



MAY 12 2010

Mr. Ron Crookham
Dart Container Corporation
1400 E Victor Road
Lodi, CA 95240

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # N-1093342**

Dear Mr. Crookham:

The Air Pollution Control Officer has issued an Authority to Construct (N-257-2-4) with a Certificate of Conformity to Dart Container Corporation. The project is to modify the existing expandable polystyrene processing operation to comply with the applicable requirements of District Rule 4682 - Polystyrene, Polyethylene, and Polypropylene Products Manufacturing (9/20/2007).

Enclosed is the Authority to Construct and invoice. The application and proposal were sent to US EPA Region IX on March 30, 2010. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW: JK/cm

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
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34946 Flyover Court
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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

MAY 12 2010

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # N-1093342**

Dear Mr. Rios:

The Air Pollution Control Officer has issued an Authority to Construct (N-257-2-4) with a Certificate of Conformity to Dart Container Corporation. The project is to modify the existing expandable polystyrene processing operation to comply with the applicable requirements of District Rule 4682 - Polystyrene, Polyethylene, and Polypropylene Products Manufacturing (9/20/2007).

Enclosed is a copy of the Authority to Construct. The application and proposal were sent to US EPA Region IX on March 30, 2010. No comments were received following the District's preliminary decision on this project.

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AUTHORITY TO CONSTRUCT

PERMIT NO: N-257-2-4

ISSUANCE DATE: 05/10/2010

LEGAL OWNER OR OPERATOR: DART CONTAINER CORPORATION

MAILING ADDRESS: 1400 EAST VICTOR ROAD
LODI, CA 95240

LOCATION: 1400 EAST VICTOR ROAD
LODI, CA 95240

EQUIPMENT DESCRIPTION:

MODIFICATION OF EXPANDABLE POLYSTYRENE PROCESSING OPERATION INCLUDING: INSTALLATION OF TWO PRE-EXPANDERS, INSTALLATION OF RAW BEAD HANDLING SYSTEM, MODIFICATION TO THE EXISTING BEAD HANDLING SYSTEM, CONSOLIDATION OF PERMITS N-257-1 (BEAD HANDLING SYSTEM) AND N-257-3-1 (EXPANSION MOLDING SYSTEM) SUCH THAT THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BECOME: EXPANDABLE POLYSTYRENE (EPS) PROCESSING OPERATION: ENCLOSED BEAD DUMPING OPERATION CONSISTING OF A HOPPER AND DUMPER SYSTEM, ONE HOLDING TANK AND ONE BLENDER, FOUR RODMAN PRE-EXPANDERS WITH CASCADE DRYERS ALL VENTED TO THE VAPOR RECOVERY SYSTEM; ENCLOSED BEAD DUMPING OPERATION CONSISTING OF A HOPPER AND DUMPER SYSTEM, ONE HOLDING TANK, TWO FEEDERS, TWO FEED/WEIGH BINS, TWO HIRSCH PRE-EXPANDERS WITH VENTS AND DELUMPERS, AND TWO BLADDER TANKS ALL VENTED TO THE VAPOR RECOVERY SYSTEM; AND EIGHTY-SEVEN MOLDING MACHINES. THE VAPOR RECOVERY SYSTEM WITH AN IN-LINE CYCLONE SEPARATOR IS VENTED TO THE BOILERS PERMITTED UNDER N-257-4 AND N-257-5.

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-257-2-4 : May 10 2010 11:41 AM - KAHLOLU : Joint Inspection NOT Required

3. A permanent total enclosure (PTE) shall be installed around the existing raw bead dumping operation serving Rodman pre-expanders. This enclosure shall follow PTE criteria in EPA Method 204, and shall be vented to the vapor recovery system at or above the average facial velocity (fpm) established during the initial source testing. [District Rule 4682] Federally Enforceable Through Title V Permit
4. The cascade dryers serving Rodman pre-expanders shall be modified to meet PTE criteria in EPA Method 204. These dryers shall be vented to the vapor recovery system at or above the average facial velocity (fpm) established during the initial source testing. [District Rule 4682] Federally Enforceable Through Title V Permit
5. The permittee shall install, operate, and maintain two Hirsch pre-expanders. [District Rule 4682] Federally Enforceable Through Title V Permit
6. Two bladder bags, one for each Hirsch pre-expander, shall be used to collect pentane from each pre-expander vent. The collected vapors shall be released into the vapor recovery system. [District Rule 4682]
7. Delumpers (i.e. bottom part to which pre-puff is discharged) of Hirsch pre-expanders shall meet PTE criteria in EPA Method 204. These delumpers shall be vented to the vapor recovery system at or above the average facial velocity (fpm) established during the initial source testing. [District Rule 4682] Federally Enforceable Through Title V Permit
8. The permittee shall install, operate, and maintain a new separate raw bead handling system for Hirsch pre-expanders. This bead handling system includes: a bead dumping operation transferring raw beads into a hopper, enclosed augers transferring beads from the hopper to a holding tank and from the holding tank to the feeders and weigh bins for Hirsch pre-expanders. The bead dumping operation shall be conducted inside a PTE that must meet PTE criteria in EPA Method 204. The bead transferring augers, product holding tanks, new feeders and weigh bins shall be enclosed and designed to meet PTE criteria in EPA Method 204. Each unit in the bead handling system shall be vented to the vapor recovery system at or above the average facial velocity (fpm) established during the initial source testing. [District Rule 4682] Federally Enforceable Through Title V Permit
9. The vapor recovery system shall be connected to the boilers (N-257-4 and N-257-5) at all times, except for periods of routine testing or emergency safety. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The vapor recovery system shall be operated in a manner which maximizes collection efficiency at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The polystyrene pellets shall be received and stored in cartons and/or bags lined with vapor transmission inhibiting film. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The operator shall visibly inspect the polystyrene pellet cartons upon receipt and weekly thereafter for damage to the vapor transmission inhibiting film. If damage is discovered, the permittee shall take corrective action immediately by either processing the carton or re-sealing the carton. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. All conveyors shall be enclosed to minimize fugitive VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The chamber temperature of each Rodman pre-expander shall not exceed 215°F. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The pre-puff beads shall be processed in a manner that minimizes fugitive VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
16. There shall be no visible emissions from the bead handling systems, pre-expansion systems, or the molding systems. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The pentane content in the raw EPS beads shall be at or below 5.4% by weight, when the raw bead boxes are received from a vendor. EPS bead manufacturer certification receipt must be kept as a record to demonstrate compliance with this condition. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Manufacturing emissions are defined as the emissions from bead handling, pre-puffing, and molding processes. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The Manufacturing VOC emissions shall not exceed 161.1 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. The amount of raw EPS beads processed through the Rodman and Hirsch pre-expanders shall not exceed 28,774 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The amount of raw EPS beads through any one Hirsch pre-expander shall not exceed 19,423 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Effective on and after September 20, 2010, the total product emissions shall not exceed 2.4 pounds of VOC per 100 pounds of the raw beads processed, calculated over a monthly period. Exceeding this limit shall constitute violation for each day of that monthly period. The total product emissions is same as defined in Section 5.3.1 of Rule 4682 (9/20/2007). [District Rule 4682] Federally Enforceable Through Title V Permit
23. The boilers (N-257-4 and N-257-5) shall be operated to reduce at least 95% of the pentane entering these units. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The overall pentane emissions from the bead handling systems shall be reduced by a minimum of 50% by weight, based on a monthly average basis. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Unless otherwise noted, for the purposes of this permit, P1 is the percent weight of pentane in raw EPS beads (taken directly from newly opened box), P2 is the percent weight of pentane in pre-puff beads, P3 is the percent weight of pentane in the molded product, CE is the VOC control efficiency of the boilers operating under N-257-4 and N-257-5. For daily calculation purposes, P1 value may be taken from EPS bead manufacturer certification receipt, which must be kept as a record. [District Rules 1081, 2201, 2520, 9.3.2, 4682] Federally Enforceable Through Title V Permit
26. P1, P2 and P3 shall be established for the EPS processed through the Hirsch expanders within 120 days of startup under this permit using a third party source test contractor. For determining P1, P2, and P3, the samples shall be taken as follows: P1 - take 6 samples from manufacturer lot #1, take 6 samples from manufacturer lot #2, take 3 samples from manufacturer lot #3; P2 - take 15 samples for each density product; P3 - take 3 samples for each density product. An average of the test results would establish a value for respective parameter. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
27. The minimum stack temperature (°F) for each boiler shall be established during initial source test while demonstrating compliance with the VOC control efficiency and the VOC emission limits of this permit. The established reading shall be listed in the Permit to Operate. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
28. The minimum airflow rate (cfm) for the vapor recovery system shall be established during the initial source test while demonstrating compliance with PTE requirements in EPA Method 204 for the units vented to the vapor recovery system. The established reading shall be listed in the Permit to Operate. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
29. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
30. Source testing shall be conducted within 120 days of initial startup under this permit, or before September 20, 2010, whichever comes first. The initial startup date shall be recorded in a file. [District Rule 2201] Federally Enforceable Through Title V Permit
31. The initial source testing shall be conducted to determine all necessary parameters (e.g. average facial velocity, the direction of air flow, and other required design checks) to ensure compliance with the permit conditions that require an equipment to meet criteria for permanent total enclosure in EPA Method 204. [District Rules 1081, 2201 and 4682] Federally Enforceable Through Title V Permit
32. Initial and annual source testing shall be conducted to verify compliance with the total product emissions limit (2.4 lb-VOC/100 lb-EPS processed), the daily VOC emission limit (161.1 lb/day), the overall pentane emission reductions from the bead handling system (50% or more by weight), and the boilers (N-257-4 and N-257-5) control efficiency (95% or more by weight) . [District Rule 2201 and 4682] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

33. P1, P2, and P3 shall be determined annually for each EPS material. The samples shall be taken as follows: P1 - take 3 samples from a bead box; P2 - take 3 samples for each density product; P3 - take 3 samples for each density product. An average of the test results would establish a value for respective parameter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
34. P1, P2 and P3 for each EPS material shall be re-established, at least once every five years, or when pentane content in raw beads exceeds the pre-established limit. For determining P1, P2, and P3, the samples shall be taken as follows: P1 - take 6 samples from manufacturer lot #1, take 6 samples from manufacturer lot #2, take 3 samples from manufacturer lot #3; P2 - take 15 samples for each density product; P3 - take 3 samples for each density product. An average of the test results would establish a value for respective parameter. [District Rule 4682] Federally Enforceable Through Title V Permit
35. P1, P2 and P3 shall be determined using SCAQMD Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternate method as approved by the District, EPA and CARB. [District Rule 4682] Federally Enforceable Through Title V Permit
36. The total product emissions shall be determined by taking the sum of lb-VOC/100 lb raw beads processed each day for a month and then divide it by the number of days in that month. [District Rule 4682] Federally Enforceable Through Title V Permit
37. For processing multiple types of EPS materials in a given day, the daily Manufacturing VOC emissions shall be determined by taking the sum of the numbers obtained for each type of processing material using the following equation: $[(P1 - P3) - (P1 - P2)(CE)](\text{Processing Rate (lb-EPS/day)})$. [District Rule 2201] Federally Enforceable Through Title V Permit
38. For processing a single type of EPS material in a given day, the daily Manufacturing VOC emissions shall be determined using the following equation: $[(P1 - P3)(\text{Processing Rate (lb/day)}) - (\text{CEMS data, lb-VOC/day})(CE)]$. [District Rule 2201] Federally Enforceable Through Title V Permit
39. Source testing to verify the overall pentane reductions and the minimum control efficiency of the boilers (N-257-4 and N-257-5) shall be conducted within 120 days of initial startup under this permit and annually thereafter. The influent concentration from the vapor recovery system to the boilers and effluent concentration from the boiler stacks shall be measured using EPA Test Method 25 or 25A. These concentrations shall be converted to mass emission rates (lb-VOC/hr, lb-VOC/day) for determining overall pentane reductions, and the control efficiency of the boilers. [District Rule 1081 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
40. The overall pentane emissions reductions from the bead handling systems (%) shall be computed using the following equation: $(100)\{(Mi - Mo)/Mi\} \{Mi/(E1+E2)\}$, where Mi = mass emission rate at the inlet of boilers (lb-VOC/day), Mo = mass emission rate at boilers stack (lb-VOC/day), $E1$ = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Rodman pre-expanders, $E2$ = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Hirsch pre-expanders. [District Rule 1081 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
41. The operator shall verify the accuracy of the CEMS during each source test. This system shall be calibrated and operated in accordance with the requirements of 40 CFR Part 51. [District Rules 1081, 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
42. The permittee shall utilize continuous emissions monitor system (CEMS) to measure and record VOC concentration and volumetric airflow (cfm) of the laden air stream from the vapor recovery system. [District Rule 2201] Federally Enforceable Through Title V Permit
43. The permittee shall use a handheld anemometer to measure average facial velocity (fpm) of natural draft openings for each permanent total enclosure on a monthly basis. These measurements shall be compared with the numbers established in the initial source test to detect a problem. [District Rule 2201] Federally Enforceable Through Title V Permit
44. Temperature of the Rodman pre-expanders shall be observed and recorded daily while any unit operates. The records shall include date of inspection and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

45. Visible emission inspection shall be performed daily. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
46. The permittee shall maintain records of the following items for the product processed through Rodman pre-expanders: (1) date, (2) amount of EPS processed (lb/day), (3) established P1, P2, and P3, and (4) P1, P2, and P3 during the latest source test. [District Rules 1070, 2520 - 9.4.2, 4682] Federally Enforceable Through Title V Permit
47. The permittee shall maintain records of the following items for the product processed through Hirsch pre-expanders: (1) date, (2) amount of EPS processed (lb/day), (3) established P1, P2, and P3, and (4) P1, P2, and P3 during the latest source test. [District Rules 1070, 2520 - 9.4.2, 4682] Federally Enforceable Through Title V Permit
48. The permittee shall maintain records of the daily Manufacturing VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
49. The permittee shall maintain records of the total product emissions (lb-VOC/100 lb of raw beads processed), calculated over a monthly period. [District Rules 4682] Federally Enforceable Through Title V Permit
50. For each source test, the permittee shall maintain records of the date, type of the EPS material, name of the person and company collecting product samples to test P1, P2, P3, and a copy of test results. [District Rule 1070] Federally Enforceable Through Title V Permit
51. The permittee shall keep records of: (1) date, (2) system identification (e.g. bead dumping operation), (3) average facial velocity (fpm) across natural draft openings during the initial source testing, and (4) average facial velocity measurement (fpm) with handheld anemometer. [District Rule 4682] Federally Enforceable Through Title V Permit
52. The operator shall keep all records for a minimum of five years. These records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA. The records shall be submitted to the APCO, ARB, or EPA upon request. [District Rules 1070, 2201, 2520 - 9.4.2, 4682] Federally Enforceable Through Title V Permit
53. The operator shall submit a written report to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
54. The laden air stream from the vapor recovery system shall be measured and recorded at least every 15-minute using airflow rate detection sensors. The recorded data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the established minimum airflow during the initial source test. The averaged readings shall be recorded each day the pre-puff process operates. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rules 2201 and 4682, 40 CFR Part 64] Federally Enforceable Through Title V Permit
55. Each boiler's stack temperature shall be measured and recorded at least every 15-minute using a thermocouple. The recorded temperature data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the established temperature range. The averaged readings shall be recorded each day the boilers operate. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rules 2201 and 4682, 40 CFR Part 64] Federally Enforceable Through Title V Permit
56. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7 for the boilers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
57. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9 for the boilers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
58. If the District or EPA determines per 40 CFR 64.7(d)(2) that a Quality Improvement Plan is required, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

59. Permits to Operate N-257-1 and N-257-3 shall be cancelled upon implementation of this permit. [District Rule 2201]
Federally Enforceable Through Title V Permit