(a)**

Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions		Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions	
Cubic meters Per Minute	Cubic feet Per Minute	Milligrams per Cubic Meter	Grains per Cubic Foot	Cubic meters Per Minute	Cubic feet Per Minute	Milligrams per Cubic Meter	Grains per Cubic Foot
25 or less	883 or less	450	0.196	900	31780	118	0.0515
30	1059	420	.183	1000	35310	113	.0493
35	1236	397	.173	1100	38850	109	.0476
40	1413	377	.165	1200	42380	106	.0463
45	1589	361	.158	1300	45910	102	.0445

**FACILITY PERMIT TO OPERATE  
 FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
 [RULE 404 02-07-1986]**

Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions		Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions	
Cubic meters Per Minute	Cubic feet Per Minute	Milligrams per Cubic Meter	Grains per Cubic Foot	Cubic meters Per Minute	Cubic feet Per Minute	Milligrams per Cubic Meter	Grains per Cubic Foot
50	1766	347	.152	1400	49440	100	.0437
60	2119	324	.141	1500	52970	97	.0424
70	2472	306	.134	1750	61800	92	.0402
80	2825	291	.127	2000	70630	87	.0380
90	3178	279	.122	2250	79460	83	.0362
100	3531	267	.117	2500	88290	80	.0349
125	4414	246	.107	3000	105900	75	.0327
150	5297	230	.100	4000	141300	67	.0293
175	6180	217	.0947	5000	176600	62	.0271
200	7063	206	.0900	6000	211900	58	.0253
250	8829	190	.0830	8000	282500	52	.0227
300	10590	177	.0773	10000	353100	48	.0210
350	12360	167	.0730	15000	529700	41	.0179
400	14130	159	.0694	20000	706300	37	.0162
450	15890	152	.0664	25000	882900	34	.0148

**FACILITY PERMIT TO OPERATE  
 FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
 [RULE 404 02-07-1986]**

Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions		Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions	
Cubic meters Per Minute	Cubic feet Per Minute	Milligrams per Cubic Meter	Grains per Cubic Foot	Cubic meters Per Minute	Cubic feet Per Minute	Milligrams per Cubic Meter	Grains per Cubic Foot
500	17660	146	.0637	30000	1059000	32	.0140
600	21190	137	.0598	40000	1413000	28	.0122
700	24720	129	.0563	50000	1766000	26	.0114
800	28250	123	.0537	70000 or more	2472000 or more	23	.0100

**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
[RULE 405 02-07-1986]**

The operator shall not discharge into the atmosphere from this equipment, solid particulate matter including lead and lead compounds in excess of the rate shown in Table 405(a).

Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.

For the purposes of this rule, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

**TABLE 405(a)**

Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All Points of Process)		Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All points of Process)	
Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour
100 or less	220 or less	0.450	0.99	9000	19840	5.308	11.7
150	331	0.585	1.29	10000	22050	5.440	12.0
200	441	0.703	1.55	12500	27560	5.732	12.6
250	551	0.804	1.77	15000	33070	5.982	13.2
300	661	0.897	1.98	17500	38580	6.202	13.7
350	772	0.983	2.17	20000	44090	6.399	14.1
400	882	1.063	2.34	25000	55120	6.743	14.9
450	992	1.138	2.51	30000	66140	7.037	15.5
500	1102	1.209	2.67	35000	77160	7.296	16.1
600	1323	1.340	2.95	40000	88180	7.527	16.6



**FACILITY PERMIT TO OPERATE  
FREE FLOW PACKAGING INTERNATIONAL, INC.**

**APPENDIX B: RULE EMISSION LIMITS  
[RULE 405 02-07-1986]**

Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All Points of Process)		Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All points of Process)	
Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour	Kilograms Per Hour	Pounds Per Hour
700	1543	1.461	3.22	45000	99210	7.738	17.1
800	1764	1.573	3.47	50000	110200	7.931	17.5
900	1984	1.678	3.70	60000	132300	8.277	18.2
1000	2205	1.777	3.92	70000	154300	8.582	18.9
1250	2756	2.003	4.42	80000	176400	8.854	19.5
1500	3307	2.206	4.86	90000	198400	9.102	20.1
1750	3858	2.392	5.27	100000	220500	9.329	20.6
2000	4409	2.563	5.65	125000	275600	9.830	21.7
2250	4960	2.723	6.00	150000	330700	10.26	22.6
2500	5512	2.874	6.34	175000	385800	10.64	23.5
2750	6063	3.016	6.65	200000	440900	10.97	24.2
3000	6614	3.151	6.95	225000	496000	11.28	24.9
3250	7165	3.280	7.23	250000	551200	11.56	25.5
3600	7716	3.404	7.50	275000	606300	11.82	26.1
4000	8818	3.637	8.02	300000	661400	12.07	26.6
4500	9921	3.855	8.50	325000	716500	12.30	27.1
5000	11020	4.059	8.95	350000	771600	12.51	27.6
6000	13230	4.434	9.78	400000	881800	12.91	28.5
7000	15430	4.775	10.5	450000	992100	13.27	29.3
8000	17640	5.089	11.2	500000 or more	1102000 or more	13.60	30.0