



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



NOV 15 2011

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 # S-1112626**

Dear Mr. Rios:

The Air Pollution Control Officer has issued an Authority to Construct (S-1075-3-12) with a Certificate of Conformity to Styrotek. Styrotek is proposing to lower the NOX emissions limit of the previously installed ultra-low NOx burner from 15 ppmv of NOx to 9 ppmv.

Enclosed are copies of the Authority to Construct. The application and proposal were sent to US EPA Region IX on July 25, 2011. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

  
David Warner  
Director of Permit Services

Enclosures  
sdd

**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  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



NOV 15 2011

Mr. Dale Arthur  
Styrotek  
P.O. Box 1180  
Delano, CA 93216-1180

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)  
Project # S-1112626**

Dear Mr. Arthur:

The Air Pollution Control Officer has issued an Authority to Construct (S-1075-3-12) with a Certificate of Conformity to Styrotek. Styrotek is proposing to lower the NOX emissions limit of the previously installed ultra-low NOx burner from 15 ppmv of NOx to 9 ppmv.

Enclosed is the Authority to Construct and invoice. The application and proposal were sent to US EPA Region IX on July 25, 2011. 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. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,



David Warner  
Director of Permit Services

Enclosures  
sdd

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## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1075-3-12

**ISSUANCE DATE:** 11/15/2011

**LEGAL OWNER OR OPERATOR:** STYROTEK INC  
**MAILING ADDRESS:** PO BOX 1180  
DELANO, CA 93216-1180

**LOCATION:** 545 ROAD 176  
(ROAD 176 & AVENUE 4)  
DELANO, CA 93215

**SECTION:** NE32 **TOWNSHIP:** 24S **RANGE:** 26E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 16.33 MMBTU/HR NATURAL GAS/LPG FIRED CLEAVER BROOKS BOILER WITH A CLEAVER BROOKS, MODEL NTI-15400HP ULTRA LOW NOX BURNER AND AN INTERNAL FLUE GAS RECIRCULATION SYSTEM: LOWER PERMITTED NOX EMISSIONS LIMIT TO 9 PPMV @ 3% O2 FOR RULE 4320 COMPLIANCE

### 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 Rule 2201] 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
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The unit shall only be fired on PUC-regulated natural gas or commercial LPG. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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  
S-1075-3-12, Nov 15 2011 7:56AM - DAVIDSOS - Joint Inspection NOT Required

6. During start-up and shutdown, emissions from the exhaust of this boiler shall not exceed any of the following limits: 1.63 lb-NO<sub>x</sub>/hr; 2.42 lb-CO/hr; 0.05 lb-VOC/hr; 0.08 lb-PM<sub>10</sub>/hr; or 0.06 lb-SO<sub>x</sub>/hr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. The total duration of start-up and shutdown time shall not exceed 2.0 hours per day. [District Rules 2201,4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. Except during start-up and shutdown, while fired on natural gas, emissions from the exhaust of this boiler shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu; 200 ppmvd CO @ 3% O<sub>2</sub> or 0.148 lb-CO/MMBtu; 0.003 lb-VOC/MMBtu; 0.005 lb-PM<sub>10</sub>/MMBtu; or 0.00285 lb-SO<sub>x</sub>/MMBtu. [District Rules 2201,4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Except during start-up and shutdown, while fired on LPG, emissions from the exhaust of this boiler shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu; 200 ppmvd CO @ 3% O<sub>2</sub> or 0.148 lb-CO/MMBtu; 0.003 lb-VOC/MMBtu; 0.005 lb-PM<sub>10</sub>/MMBtu; or 0.0034 lb-SO<sub>x</sub>/MMBtu [District Rules 2201,4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. If the unit is fired on both natural gas and LPG during any calendar year, additional source testing for NO<sub>x</sub> and CO emissions shall be performed for any fuel that is fired for more than 100 hours during that calendar year and that has not been previously tested as a part of the facility's annual source testing requirement. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. Source testing to measure the VOC emissions from the boiler shall be conducted whenever the source testing for NO<sub>x</sub> and CO emissions is required and not less than once every 36 months using EPA Method 18 or EPA Method 25. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. The source test plan shall identify which fuel the source test is going to be performed on and the basis (ppmv or lb/MMBtu) that will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
17. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 , 4306, and 4320] Federally Enforceable Through Title V Permit
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 , 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. 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
22. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate during District inspection that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1070, 1081, and 4320]
26. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. The permittee shall maintain daily records of the start-up and shutdown durations and number of occurrences of each. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

Due Date
1/17/2012

Amount Due
\$ 529.00

ATCFEE S1112626  
1075 S97140 11/15/2011

Amount Enclosed

**RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO:**

STYROTEK, INC.  
PO BOX 1180  
DELANO, CA 93216-1180

SJVAPCD  
34946 Flyover Court  
Bakersfield, CA 93308

*Thank You!*



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

SJVAPCD Tax ID: 77-0262563

STYROTEK INC  
545 ROAD 176  
(ROAD 176 & AVENUE 4)  
DELANO, CA 93215

Facility ID	Invoice Date	Invoice Number
S1075	11/15/2011	S97140

Invoice Type
Project: S1112626

**PROJECT NUMBER: 1112626**

APPLICATION FILING FEES	\$ 71.00
ENGINEERING TIME FEES	\$ 529.00
TOTAL FEES	\$ 600.00
LESS PREVIOUSLY PAID PROJECT FEES APPLIED TO THIS INVOICE	(\$ 71.00)
<b>PROJECT FEES DUE (Enclosed is a detailed statement outlining the fees for each item.)</b>	<b>\$ 529.00</b>

Late Payment (see Rule 3010, Section 11.0 Late Fees)	
Postmarked	Total Due
After 1/17/2012 through 1/27/2012	\$ 581.90
After 1/27/2012	\$ 793.50
After 2/16/2012	Permits To Operate MAY BE SUSPENDED

San Joaquin Valley Air Pollution Control District  
34946 Flyover Court, Bakersfield, CA 93308, (661) 392-5500, Fax (661) 392-5585

**Invoice Detail**

Facility ID: S1075

STYROTEK INC  
 545 ROAD 176  
 (ROAD 176 & AVENUE 4)  
 DELANO, CA 93215

Invoice Nbr: S97140  
 Invoice Date: 11/15/2011  
 Page: 1

**Application Filing Fees**

Project Nbr	Permit Number	Description	Application Fee
S1112626	S-1075-3-12	MODIFICATION OF 16.33 MMBTU/HR NATURAL GAS/LPG FIRED CLEAVER BROOKS BOILER WITH A CLEAVER BROOKS, MODEL NTI-15400HP ULTRA LOW NOX BURNER AND AN INTERNAL FLUE GAS RECIRCULATION SYSTEM: LOWER PERMITTED NOX EMISSIONS LIMIT TO 9 PPMV @ 3% O2 FOR RULE 4320 COMPLIANCE	\$ 71.00

**Total Application Filing Fees: \$ 71.00**

**Engineering Time Fees**

Project Nbr	Quantity	Rate	Description	Fee
S1112626	6 hours	\$ 100.00 /h	Standard Engineering Time	\$ 600.00
			Less Credit For Application Filing Fees	(\$ 71.00)
			Standard Engineering Time SubTotal	\$ 529.00

**Total Engineering Time Fees: \$ 529.00**