
YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT
1947 Galileo Court, Suite 103, Davis, CA 95616
(530) 757-3650

TITLE V OPERATING PERMIT
Permit Number: F-00502-7

ISSUED TO:
Insulfoam, LLC
1019 Pacific Avenue, Suite 1501
Tacoma, WA 98402

PLANT SITE LOCATION:
1155 Business Park Drive
Dixon, CA 95620

ISSUED BY:

Mat Ehrhardt, P.E. Air Pollution Control Officer

Date

PROPOSED November 16, 2010

EFFECTIVE Proposed

EXPIRATION Proposed

Nature of Business:
SIC Code:

Expanded Polystyrene Processing
3086

Responsible Official:
Name: James R. Johnson
Title: Vice President
Phone: 800-248-5995

Site Contact Person:
Name: Shawn Osler
Title: Environmental Compliance Manager
Phone: 253-779-9200

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I. FACILITY EMISSION UNITS AND EQUIPMENT LISTS:

Insignificant Emissions Units

Insignificant emissions units or exempted equipment may be supplemented, replaced or modified with non-identical equipment without notice provided exemption status has not changed as defined in current district or federal rules. The equipment listed in Table 1 is a partial listing of equipment currently identified as exempt or insignificant and not required to obtain an operating permit pursuant to Rule 3.2 of the Yolo-Solano Air Quality Management District.

Table 1. Exempted And Insignificant Emissions Units (partial listing)

Insignificant Equipment Description	Basis for Exemption
Motor vehicles	District Rule 3.2, §101.1
Air conditioning, refrigeration, ventilating or vacuum cleaning systems not designed to remove air contaminants generated by equipment which would require a permit.	District Rule 3.2, §103
Combustion and heat transfer equipment: internal combustion engines <50 HP; combustion equipment with a maximum heat input of <1 million BTU/hour	District Rule 3.2, §105
Repairs or maintenance not involving structural changes to any equipment for which a permit has been granted.	District Rule 3.2, §108
Tanks, reservoirs, vessels, or other containers and their associated dispensing, pumping, and compression systems exclusively for the storage of liquified or compressed gases.	District Rule 3.2, §109
Unheated non-conveyorized solvent rinsing containers with an open surface area of 11 square feet or less providing no more than 25 gallons of solvent per year are evaporated or lost to the atmosphere.	District Rule 3.2, §110

Valves, flanges, unvented pressure vessels associated with insignificant activities, brazing, soldering, welding and cutting torches, and any other equipment providing that uncontrolled emissions never exceeds two (2) pounds in any 24 hour period.	District Rule 3.2, §113
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Significant Emissions Unit Information

Each of the sources has been constructed pursuant to issuance of an authority to construct in accordance with District Rules 3.1 and 3.4.

Identification Number: P-59-93(t)

Equipment Description: 14.645 Million btu/hour natural gas fired boiler

Control Equipment: Low NO_x burner with flue gas recirculation

Identification Number: P-82-96(t)

Equipment Description: 6.27 Million btu/hour natural gas fired boiler

Control Equipment: Low NO_x burner

Identification Number: P-19-79(a6)

Equipment Description: **Pre-Expansion equipment:** Two (2) PJX 4000D batch pre-expanders with fluidized bed dryers, 90 hp total. **Aging equipment:** Enclosed aging area with twenty (20) aging bags; heater serving aging room. **Block Molding Equipment:** 24' Nuova Idropress block mold at 78.5 total hp; 16' Nuova Idropress block mold at 88.5 total hp; Specialty Flotation mold at 2 hp; Geo Tech mold at 2.25 hp. **Block Processing Equipment:** Three (3) cutting lines with slabber, down cutter, conveyors and stretch wrap at 21.25 total hp; laminator and ancillary equipment at 5hp total; tongue and groove machine and ancillary equipment at 44.5 total hp; Holey Board and ancillary

equipment at 9 total hp; Tuff Roof and ancillary equipment at 3 total hp.

Control Equipment:

Aging room control system: enclosed aging area, with heated makeup air to be used when needed to maintain minimum operational temperature; captured emissions destroyed in a Regenerative Thermal Oxidizer (RTO). **Processing equipment control system:** surge chamber, drop out tank, and condenser; captured emissions are routed to the RTO, either directly or through the aging room. RTO for destruction of captured emissions, model #SSE15K-95X-RTO, serial # 2005-215-0306, 15,000 cfm.

II. SPECIFIC UNIT REQUIREMENTS

Emission Limits

Boilers

1. For the boiler operating under P-59-93(t), VOC emissions shall not exceed 0.9 lb/day, 53 lb/1st calendar quarter, 44 lb/2nd calendar quarter, 44 lb/3rd calendar quarter, 59 lb/4th calendar quarter, and 0.10 tons/year. [District Rule 3.4/C-96-42]
2. For the boiler operating under P-59-93(t), CO emissions shall not exceed 103.8 lb/day, 9,341 lb/1st calendar quarter, 8,312 lb/2nd calendar quarter, 8,312 lb/3rd calendar quarter, 9,549 lb/4th calendar quarter, and 18.89 tons/year. [Rule 3.4/C-96-42]
3. For the boiler operating under P-59-93(t), NO_x emissions shall not exceed 11.1 lb/day, 997 lb/1st calendar quarter, 889 lb/2nd calendar quarter, 889 lb/3rd calendar quarter, 1,019 lb/4th calendar quarter, and 2.02 tons/year. [District Rules 2.16 and 3.4/C-96-42]
4. For the boiler operating under P-59-93(t), SO_x emissions shall not exceed 0.2 lb/day, 11 lb/1st calendar quarter, 9 lb/2nd calendar quarter, 9 lb/3rd calendar quarter, 12 lb/4th calendar quarter, and 0.02 tons/year. [District Rules 2.12, 2.16, and 3.4/C-96-42]

5. For the boiler operating under P-59-93(t), PM10 emissions shall not exceed 4.6 lb/day, 254 lb/1st calendar quarter, 211 lb/2nd calendar quarter, 211 lb/3rd calendar quarter, 284 lb/4th calendar quarter, and 0.48 tons/year. [District Rules 2.11, 2.16, and 3.4/C-96-42]
6. For the boiler operating under P-82-96(t), VOC emissions shall not exceed 0.5 lb/day, 34 lb/1st calendar quarter, 26 lb/2nd calendar quarter, 26 lb/3rd calendar quarter, 33 lb/4th calendar quarter, and 0.06 tons/year. [District Rule 3.4/C-96-43]
7. For the boiler operating under P-82-96(t), CO emissions shall not exceed 44.4 lb/day, 4,000 lb/1st calendar quarter, 3,560 lb/2nd calendar quarter, 3,560 lb/3rd calendar quarter, 4,088 lb/4th calendar quarter, and 8.09 tons/year. [Rule 3.4/C-96-43]
8. For the boiler operating under P-82-96(t), NOx emissions shall not exceed 5.5 lb/day, 493 lb/1st calendar quarter, 440 lb/2nd calendar quarter, 440 lb/3rd calendar quarter, 504 lb/4th calendar quarter, and 1.00 tons/year. [District Rules 2.16 and 3.4/C-96-43]
9. For the boiler operating under P-82-96(t), SOx emissions shall not exceed 0.1 lb/day, 6 lb/1st calendar quarter, 4 lb/2nd calendar quarter, 4 lb/3rd calendar quarter, 6 lb/4th calendar quarter, and 0.01 tons/year. [District Rules 2.12, 2.16, and 3.4/C-96-43]
10. For the boiler operating under P-82-96(t), PM10 emissions shall not exceed 1.7 lb/day, 102 lb/1st calendar quarter, 44 lb/2nd calendar quarter, 44 lb/3rd calendar quarter, 59 lb/4th calendar quarter, and 0.18 tons/year. [District Rules 2.11, 2.16, and 3.4/C-96-43]
11. For boilers operating under P-59-93(t) and P-82-96(t), NOx emissions shall not exceed 0.036 lbs/MMBtu of heat input, or 30 ppmv, and CO emissions shall not exceed 400 ppmv, referenced at 3% O₂ dry stack gas conditions. [District Rule 2.27, §301]

Expanded Polystyrene Processing (EPS) Block Mold P-19-79(a6)

12. VOC emissions from the EPS Process (P-19-79(a6)) shall not exceed 5,444.2 lb/day, 111,615 lb/1st calendar quarter, 111,615 lb/2nd calendar quarter, 111,615 lb/3rd calendar quarter, 111,615 lb/4th calendar quarter, and 175.00 tons/year. [District Rule 3.4/C-07-195]

13. CO emissions from the EPS Process (P-19-79(a6)) shall not exceed 8.1 lb/day, 726 lb/1st calendar quarter, 734 lb/2nd calendar quarter, 742 lb/3rd calendar quarter, 742 lb/4th calendar quarter, and 1.47 tons/year. [District Rule 3.4/C-07-195]
14. NOx emissions from the EPS Process (P-19-79(a6)) shall not exceed 9.6 lb/day, 864 lb/1st calendar quarter, 874 lb/2nd calendar quarter, 883 lb/3rd calendar quarter, 883 lb/4th calendar quarter, and 1.75 tons/year. [District Rule 3.4/C-07-195]
15. SOx emissions from the EPS Process (P-19-79(a6)) shall not exceed 0.1 lb/day, 5 lb/1st calendar quarter, 5 lb/2nd calendar quarter, 5 lb/3rd calendar quarter, 5 lb/4th calendar quarter, 0.01 tons/year. [District Rules 2.12 and 3.4/C-07-195]
16. PM10 emissions from the EPS Process (P-19-79(a6)) shall not exceed 0.7 lb/day, 66 lb/1st calendar quarter, 66 lb/2nd calendar quarter, 67 lb/3rd calendar quarter, 67 lb/4th calendar quarter, and 0.13 tons/year. [District Rules 2.11, 2.19, and 3.4/C-07-195]

Throughput Limits

Boilers

17. For the boiler operating under P-59-93(t), the maximum amount of natural gas fuel consumption rate shall not exceed 0.33 million cubic feet/day, 18.50 million cubic feet/1st calendar quarter, 15.40 million cubic feet/2nd calendar quarter, 15.40 million cubic feet/3rd calendar quarter, 20.70 million cubic feet/4th calendar quarter, and 70.00 million cubic feet/year. [District Rule 3.4/C-96-42]
18. For the boiler operating under P-82-96(t), the maximum amount of natural gas fuel consumption rate shall not exceed 0.14 million cubic feet/day, 8.5 million cubic feet/1st calendar quarter, 6.6 million cubic feet/2nd calendar quarter, 6.6 million cubic feet/3rd calendar quarter, 8.3 million cubic feet/4th calendar quarter, and 30 million cubic feet/year. [District Rule 3.4/C-96-43]

EPS Block Mold P-19-79(a6)

19. The maximum amount of natural gas consumed by the EPS Process (P-19-79(a6)) shall not exceed 0.096 million cubic feet/day, 8.64 million cubic feet/1st calendar quarter, 8.74 million cubic feet/2nd calendar quarter, 8.83 million cubic feet/3rd calendar quarter, 8.83 million cubic feet/4th calendar quarter, and 35.04 million cubic feet/year. [District Rule 3.4/C-07-195]

20. The maximum amount of VOC's emitted from the EPS Process (P-19-79(a6)) shall not exceed 2.64 tons/day, 55.81 tons/1st calendar quarter, 55.81 tons/2nd calendar quarter, 55.81 tons/3rd calendar quarter, 55.81 tons/4th calendar quarter, and 175.00 tons/year. [District Rule 3.4/C-07-195]

Work Practice and Operational Requirements

Boilers

21. For the boiler operating under P-82-96(t), the permitted boiler shall not be fired on liquid fuel. [District Rule 3.4/C-96-43]

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22. The manufacturer's Certificate of Analysis (COA) for pentane content of any EPS resin used shall not exceed 5.5% by weight. [District Rule 3.4/C-07-195]
23. EPS resins with a manufacturer's COA for pentane content greater than 4.6% by weight shall be aged in the aging bags for 12 hours after pre-expansion. [District Rule 3.4/C-07-195]
24. The Permit Holder shall determine compliance with the quarterly and yearly permitted emission limits using the following equation for each different resin used: [District Rule 3.4/C-07-195]

$$\sum(RU_i \times \% RC_i) - (RU_i \times \% RC_i \times \%TC \times \%CE \times \%DE) - (RU_i \times \%PR) = \text{lb VOC}$$

Where:

RU_i	= Total amount of each resin used (lb)
$\% RC_i$	= % pentane content of each resin used, based on the manufacturer's COA for each batch
$\%TC$	= Total % pentane released which is available to be captured in process = calculated quarterly for material processed with the Idropress molds; 25.7% for material processed with the Geo Mold or Specialty Floatation Mold
$\%CE$	= Capture efficiency = 90%
DE	= Destruction efficiency = 97%

%PR = % pentane residual (%PR) remaining in product during storage as calculated quarterly.

25. The control system shall have a capture efficiency of at least 90% by weight of the pentane released that is available for capture. Emissions from all pre-expansion, aging, and block molding equipment (except specialty flotation and geo tech molds) shall be captured. [District Rule 3.4/C-07-195]
26. The control system shall have a destruction efficiency of at least 97% by weight for the captured VOC emissions. [District Rule 3.4/C-07-195]
27. The quarterly %TC value shall be calculated using a calendar quarter average of the monthly sample results. [District Rule 3.4/C-07-195]
28. The quarterly %PR value shall be calculated using the average of the three monthly sample results as follows: [District Rule 3.4/C-07-195]
 - a. For product shipped off-site before 14 days from date of manufacture, if the calendar quarter average %PR remaining meets or exceeds 1.0%, a value of 1.0% shall be used in the compliance demonstration calculation for that calendar quarter. If the calendar quarter average %PR remaining for product shipped off-site before 14 days from date of manufacture is less than 1.0%, the calendar quarter average %PR remaining shall be used in the compliance demonstration calculation for that calendar quarter.
 - b. For product shipped off-site between 14 and 30 days from date of manufacture if the calendar quarter average %PR remaining meets or exceeds 0.5%, a value of 0.5% shall be used in the compliance demonstration calculation for that calendar quarter. If the calendar quarter average %PR remaining for product shipped off-site between 14 and 30 days is less than 0.5%, the calendar quarter average %PR remaining shall be used in the compliance demonstration calculation for that calendar quarter.
 - c. For product shipped off-site greater than 30 days from date of manufacture, a value of 0% shall be used in the compliance demonstration calculation for that calendar quarter
29. Access doors and windows to the enclosed aging area shall remain closed during routine operation. The aging room shall comply with EPA method 204 for permanent total enclosures. [District Rule 3.4/C-07-195 & 40 CFR 64]

30. The RTO and the associated collection system shall be operated at all times that product is being processed in any portion of the processing line, and at all times that there is product in the aging room. [District Rule 3.4/C-07-195 & 40 CFR 64]
31. The air flow at the inlet to the RTO shall be no less than 10,823 cfm and no more than 13,228 cfm, as read by the flow meter installed immediately upstream of the RTO. [District Rule 3.4/C-07-195]
32. The aging room shall be maintained at or above 72.2 degrees Fahrenheit at all times that there is product in the aging room. [District Rule 3.4/C-07-195]
33. The negative pressure in the regrind area shall be maintained at a minimum of 0.007 inches water column while regrind processing is occurring. [District Rule 3.1, §402]
34. The RTO combustion chamber shall operate at a minimum temperature of 1400° F, or as determined by the initial source test. [40 CFR 64]
35. The RTO system inlet valve shall remain open at all times and the system bypass valve shall remain closed at all times that processing is occurring or bead is stored in the bag room. [40 CFR 64]
36. The surge/condensate tank pressure shall be maintained at either negative or atmospheric pressure.[40 CFR 64]
37. The negative pressure in the bag room shall be maintained at a minimum of 0.007 inches water column while bead processing is occurring and while any bead is undergoing aging in the bag room. [40 CFR 64]
38. The bag room vent valve shall remain closed at all times and the bag room exhaust blower shall remain off at all times, except when the lower explosive limit (LEL) reaches unsafe conditions in the bag room. [40 CFR 64]

Monitoring and Testing Requirements

Boilers

39. For the boilers operating under P-82-96(t) and P-59-93(t), the permittee shall install and maintain such facilities as are necessary for sampling and testing purposes. The number, size, and location of sampling ports shall be in accordance with Air Resources Board Test Method 1. The location and

access to the sampling platform shall be in accordance with the General Industry Safety Orders of the State of California. [District Rule 3.1, §303.2]

40. For the boiler operating under P-82-96(t), either a tune-up or compliance source test is required annually. A compliance source test for NO_x and CO shall be performed triennially. The source test shall be conducted in accordance with an approved source test protocol. The source test protocol shall be submitted to the District two weeks prior to the proposed test date. Source test results shall be submitted to the District compliance staff within 60 days of the test date. [District Rule 3.4/C-96-43]
41. For the boiler operating under P-59-93(t)), the District must be notified prior to any compliance source test, and a source test plan must be submitted for approval 14 days prior to testing. The results of the source test shall be submitted to the District within 60 days of the test date. [District Rule 3.1, §402]
42. An owner or operator shall have the option of complying with either the pounds-per-million-Btu emission rates or the parts-per-million-by-volume emission limits specified in Section 301. [District Rule 2.27, §402.1]
43. All emission determinations shall be made in the as-found operating condition, except that emission determinations shall include at a minimum at least one source test conducted at the maximum firing rate allowed by the District permit, and no compliance determination shall be established within two hours after a continuous period in which fuel flow to the unit is zero, or shut off, for thirty minutes or longer. [District Rule 2.27, §402.2]
44. All ppmv emission limits specified in Sections 110 and 301 of Rule 2.27 are referenced at dry stack-gas conditions and 3.00 percent by volume stack-gas oxygen. Emission concentrations shall be corrected to 3.00 percent oxygen as follows [District Rule 2.27, §402.3]:

$$[\text{ppm NO}_x]_{\text{corrected}} = \frac{20.95\% - 3.00\%}{20.95\% - [\% \text{O}_2]_{\text{measured}}} * [\text{ppm NO}_x]_{\text{measured}}$$

$$[\text{ppm CO}]_{\text{corrected}} = \frac{20.95\% - 3.00\%}{20.95\% - [\% \text{O}_2]_{\text{measured}}} * [\text{ppm CO}]_{\text{measured}}$$

45. All pounds-per-million-BTU emission rates shall be calculated as pounds of nitrogen dioxide (NO₂) per million Btu of heat input. [District Rule 2.27, §402.4]

46. All emission concentrations and emission rates shall be based on 15-consecutive-minute averages. These averages shall be calculated from no less than five data sets, recorded from sampling on intervals of no greater than three minutes. [District Rule 2.27, §402.5]
47. The owner or operator shall perform annual source tests in accordance with Section 502 or tune-ups in accordance with Section 600 to demonstrate compliance with this rule. If annual tune-ups are used to certify compliance, then the tune-up data demonstrating the equipment is operating within the parameters established during the initial source test must be submitted to the District. The Air Pollution Control Officer shall require additional source testing if the tune-up data indicates a deviation from the parameters established in the initial source test. [District Rule 2.27, §402.7]
48. The cumulative annual usage of each fuel shall be monitored from utility service meters, purchase, or tank fill records, or by any other acceptable methods approved by the Air Pollution Control Officer. [District Rule 2.27, §402.9]
49. Compliance with NO_x emission requirements and the stack-gas carbon monoxide and oxygen requirements of Section 300 of Rule 2.27 shall be determined using the following test methods:
 - a. Oxides of Nitrogen - ARB Method 100;
 - b. Carbon Monoxide - ARB Method 100;
 - c. Stack-gas oxygen - ARB Method 100;
 - d. NO_x emission rate (Heat Input Basis) - EPA Method 19 [District Rule 2.27 § 502.1]
50. Test methods other than those specified in Section 502.1 of Rule 2.27 for oxides of nitrogen, stack-gas oxygen, and stack-gas carbon monoxide, may be used to determine compliance so long as they are functionally equivalent and approved by the Air Pollution Control Officer. [District Rule 2.27 § 502.2]

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51. Source testing that is representative of the daily process at the site to demonstrate initial and on-going compliance shall be conducted for the following [District Rule 3.4/C-07-195 & 40 CFR 64]:

- a. Source testing to demonstrate compliance with the capture-efficiency in all controlled mold process equipment, RTO destruction efficiency, EPA method 204 for the aging room, and total % pentane available for capture in all controlled mold process equipment shall be conducted not less than once every 12 calendar months, as approved by the District;
 - b. Source testing to demonstrate %PR remaining in product shall be conducted once per calendar month on each type (i.e. uncut block, unlaminated cut product, and laminated cut product) of finished product for both less than 14 days and between 14 and 30 days from date of product manufacture, in accordance with SCAQMD laboratory method 306-91, or as approved by the District;
 - c. Source testing to demonstrate %TC, total % pentane released which is available to be captured in the process shall be conducted a minimum of once per calendar month on finished whole blocks, as approved by the District;
 - d. Source testing of airflow through the control system shall be conducted as approved by the District.
52. All source tests shall be conducted in such a manner as to be representative of process operation and shall be in accordance with a source test protocol approved by the District. The source test protocol shall specify the methodology, equipment to be used for collection and analysis of the source test samples and locations of the testing. Source test protocols shall be submitted to the District for review and written approval 30 days prior to the proposed date of the source test. The Permit Holder shall notify the District in writing three days prior to each residual content and control system airflow test and submit residual content and airflow test results to the District within 14 days of test completion. [District Rule 3.4/C-07-195 & 40 CFR 64]
53. The capture efficiency, destruction efficiency, and total % pentane available for capture source tests shall be conducted by a CARB certified independent contractor and source test results shall be submitted to the District within 60 days after the test date. [District Rule 3.4/C-07-195 & 40 CFR 64]
54. The RTO combustion chamber thermocouple and alarm shall be verified annually during the source test. The thermocouple shall read +/- 30 degrees F of the test measurement device. The alarm shall sound while the combustion chamber temperature is less than 1400 degrees F (or as determined by the initial source test. [40 CFR 64]

55. ___ The District must be notified prior to any sampling event used for compliance with permit conditions, and a protocol must be submitted for approval 14 days prior to testing. The protocol for sampling events is subject to District approval. The results of a sampling event shall be submitted to the District within 60 days of the test date. [District Rule 3.4/C-07-195]
56. Access to the enclosed regrind area shall remain closed during routine operation. The regrind area shall comply with EPA method 204 for permanent total enclosures. The PTE shall be verified annually at the source test. [District Rule 3.1, §402]
57. The enclosed regrind area pressure shall be continuously monitored by a manometer gauge for negative pressure. The gauge shall be checked at least once per operating day, while regrind operation is occurring, and shall be recorded daily by facility personnel. [District Rule 3.1, §402]
58. The Permit Holder shall continuously monitor and record the VOC concentration, in parts per million (ppm), of the air flow at the inlet of the RTO. The ppm monitor shall be checked at least once per day to verify proper operation. [District Rule 3.1, §402]
59. The Permit Holder shall continuously monitor, and record at least every 15 minutes, the ambient temperature of the aging room. Each occurrence of a 15 minute temperature reading that is below the permitted threshold shall be considered non-compliance with the Permit. The data shall be recorded with an electronic data recorder. [District Rule 3.4/C-07-195]
60. The Permit Holder shall continuously monitor and record the RTO combustion chamber temperature. The data shall be recorded with an electronic data recorder. The data values shall be averaged hourly for determination of an excursion. [40 CFR 64]
61. ___ The Permit Holder shall continuously monitor, and record upon occurrence of improper operation, the status of the RTO main bypass inlet valve and the bypass valve. The data shall be recorded with an electronic data recorder. Each improper operational occurrence is an excursion. [40 CFR 64]___
62. ___ The Permit Holder shall continuously monitor, and record at least every 15 minutes, the RTO inlet flow rate. The data shall be recorded with an electronic data recorder. The data values shall be averaged hourly for determination of an excursion. [40 CFR 64]

63. The Permit Holder shall continuously monitor, and record at least every 15 minutes, the surge/condensate tank pressure. The data shall be recorded with an electronic data recorder. The data values shall be averaged hourly for determination of an excursion. [40 CFR 64]
64. The Permit Holder shall continuously monitor, and record at least every 15 minutes, the bag room pressure. The data shall be recorded with an electronic data recorder. The data values shall be averaged hourly for determination of an excursion. [40 CFR 64]
65. The Permit Holder shall continuously monitor, and record upon occurrence of operation, the status of the bag room vent valve and the bag room exhaust blower. The data shall be recorded with an electronic data recorder. Each improper operational occurrence is an excursion. [40 CFR 64]
66. The Permit Holder shall inspect the RTO system daily for general wear, corrosion, and damage. These inspections shall be logged daily by facility personnel. [40 CFR 64]
67. The Permit Holder shall inspect the RTO inlet duct system, including all ductwork, fittings, and valves, weekly for leakage, integrity, corrosion, and damage. These inspections shall be logged weekly by facility personnel. [40 CFR 64]
68. The Permit Holder shall inspect the block mold collection system, including all ductwork, bags, fittings, and valves, weekly for leakage, integrity, corrosion, and damage. These inspections shall be logged weekly by facility personnel. [40 CFR 64]
69. The Permit Holder shall inspect the pre-expander collection system, including all ductwork, bags, fittings, and valves, weekly for leakage, integrity, corrosion, and damage. These inspections shall be logged weekly by facility personnel. [40 CFR 64]
70. The Permit Holder shall inspect the bag room containment daily to ensure that all doors are closed except while personnel are entering or exiting the enclosure. These inspections shall be logged daily by facility personnel. [40 CFR 64]
71. The Permit Holder shall inspect the bag room containment weekly, including all structural portions, natural draft openings, and doors, weekly for integrity, corrosion, and damage. These inspections shall be logged weekly by facility personnel. [40 CFR 64]

72. The RTO inlet flow meter shall be verified annually during the source test. The facility flow measurement shall read within 5% of the test measurement device. [40 CFR 64]
73. The surge/condensate tank pressure transducer and the bag room pressure transducer shall each be calibrated annually in accordance with the manufacturer's specifications. [40 CFR 64]

Recordkeeping Requirements

Boilers

74. The owner or operator shall, at least every twelve months, submit either source or tune-up test reports on each unit for each fuel burned, including any fuels which may be burned in accordance with Section 110 of Rule 2.27. For units complying with Section 302.2, of Rule 2.27, tune-up verification reports shall also be submitted not less than once every twelve months. Test reports shall include the operational characteristics of all flue-gas NOx reduction equipment that were monitored as required by Section 303.2 of Rule 2.27. [Rule 2.27, §403]
75. The permitted source shall monitor and record for each unit the Higher Heating Value (HHV) and cumulative annual usage of each fuel, including each nongaseous fuel, from utility service meters, purchase, or tank fill records, or by any other acceptable methods approved by the District. The records shall be updated weekly and made available to the District upon request. Historic annual data for the five (5) previous calendar years shall be kept and made available to the District upon request. [District Rule 2.27, §501 and Rule 3.8, §302.6]
76. The owner or operator shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup. This notification shall include the design heat input capacity of the affected facility and identification of fuels to be combusted. [40 CFR Part 60 Subpart Dc §60.48c(a)]
77. The owner or operator shall record and maintain records of the amounts of fuel combusted during each day. If requested by the permittee and agreed to in writing by the District and EPA Region 9, fuel usage may be recorded on a monthly basis. [40 CFR Part 60 Subpart Dc §60.48c(g)]

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78. The Permit Holder shall maintain the following records on a monthly basis [District Rule 3.4/C-07-195]:
- a. Throughput and initial pentane content (as determined by COA for each batch) of each EPS resin used;
 - b. Throughput and initial pentane content of each EPS resin processed in the Geo Mold and Specialty Flotation Mold;
 - c. %PR remaining in product used to calculate the calendar quarter average;
 - d. %TC monthly results used to calculate the calendar quarter average;
 - e. VOC emissions on a monthly, cumulative calendar quarter, and cumulative calendar year basis, including the backup calculations used to arrive at submitted numbers (in either paper or electronic form);
 - f. Amount of time each batch of materials remains in the aging room;
 - g. Amount of time product remains on site.
79. The Permit Holder shall submit a summary of the above records within 60 days following each calendar quarter. The records shall be maintained at the facility, for a period of five years, and made available for District inspection upon request. [District Rule 3.4/C-07-195]
80. The Permit Holder shall maintain daily records of the aging room temperature recordings. The data shall not be averaged for recordkeeping or compliance purposes. These records shall be maintained at the facility, for a period of five years, and shall be made available for District inspection upon request. [District Rule 3.4/C-07-195]
81. The Permit Holder shall maintain records of the enclosed regrind area containment pressure logs and VOC ppm monitor output for a period of at least five years. The records shall be retained on site and shall be made available to District personnel upon request. [District Rule 3.1, §402]
82. The Permit Holder shall maintain records of all required monitoring logs, including excursions, both from electronic recorders and facility personnel logs, for a period of at least 5 years. These records shall be maintained on site and shall be made available to District personnel upon request. [40 CFR 64]

83. Upon an accumulation of all excursions exceeding 5 percent duration of the total EPS molding operating time, the Permit Holder shall submit a quality improvement plan (QIP) consistent with 40 CFR 64.8(b). [40 CFR 64]

III. FACILITY WIDE REQUIREMENTS

Opacity

84. The permit holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:
- a. As dark or darker in shade as that designated as No. 2 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 subsection a. of this condition. [District Rule 2.3]

Nuisance

85. The permit holder shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property. [This permit condition is federally enforceable because it derives from District Rule 2.5 - Nuisance that is currently part of the California State Implementation Plan (SIP). The District is taking steps to remove Rule 2.5 from the SIP. Once the U.S. EPA has taken final action to remove District Rule 2.5 from the SIP, this permit condition will become state-enforceable only]

Circumvention

86. The permit holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California or District Rules or Regulations. [District Rule 2.17]

General Permit Requirements

87. No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the Air Pollution Control Officer as specified in Section 401 of District Rule 3.1. [District Rule 3.1 § 301.1]
88. No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the Air Pollution Control Officer. [District Rule 3.1 § 302.1]
89. No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the Air Pollution Control Officer or the Hearing Board. [District Rule 3.1 § 302.2]
90. The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1 § 405.3]
91. The Permit Holder shall firmly affix this permit to operate, an approved facsimile, or other approved identification bearing the permit number upon the facility, article, machine, equipment, or other contrivance in such a manner as to be clearly visible and accessible. In the event that the facility, article, machine, equipment, or other contrivance is so constructed or operated that the permit to operate cannot be so placed, the permit to operate shall be mounted so as to be clearly visible in an accessible place within 25 feet of the facility, article, machine, equipment, or other contrivance, or maintained readily available at all times on the operating premises. [District Rule 3.1, §408]
92. Commencing work or operation under this permit shall be deemed acceptance of all of the conditions so specified. [District Rule 3.1, §402]

93. The Permit Holder shall submit an annual throughput/production report at the end of each calendar year. This report is due no later than March 31 for the previous year. This report must include actual operating hours and actual amounts of materials processed (for materials that have process limits listed on the Permit to Operate). Each type of material and each type of process must be listed separately. [District Rule 3.1, §405.1]
94. This permit shall not be transferable, by operation of law or otherwise, from one location to another or from one piece of equipment to another. It shall be the transferee's responsibility to inform the District on assumption of ownership or operating control of any item under a permit from the District and for which a permit to operate will be required. For any such transfer as herein above described, said transferee shall submit an application for authorization in accordance with applicable District Rules. [District Rule 3.1, §304]

IV. TITLE V GENERAL REQUIREMENTS

Right of Entry

95. The permit shall require that the source allow the entry of the District, ARB, or U.S. EPA officials for the purpose of inspection and sampling, including:
 - a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
 - b. Inspection and duplication of records required by the permit to operate; and
 - c. Source sampling or other monitoring activities. [Rule 3.8 § 302.10]

Compliance with Permit Conditions:

96. The permittee shall comply with all Title V permit conditions. [Rule 3.8 § 302.11a]
97. The permit does not convey property rights or exclusive privilege of any sort. [Rule 3.8 § 302.11b]
98. Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [Rule 3.8 § 302.11c]

99. The permittee shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition. [Rule 3.8 § 302.11d]
100. A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [Rule 3.8 § 302.11e]
101. Within a reasonable time period, the permittee shall furnish any information requested by the APCO, in writing, for the purpose of determining:
 - a. Compliance with the permit; or
 - b. Whether or not cause exists for a permit or enforcement action. [Rule 3.8 § 302.11f]

Emergency Provisions:

102. Within two weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:
 - a. An emergency occurred;
 - b. The permittee can identify the cause(s) of the emergency;
 - c. The facility was being properly operated at the time of the emergency;
 - d. All steps were taken to minimize the emissions resulting from the emergency; and
 - e. Within two working days of the emergency event, the permittee provided the District with a description of the emergency and any mitigating or corrective actions taken; and

In any enforcement proceeding, the permittee has the burden of proof for establishing that an emergency occurred. [District Rule 3.8 § 302.12]

Severability

103. If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. [Rule 3.8 § 302.13]

Compliance Certification

104. The Responsible Official shall submit a compliance certification to the U.S. EPA and the APCO every twelve (12) months unless required more frequently by an applicable requirement. The twelve (12) month period will begin on the date that the Title V permit was originally issued, and will be due within thirty (30) days after the end of the reporting period, unless otherwise approved in writing by the District. All compliance reports and other documents required to be submitted to the District by the responsible official shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [District Rule 3.8, §302.14(a)]
105. The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. [Rule 3.8 § 302.14b]
106. The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [Rule 3.8 § 302.14c]
107. The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal Clean Air Act. [Rule 3.8 § 302.14d]

Permit Life

108. The Title V permit shall expire five years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [Rule 3.8 § 302.15]

Payment of Fees

109. An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [Rule 3.8 § 302.16]

Permit Revision Exemption

110. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

Application Requirements

111. An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. [Rule 3.8 § 402.2]
112. An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [Rule 3.8 § 402.3]
113. An owner or operator shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the owner or operator shall include the following:
 - a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
 - b. Proposed permit terms and conditions; and

- c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [Rule 3.8 § 402.4]

Permit Reopening for Cause

114. Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:
 - a. The need to correct a material mistake or inaccurate statement;
 - b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
 - c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is 3 years or greater, no later than 18 months after the promulgation of such requirement (where less than 3 years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
 - d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [Rule 3.8 § 413.1]

Recordkeeping

115. The permit holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:
 - a. Date, place, and time of sampling;
 - b. Operating conditions at the time of sampling;
 - c. Date, place, and method of analysis; and
 - d. Results of the analysis. [District Rule 3.8 § 302.6a]

116. The permit holder shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application. [District Rule 3.8 § 302.6b]

Reporting Requirements

117. Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection.[Rule 3.8 § 302.7a]
118. A semi-annual monitoring report shall be submitted at least every six (6) consecutive calendar months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7(a) of Rule 3.8. The six (6) month period will begin on the date that the Title V permit was originally issued, and will be due within thirty (30) days after the end of the reporting period, unless otherwise approved in writing by the District. [District 3.8, §302.7(b)]
119. All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [Rule 3.8 § 302.7c]
120. Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [Rule 3.8 § 302.7e]