



JUL 05 2011

Dale Arthur
Styrotek, Inc.
PO Box 1180
Delano, CA 93216-1180

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # S-1075
Project # S-1110307**

Dear Mr. Arthur:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Styrotek, Inc. for its plastic foam products manufacturing, 545 Road 176, Delano, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments
C: Juscellino Siongco, Permit Services Engineer

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



JUL 05 2011

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

**Re: Notice of Preliminary Decision – Title V Permit Renewal
District Facility # S-1075
Project # S-1110307**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Styrotek, Inc. for its plastic foam products manufacturing, 545 Road 176, Delano, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

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JUL 05 2011

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # S-1075
Project # S-1110307**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Styrotek, Inc. for its plastic foam products manufacturing, 545 Road 176, Delano, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

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Visalia Times-Delta

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED RENEWAL OF
THE FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Styrotek, Inc. for its plastic foam products manufacturing, 545 Road 176, Delano, California.

The District's analysis of the legal and factual basis for this proposed action, project #S-1110307, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested by the public, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed renewed permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation
Styrotek, Inc
S-1075**

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TITLE V PERMIT RENEWAL EVALUATION
Plastics Foam Products Manufacturing

Engineer: Juscelino Siongco
Date: June 30, 2011

Facility Number: S-1075
Facility Name: Styrotek, Inc
Mailing Address: PO Box 1180
Delano, CA 93216

Contact Name: Doug Shaffer
Phone: (661) 282-2200

Responsible Official: Dale Arthur
Title: General Manager

Project # : S-1110307
Deemed Complete: February 4, 2011

I. PROPOSAL

Styrotek, Inc. was issued a Title V permit on October 6, 2004. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

Styrotek Inc. is located at Road 176 & Avenue 4, Delano, in Kern County.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment D.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Templates:

a. Template SJV-UM-0-3 Facility Wide Umbrella

The applicant has requested to utilize template No. SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Renewed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

a. S-1075-0-2 – Facility-Wide Requirements

- Conditions 1 through 40 on the proposed permit are based on the Facility-Wide Umbrella Template SJV-UM-0-3.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

- District Rule 2020, Exemptions
(Amended September 21, 2006 ⇒ Amended December 20, 2007)
- District Rule 2201, New and Modified Stationary Source Review Rule
(Amended September 21, 2006 ⇒ Amended December 18, 2008)
- District Rule 4101, Visible Emissions
(Amended November 15, 2001 ⇒ Amended February 17, 2005)
- District Rule 4306, Boilers, Steam Generators, and Process Heaters – Phase 3
(Amended March 17, 2005 ⇒ Amended October 16, 2008)
- District Rule 4601, Architectural Coatings
(Amended October 31, 2001 ⇒ Amended December 17, 2009)
- District Rule 4682, Polystyrene, Polyethylene, and Polypropylene Products Manufacturing
(Amended June 16, 1994 ⇒ Amended September 20, 2007)
- District Rule 4702, Internal Combustion Engines – Phase 2
(Amended April 20, 2006 ⇒ Amended January 18, 2007)
- District Rule 8011, General Requirements
(Adopted November 15, 2001 ⇒ Amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities
(Adopted November 15, 2001 ⇒ Amended August 19, 2004)
- District Rule 8031, Bulk Materials
(Adopted November 15, 2001 ⇒ Amended August 19, 2004)
- District Rule 8041, Carryout and Trackout
(Adopted November 15, 2001 ⇒ Amended August 19, 2004)

- District Rule 8051, Open Areas
(Adopted November 15, 2001 ⇒ Amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads
(Adopted November 15, 2001 ⇒ Amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas
(Adopted November 15, 2001 ⇒ Amended September 16, 2004)

Following Rules are amended from previous Non-SIP version to correct SIP deficiencies and are now included in SIP.

- District Rule 4305, Boilers, Steam Generators, Process Heaters
(Amended December 19, 1996 ⇒ Amended August 21, 2003)
- District Rule 4701, Internal Combustion Engines
(amended November 12, 1998 ⇒ amended August 21, 2003)

B. Rules Not Updated

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4305, Boilers, Steam Generators, and Process Heaters – Phase 2 (amended August 21, 2003)

- District Rule 4701, Internal Combustion Engines – Phase 1 (amended August 21, 2003)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR Part 82, Subpart F, Stratospheric Ozone

C. Rules Not Applicable

- 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
- 40 CFR Part 60, Subpart DDD, Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry
- 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
- 40 CFR Part 63, Subpart JJJ, National Emissions Standard for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins
- 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit."

For this facility, the following are not federally enforceable and will not be discussed in further detail:

District Rule 4102 – Nuisance

a. S-1075-0-2 – Facility-Wide Requirements

- Condition 42 on the proposed permit is based on this rule.

b. S-1075-6-24 – Expanded Polystyrene Molding Operation

- Condition 8 on the proposed permit is based this rule.

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit.

A. District Rule 2020 – Exemptions

District Rule 2020 lists equipment which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any affect on current permit requirements and will therefore not be addressed in this evaluation.

B. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.24, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable at this time.

C. District Rule 2520 – Federally Mandated Operating Permits

The purpose of this rule is to provide for an administrative mechanism for issuing renewed operating permits for sources of air contaminants in accordance with requirements of 40 CFR Part 70–State Operating Permit Programs.

a. S-1075-3-11 – 16.33 MMBtu/hr Natural Gas/LPG-Fired Cleaver Brooks Boiler

- Condition 12 on the current permit is obsolete and removed from the proposed permit. Since the boiler no longer incinerates pentane vapors, this source testing condition to show compliance with the destruction efficiency of the boiler when incinerating pentane vapors is no longer needed.

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

D. District Rule 4306 – Boilers, Steam Generators, and Process Heaters – Phase 3

This rule applies to any boiler, steam generator or process heater, with a rated heat input greater than 5 million Btu per hour that is fired with gaseous and/or liquid fuels. The rule was amended in October 16, 2008.

The following permit requirements were added to ensure compliance with this rule:

a. S-1075-3-11 – 16.33 MMBtu/hr Natural Gas/LPG Fired Cleaver Brooks Boiler

- Conditions 4 through 12, 14 through 17, and 19 through 24 on the proposed permit assure compliance with the requirements of this rule.

b. S-1075-7-6 – 28.6 MMBtu/hr Cleaver-Brooks CB-700 Natural Gas/Propane-Fired Boiler

- Conditions 2, 3, 4, 7, 8, 10, 11 through 15, and 17 through 21 on the proposed permit assure compliance with the requirements of this rule.

E. District Rule 4682 – Polystyrene, Polyethylene, and Polypropylene Products Manufacturing

The purpose of this rule is to limit emissions of VOC and trichlorofluoromethane (CFC-11) and dichlorofluoromethane (CFC-12) from manufacturing and processing of products composed of polystyrene, polyethylene, or polypropylene and from the storage of VOC blowing agents.

The rule was amended in September 20, 2007 but had not been approved for inclusion in the District's State Implementation Plan (SIP). The stringency analysis in Attachment C shows that the amended rule is as stringent as the SIP approved version of the rule that was amended in June 16, 1994.

a. S-1075-6-24 – Expanded Polystyrene Molding Operations

- Conditions 1 and 2 on the current permit are not included in the proposed permit. Both conditions are subsumed by conditions 22 and 42 on the proposed facility-wide permit, S-1075-0-2.
- Conditions 10, 13, 14, 19, 20, 21, 26, and 33 on the proposed permit assure compliance with the requirements of this rule.

F. District Rule 4702 – Internal Combustion Engines – Phase 2

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. The rule was amended in January 18, 2007.

a. S-1075-5-4 – 75 bhp Detroit Diesel Model #1044710 Diesel-Fired Emergency IC Engine Powering a Firewater Pump

- Condition 1 on the current permit is not included in the proposed permit. The condition is subsumed by condition 22 on the proposed facility-wide permit, S-1075-0-2.
- Conditions 2, 4, 5, and 7 on the proposed permit assure compliance with the requirements of this rule.

b. S-1075-8-4 – 375 Bhp MAN Natural Gas-Fired Rich-Burn IC Engine with NSCR and PCV Powering an Air Compressor

- Conditions 1, 3, 6 through 15, 20, and 21 on the proposed permit assure compliance with the requirements of this rule.

G. 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

This subpart applies to each steam generating unit for which construction, modification, or reconstruction commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than 10 MMBtu/hr.

Permit units S-1075-3 and S-1075-7 are not subject to this subpart since the units were constructed prior to June 9, 1989 and had not undergone modification or reconstruction as defined in §60.14 and §60.15.

H. 40 CFR Part 60, Subpart DDD – Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry

§60.560 states that the provisions of this subpart apply to affected facilities involved in the manufacture of polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate).

This facility is not subject to the requirements of this subpart since the expansion of polystyrene beads is not a polystyrene manufacturing process.

I. 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

§60.4230 states that the provisions of this subpart are applicable to owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) that commence construction after June 12, 2006, where the stationary SI ICE are manufactured on or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 hp (except lean burn engines with a maximum engine power greater than or equal to 500 hp and less than 1,350 hp); on or after January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 hp and less than 1,350 hp; on or after July 1, 2008, for engines with a maximum engine power less than 500 hp; or on or after January 1, 2009, for emergency engines with a maximum engine power greater than 25 hp. It is also applicable to owners

and operators of stationary SI ICE that commence modification or reconstruction after June 12, 2006.

Permit unit S-1075-8 was installed prior to the applicability dates and had not been modified and reconstructed as defined in §60.14 and §60.15.

J. 40 CFR Part 63, Subpart JJJ – National Emissions Standard for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins

The provisions of this subpart apply to each existing and new affected source. An existing affected source is defined as each group of one or more thermoplastic product process units (TPPU) and associated equipment, as listed in §63.1310(a)(4).

The expansion of polystyrene beads at this facility does not involve any TPPU manufacturing any thermoplastic products. Therefore, this 40 CFR 63 subpart JJJ is not applicable.

K. 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. A facility is subject to this subpart if it owns or operates a stationary RICE at a major or area source of HAP emissions.

Per §63.2 of Subpart A, a major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.

§63.6585(c) An area source of HAP emissions is a source that is not a major source.

§63.6590(a)(1)(iii) states that for a stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if construction or reconstruction of the RICE commenced before June 12, 2006.

§63.6590(b)(3) states that a stationary RICE which is an existing spark ignition 4 stroke rich burn (4SRB) stationary RICE located at an area source

and an existing emergency stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part.

- a. S-1075-5-4 – 75 bhp Detroit Diesel Model #1044710 Diesel-Fired Emergency IC Engine Powering a Firewater Pump

This facility is not a major source of HAP emissions but is an area source of HAP emissions.

This emissions unit is existing per §63.6590(a)(1)(iii) above since it commenced construction on December 1992. Per §63.6590(b)(3), It is an emergency stationary RICE exempt from the requirements of this subpart.

- b. S-1075-8-4 – 375 Bhp MAN Natural Gas-Fired Rich-Burn IC Engine with NSCR and PCV Powering an Air Compressor

This facility is not a major source of HAP emissions but is an area source of HAP emissions.

This emissions unit is existing per §63.6590(a)(1)(iii) above since it commenced construction on July 2004. Per §63.6590(b)(3), It is an existing spark ignition 4SRB exempt from the requirements of this subpart.

L. 40 CFR Part 64 – Compliance Assurance Monitoring

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers;
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

- a. S-1075-3-11– 16.33 MMBtu/hr Cleaver Brooks Boiler with Ultra-Low NO_x Burner and Internal Flue Gas Recirculation System

This permit unit has emissions limits for SO_x, PM₁₀, CO, and VOC but it does not have add-on controls for these criteria pollutants. Therefore, this permit unit is not subject to CAM for SO_x, PM₁₀, CO, and VOC.

This permit may be subject to CAM for NO_x since there is a NO_x limit, and it has add-on controls in the form of FGR. However, the following calculation shows the pre-control NO_x potential to emit is less than the major source

threshold of 20,000 pounds NO_x/year as shown below. Therefore, this unit is not subject to CAM.

The natural gas controlled-low NO_x emission factor is 50 lb/MMscf or 0.049 lb/MMBtu (AP-42, 1.4-5, July 1998). The maximum rating for this unit is 16.33 MMBtu/hr.

$$16.33 \text{ MMBtu/hr} \times 0.049 \text{ lb NO}_x/\text{MMBtu} \times 8760 \text{ hrs/year} = 7,009 \text{ lbs NO}_x/\text{year}$$

b. S-1075-5-4 – 75 bhp Detroit Diesel Model #1044710 Diesel-Fired Emergency IC Engine Powering a Firewater Pump

This emissions unit is not subject to CAM since it does not have add-on controls for pollutants.

c. S-1075-6-24 – Expanded Polystyrene Molding Operation

This permit unit is currently subject to CAM and conditions 26, 27, 28, 30, and 31 assure compliance with this rule.

d. S-1075-7-6– 28.6 MMBtu/hr Cleaver Brooks Boiler with Ultra-Low NO_x Burner, FGR, and O₂ Trim System

This emissions unit has emissions limits for SO_x, PM₁₀, CO, and VOC but it does not have add-on controls for these criteria pollutants. Therefore, this emissions unit is not subject to CAM for SO_x, PM₁₀, CO, and VOC.

This emissions unit may be subject to CAM for NO_x since there is a NO_x limit, and it has add-on controls in the form of FGR. However, the following calculation shows the pre-control NO_x potential to emit is less than the major source threshold of 20,000 pounds NO_x/year as shown below. Therefore, this unit is not subject to CAM.

The natural gas controlled-low NO_x emission factor is 50 lb/MMscf or 0.049 lb/MMBtu (AP-42, 1.4-5, July 1998). The maximum rating for this unit is 16.33 MMBtu/hr.

$$28.6 \text{ MMBtu/hr} \times 0.049 \text{ lb NO}_x/\text{MMBtu} \times 8760 \text{ hrs/year} = 12,276 \text{ lbs NO}_x/\text{year}$$

e. S-1075-8-4 – 375 Bhp MAN Natural Gas-Fired Rich-Burn IC Engine with NSCR and PCV Powering an Air Compressor

This emissions unit has emissions limits for SO_x, and PM₁₀ but it does not have add-on controls for these criteria pollutants. Therefore, this emissions unit is not subject to CAM for SO_x, and PM₁₀.

This emissions unit may be subject to CAM for NO_x, CO, and VOC since it has NO_x, CO, and VOC emissions limits, and add-on control in the form of a non-selective catalytic reduction unit. However, the pre-control NO_x, CO, and VOC potential to emit is less than the major source threshold of 20,000 pounds/year for NO_x and VOC, and 200,000 lb/year for CO as shown below. Therefore, this unit is not subject to CAM.

From Table 3.2-3, AP-42, July 2000, the natural gas uncontrolled NO_x, CO, and VOC emission factors for 4-stroke rich-burn engine are 2.27 lb-NO_x/MMBtu, 3.72 lb-CO/MMBtu, and 0.0296 lb-VOC/MMBtu.

$$\begin{aligned} \text{NO}_x &= 2.27 \text{ lb-NO}_x/\text{MMBtu} \times 0.002545 \text{ MMBtu/bhp-hr} \times 375 \text{ bhp} \times 8760 \text{ hr/yr} \\ &= \underline{18,978 \text{ lb-NO}_x/\text{yr}} \end{aligned}$$

$$\begin{aligned} \text{VOC} &= 0.0296 \text{ lb-VOC/MMBtu} \times 0.002545 \text{ MMBtu/bhp-hr} \times 375 \text{ bhp} \times 8760 \text{ hr/yr} \\ &= \underline{248 \text{ lb-VOC/yr}} \end{aligned}$$

$$\begin{aligned} \text{CO} &= 3.72 \text{ lb-CO/MMBtu} \times 0.002545 \text{ MMBtu/bhp-hr} \times 375 \text{ bhp} \times 8760 \text{ hr/yr} \\ &= \underline{31,100 \text{ lb-CO/yr}} \end{aligned}$$

IX. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

1. Model General Permit Template SJV-UM-0-3

By submitting Model General Permit Template SJV-UM-0-1 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the

permit shields as granted in Model General Permit Template are included as conditions 39 and 40 of the facility-wide requirements (S-1075-0-2).

B. Requirements not Addressed by Model General Permit Templates

The applicant is requesting a permit shield for each of the requirements listed below:

1. District Rule 4201

The requirement of this rule is stated in condition 2 on permit S-1075-3-11, condition 1 on permit S-1075-5-4, condition 1 on permit S-1075-6-24, and condition 2 on permit S-1075-8-4. Therefore, a permit shield is being granted for these requirements in condition 26 on permit S-1075-3-11, condition 8 on permit S-1075-5-4, condition 36 on permit S-1075-6-24, and condition 22 on permit S-1075-8-4.

2. District Rule 4305

The requirements of this rule are stated in conditions 4 through 12, 14, 15, 16, 17, and 19 through 24 on permit S-1075-3-11 and conditions 2, 3, 4, 7, 8, 10 through 15, and 17 through 21. Therefore, a permit shield is being granted for these requirements in condition 26 on permit S-1075-3-11 and condition 22 on permit S-1075-7-6.

3. District Rule 4306

The requirements of this rule are stated in conditions 4 through 12, 14, 15, 16, 17, 19 through 25 on permit S-1075-3-11 and conditions 2, 3, 4, 7, 8, 10 through 15, and 17 through 21 on permit S-1075-7-6. Therefore, a permit shield is being granted for these requirements in condition 26 on permit S-1075-3-11 and condition 22 on permit S-1075-7-6.

4. District Rule 4682

The requirements of this rule are stated in conditions 10, 13, 14, 19, 20, 21, 26, 32, and 33 on permit S-1075-6-24. Therefore, a permit shield is being granted for these requirements in condition 36 on permit S-1075-6-24.

5. District Rule 4702

The requirements of this rule are stated in conditions 10, 13, 14, 19, 20, 21, 26, 32, and 33 on permit S-1075-6-24. Therefore, a permit shield is being granted for these requirements in condition 36 on permit S-1075-6-24.

6. Tulare County Rule 407

The requirement of this rule is stated in condition 26 on permit S-1075-3-11, condition 8 on permit S-1075-5-4, condition 2 on permit S-1075-6-24, condition 6 on permit S-1075-7-6, and condition 22 on permit S-1075-8-4. Therefore, a permit shield is being granted for this requirement in condition 27 on permit S-1075-3-11, condition 8 on permit S-1075-5-4, condition 36 on permit S-1075-6-24, condition 22 on permit S-1075-7-6, and condition 23 on permit S-1075-8-4.

7. 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

This subpart applies to each steam generating unit for which construction, modification, or reconstruction commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than 10 MMBtu/hr. The units in this facility were constructed prior to June 9, 1989 and had not undergone modification or reconstruction as defined in §60.14 and §60.15. Therefore, a permit shield is granted from this requirement in permit condition 28 on permit S-1075-3-11 and condition 23 on permit S-1075-7-6.

8. 40 CFR 72, Subpart A, Acid Rain Program General Provisions

Boilers and steam generators that produced electricity for sale in 1985 or on or after November 15, 1990 are subject to this rule. The boilers in this facility had not produced electricity for sale and not subject to this rule. Therefore, a permit shield is granted from this requirement in permit condition 28 on permit S-1075-3-11 and condition 23 on permit S-1075-7-6.

X. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

XI. ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. District Rule 4682 Stringency Analysis
- D. Detailed Facility List

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: S-1075-0-2

EXPIRATION DATE: 06/30/2009

FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: STYROTEK INC
Location: 545 ROAD 176, (ROAD 176 & AVENUE 4), DELANO, CA 93215
S-1075-0-2 : Apr 13 2011 10:42AM -- SIONGCCJ

9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

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FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. Should the facility, as defined in 40 CFR section 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 CFR section 68.10. The facility shall certify compliance as part of the annual certification as required by 40 CFR part 70. [40 CFR 68] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1075-3-11

EXPIRATION DATE: 06/30/2009

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

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. 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
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-regulated natural gas or commercial LPG. [District NSR Rule] Federally Enforceable Through Title V Permit
4. During start-up and shutdown, emissions from the exhaust of this boiler shall not exceed any of the following limits: 1.63 lb-NOx/hr; 2.42 lb-CO/hr; 0.05 lb-VOC/hr; 0.08 lb-PM10/hr; or 0.06 lb-SOx/hr. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
5. The total duration of start-up and shutdown time shall not exceed 2.0 hours per day. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
6. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
7. 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: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu; 200 ppmvd CO @ 3% O2 or 0.148 lb-CO/MMBtu; 0.003 lb-VOC/MMBtu; 0.005 lb-PM10/MMBtu; or 0.00285 lb-SOx/MMBtu. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
8. 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: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu; 200 ppmvd CO @ 3% O2 or 0.148 lb-CO/MMBtu; 0.003 lb-VOC/MMBtu; 0.005 lb-PM10/MMBtu; or 0.0034 lb-SOx/MMBtu [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
9. 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 and 4306] Federally Enforceable Through Title V Permit
10. Source testing to measure NOx 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 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. If the unit is fired on both natural gas and LPG during any calendar year, additional source testing for NO_x 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 and 4306] Federally Enforceable Through Title V Permit
12. 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 and 4306] Federally Enforceable Through Title V Permit
13. 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
14. NO_x 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 and 4306] Federally Enforceable Through Title V Permit
15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
17. 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 and 4306] Federally Enforceable Through Title V Permit
18. 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
19. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ 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 and 4306] Federally Enforceable Through Title V Permit
20. If either the NO_x or CO concentrations corrected to 3% O₂, 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 and 4306] Federally Enforceable Through Title V Permit
21. 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 and 4306] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (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 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

23. The permittee shall maintain daily records of the start-up and shutdown durations and number of occurrences of each. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. 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, 4305 and 4306] Federally Enforceable Through Title V Permit
25. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Tulare County Rule 407] Federally Enforceable Through Title V Permit
26. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Tulare County Rule 407, SJVUAPCD Rules 1081, 4201, 4305, 4306, and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
27. This unit commenced construction prior to June 9, 1989. This unit has not been used to produce electricity for sale. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1075-5-4

EXPIRATION DATE: 06/30/2009

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

EQUIPMENT DESCRIPTION:

75 BHP DETROIT DIESEL MODEL #1044710 DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

PERMIT UNIT REQUIREMENTS

1. {2414} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
2. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 4.3 and 17 CCR 93115] Federally Enforceable Through Title V Permit
3. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District NSR Rule and 17 CCR 93115] Federally Enforceable Through Title V Permit
4. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 4.3 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4702, 6.2 and 2520, 9.3.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [District Rule 2520, 9.3.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. 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 4702, 6.2 and 2520, 9.4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Tulare County Rule 407] Federally Enforceable Through Title V Permit
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Tulare County Rule 407, SJVUAPCD Rules 4201, 4702, and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1075-6-24

EXPIRATION DATE: 06/30/2009

SECTION: NE32 TOWNSHIP: 24S RANGE: 26E

EQUIPMENT DESCRIPTION:

EXPANDED POLYSTYRENE MOLDING OPERATION, INCLUDING PRE-EXPANDER AREA, PRODUCTION AREA, AND 3.0 MM BTU/HR NATURAL GAS/LPG FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SERVING PENTANE VAPOR CONTROL SYSTEM

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Tulare County 407] Federally Enforceable Through Title V Permit
3. Pre-expander area shall include two continuous pre-expanders, one batch pre-expander, and associated bead dryers, bin hoppers, blowers, screeners, screw conveyors, and twenty-eight 1,800 cubic foot capacity pre-expanded bead storage silos. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Production area shall include thirty-nine presses, belt conveyors, vacuum pumps, vacuum blowers and exhaust blowers. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Pentane control system shall include vapor collection piping network serving vacuum systems, molding machines and water drain vents and one regenerative thermal oxidizer (RTO). [District NSR Rule] Federally Enforceable Through Title V Permit
6. RTO shall incinerate VOC's recovered from the pre-expander(s), bead storage silo(s), or molding machine(s) at any time these units are in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
7. RTO shall be equipped with an operational temperature gauge to indicate the temperature of the combustion chamber. A continuously recording device shall be utilized to indicate the combustion chamber temperature during operation. [District NSR Rule] Federally Enforceable Through Title V Permit
8. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
9. Sampling ports adequate for extraction of grab samples, measurement of gas flow rate, and use of an FID, PID, or other District-approved VOC detection device shall be provided for both the influent and the effluent gas streams. [District Rule 1081] Federally Enforceable Through Title V Permit
10. Pentane content of raw bead supply shall not exceed 4.2% by weight on an annual average basis. [District NSR Rule and 4682] Federally Enforceable Through Title V Permit
11. Raw beads processed shall not exceed 128,310 pounds/day nor 32,027,500 pounds/year. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Only natural gas and propane shall be used as auxiliary fuel for the combustion of VOC. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

13. Minimum volatile organic compound control efficiency across RTO shall be 99% by weight. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
14. Minimum VOC (pentane) capture and control efficiency, calculated as VOC vapor capture efficiency multiplied times RTO control efficiency divided by 100, shall be 93% by weight. [District NSR Rule and 4682] Federally Enforceable Through Title V Permit
15. The total VOC emissions from the EPS molding operation including fugitive and RTO combustion emissions shall not exceed 140.0 pounds in any one day nor 34,982 lb/year. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The minimum operating temperature for the combustion chamber of the RTO shall be maintained at or above 1400 degrees F. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Combustion emission rates from RTO shall not exceed any of the following: NO_x (as NO₂): 117.0 ppmv @ 3% O₂ or 0.142 lb/MMBTU, CO: 100 ppmv @ 3% O₂ or 0.0737 lb/MMBTU, SO_x (as SO₂) 0.0164 lb/MMBtu, PM₁₀: 0.0076 lb/MMBtu, nor VOC: 0.0054 lb/MMBTU. [District NSR Rule] Federally Enforceable Through Title V Permit
18. RTO inlet ductwork and exhaust stack shall be equipped with adequate provisions facilitating the collection of samples from both the influent and the effluent gas stream sampling ports consistent with EPA test methods, i.e. capped sample port in accessible location of uniform flow. [District Rule 1081] Federally Enforceable Through Title V Permit
19. Permittee shall monitor and record pressure upstream of the condenser (water knockout box) on a weekly basis to document that the system is under vacuum. [District NSR Rule and 4682] Federally Enforceable Through Title V Permit
20. Vapor control system capture efficiency shall be demonstrated within 60 days of startup and annually thereafter by using the following calculation procedure: $e \times f / (a \times b - c \times d)$ where a = pentane content of raw beads (lb/ton), b = raw bead input rate (tons/hr), c = pentane content of product (lb/ton), and d = product output rate (tons/hr), e = pentane vapor concentration at RTO inlet (lb/scf), f = flow rate into RTO (scf/hr). [District Rules 1070 and 4682] Federally Enforceable Through Title V Permit
21. For demonstration of vapor control system capture efficiency through source testing, at least three test runs covering at least one production cycle and at least 3 hours and no more than 24 hours in duration shall be conducted to determine capture efficiency. Protocols for data analysis must either meet the data quality objective (DQO) or lower confidence limit (LCL) approaches as described in EPA "Guidelines for Determining Capture Efficiency." January 9, 1995 and 40 CFR 51 Appendix M, Methods 204-204F, as applicable. [District NSR Rule and 4682] Federally Enforceable Through Title V Permit
22. Source testing to measure the VOC emissions from the RTO and RTO control efficiency shall be conducted annually. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
24. 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. [District Rule 1081] Federally Enforceable Through Title V Permit
25. 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
26. During the operation of the RTO, the permittee shall monitor and record combustion chamber temperatures at least once every 15 minutes. The temperature readings shall be at or above 1,400 F during which the pentane vapors are being combusted in the RTO. Upon detecting any excursion below the 1,400 F temperature reading, 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 Rule 4682 and 40 CFR part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

27. The RTO's burner and its associated components and the vapor collection system shall be inspected thoroughly on an annual basis. The records of inspection shall at least contain date and time of inspection, identification of the person performing an inspection, parts replacement and repairs, and all maintenance actions taken. The records shall be kept and maintained for compliance inspection upon request. [40 CFR part 64] Federally Enforceable Through Title V Permit
28. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
29. Vapor control system shall be visually and audibly inspected for leaks weekly. [District NSR Rule] Federally Enforceable Through Title V Permit
30. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
31. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), 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
32. Permittee shall maintain daily records of RTO temperature, raw bead pentane content and pounds of raw beads processed and make such records readily available for District inspection for a period of five years. [District Rule 1070 and District Rule 4682] Federally Enforceable Through Title V Permit
33. Permittee shall maintain records of vapor control system capture efficiency and RTO control efficiency and make such records readily available for District inspection for a period of five years. [District Rules 1070 and 4682] Federally Enforceable Through Title V Permit
34. Permittee shall maintain a record of all periods of non-operation of the RTO, including the dates, duration and reason(s) for the unit not being operated. [District NSR Rule] Federally Enforceable Through Title V Permit
35. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Tulare County Rule 407, SJVUAPCD Rules 1081, 4201, and 4682. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1075-7-6

EXPIRATION DATE: 06/30/2009

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

EQUIPMENT DESCRIPTION:

28.6 MMBTU/HR CLEAVER-BROOKS MODEL CB-700 SYSTEM 20 NATURAL GAS/PROPANE-FIRED BOILER WITH A CLEAVER-BROOKS MODEL NTI-15-700 ULTRA LOW NOX BURNER, FGR, AND O2 TRIM SYSTEM

PERMIT UNIT REQUIREMENTS

1. The unit shall only be fired on PUC-regulated natural gas, and propane. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Except during startup and shutdown, emissions shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.008 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2, or 0.0055 lb-VOC/MMBtu. [District NSR Rule, 4305, and 4306] Federally Enforceable Through Title V Permit
3. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 4305 & 4306] Federally Enforceable Through Title V Permit
4. Permittee shall maintain records of duration of each start-up and shutdown for a period of five years and make such records readily available for District inspection upon request. [District Rules 2080, 4305 & 4306] Federally Enforceable Through Title V Permit
5. Emissions of NOx shall not exceed 5.8 lb/day or 2004 lb/yr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Tulare County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
7. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District NSR Rule, 4305 and 4306] Federally Enforceable Through Title V Permit
8. Source testing to measure natural gas-combustion NOx 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 and 4306] Federally Enforceable Through Title V Permit
9. 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
10. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
11. NOx 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 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
13. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
14. 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 and 4306] Federally Enforceable Through Title V Permit
15. 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 and 4306] Federally Enforceable Through Title V Permit
16. 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
17. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ 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 and 4306] Federally Enforceable Through Title V Permit
18. If either the NO_x or CO concentrations corrected to 3% O₂, 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 and 4306] Federally Enforceable Through Title V Permit
19. 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 and 4306] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (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 and 4306] Federally Enforceable Through Title V Permit
21. 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, 4305, and 4306] Federally Enforceable Through Title V Permit
22. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Tulare County Rule 407, SJVUAPCD Rules 1081, 4305, and 4306. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
23. This unit commenced construction prior to June 9, 1989. This unit has not been used to produce electricity for sale. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1075-8-4

EXPIRATION DATE: 06/30/2009

EQUIPMENT DESCRIPTION:

375 BHP MAN MODEL E2842 E302/E312 NATURAL GAS-FIRED RICH-BURN IC ENGINE WITH NSCR AND PCV POWERING AN AIR COMPRESSOR

PERMIT UNIT REQUIREMENTS

1. Engine shall be equipped with a nonresettable elapsed operating time meter. In lieu of a nonresettable elapsed operating time meter, the owner or operator may use an alternative device, method, or technique in determining operating time provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
2. Particulate emissions shall not exceed at the point of discharge, 0.1 gr/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Emissions from this natural gas-fired IC engine shall not exceed any of the following limits: 5 ppmvd NO_x @ 15% O₂ (equivalent to 0.07 g-NO_x/hp-hr), 70 ppmvd CO @ 15% O₂ (equivalent to 0.6 g-CO/hp-hr), or 30 ppmvd VOC @ 15% O₂ (equivalent to 0.15 g-VOC/hp-hr). [District NSR Rule and District Rules 4701 and 4702, 5.1] Federally Enforceable Through Title V Permit
4. Emissions from this natural gas-fired IC engine shall not exceed either of the following limits: 0.0094 g-SO_x/hp-hr or 0.02 g-PM₁₀/hp-hr. Compliance with these limits shall be shown by using natural gas with a sulfur content less than or equal to 1.0 gr S/100 scf. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Natural gas sulfur content shall not exceed 1.0 gr S/100 scf. [District NSR Rule and District Rule 4801] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ 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 engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702, 5.6.1.1, 5.6.9, 6.5.2, 6.5.7] Federally Enforceable Through Title V Permit
7. If either the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, 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 the performing the notification and testing required by this condition. [District Rules 4701 and 4702, 6.5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

8. 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 4701 and 4702, 5.6.9, 6.5.7] Federally Enforceable Through Title V Permit
9. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 15% O₂, (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 4701 and 4702, 6.5.8] Federally Enforceable Through Title V Permit
10. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 5.6.7, 6.5.6] Federally Enforceable Through Title V Permit
11. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit
12. Source testing to measure natural gas-combustion NO_x, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rules 4701 and 4702, 6.3.2] Federally Enforceable Through Title V Permit
13. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701 and 4702, 6.3.3] Federally Enforceable Through Title V Permit
14. 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. VOC emissions shall be reported as methane. VOC, NO_x, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701 and 4702, 6.3.3] Federally Enforceable Through Title V Permit
15. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 4701, and 4702, 6.4] Federally Enforceable Through Title V Permit
16. 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
17. If the engine is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the fuel being fired in the IC engine shall be determined using ASTM method D 2784, D 1072, D 3246, D 4084, D 6228, or grab sample analysis by double GC for H₂S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested each quarter, but only if the engine is operated in that calendar quarter. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

20. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 4701 and 4702, 6.2.1] Federally Enforceable Through Title V Permit
21. 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 2520, 9.4.2, 4701, and 4702, 6.2.2] Federally Enforceable Through Title V Permit
22. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Tulare County Rule 407] Federally Enforceable Through Title V Permit
23. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Tulare County Rule 407, SJVUAPCD Rules 1081, 4201, 4701, and 4702. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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ATTACHMENT B

Previous Title V Operating Permit



Permit to Operate

FACILITY: S-1075

EXPIRATION DATE: 06/30/2009

LEGAL OWNER OR OPERATOR:
MAILING ADDRESS:

STYROTEK INC
PO BOX 1180
DELANO, CA 93216-1180

FACILITY LOCATION:

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

FACILITY DESCRIPTION:

PLASTICS FOAM PRODUCTS

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: S-1075-0-1

EXPIRATION DATE: 06/30/2009

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: STYROTEK INC
Location: 545 ROAD 176, (ROAD 176 & AVENUE 4), DELANO, CA 93215
S-1075-0-1: Apr 13 2011 10:43AM - SIONGCOJ

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. On October 31, 2004, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. Should the facility, as defined in 40 CFR section 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 CFR section 68.10. The facility shall certify compliance as part of the annual certification as required by 40 CFR part 70. [40 CFR 68] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1075-3-10

EXPIRATION DATE: 06/30/2009

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

EQUIPMENT DESCRIPTION:

16.33 MMBTULHR 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

PERMIT UNIT REQUIREMENTS

1. 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
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-regulated natural gas or commercial LPG. [District NSR Rule] Federally Enforceable Through Title V Permit
4. During start-up and shutdown, emissions from the exhaust of this boiler shall not exceed any of the following limits: 1.63 lb-NOx/hr; 2.42 lb-CO/hr; 0.05 lb-VOC/hr; 0.08 lb-PM10/hr; or 0.06 lb-SOx/hr. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
5. The total duration of start-up and shutdown time shall not exceed 2.0 hours per day. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
6. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
7. 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: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu; 200 ppmvd CO @ 3% O2 or 0.148 lb-CO/MMBtu; 0.003 lb-VOC/MMBtu; 0.005 lb-PM10/MMBtu; or 0.00285 lb-SOx/MMBtu. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
8. 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: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu; 200 ppmvd CO @ 3% O2 or 0.148 lb-CO/MMBtu; 0.003 lb-VOC/MMBtu; 0.005 lb-PM10/MMBtu; or 0.0034 lb-SOx/MMBtu [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
9. 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 and 4306] Federally Enforceable Through Title V Permit
10. Source testing to measure NOx 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 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

11. If the unit is fired on both natural gas and LPG during any calendar year, additional source testing for NO_x 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 and 4306] Federally Enforceable Through Title V Permit
12. Source testing to measure the VOC emissions from the boiler shall be conducted whenever the source testing for NO_x 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
13. 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 and 4306] Federally Enforceable Through Title V Permit
14. 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
15. NO_x 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 and 4306] Federally Enforceable Through Title V Permit
16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
17. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
18. 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 and 4306] Federally Enforceable Through Title V Permit
19. 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
20. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ 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 and 4306] Federally Enforceable Through Title V Permit
21. If either the NO_x or CO concentrations corrected to 3% O₂, 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 and 4306] Federally Enforceable Through Title V Permit
22. 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 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

23. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (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 and 4306] Federally Enforceable Through Title V Permit
24. The permittee shall maintain daily records of the start-up and shutdown durations and number of occurrences of each. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
25. 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 and 4306] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1075-5-3

EXPIRATION DATE: 06/30/2009

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

EQUIPMENT DESCRIPTION:

75 BHP DETROIT-DIESEL MODEL #1044710 EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101, 5.1] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
3. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 4.3 and 17 CCR 93115] Federally Enforceable Through Title V Permit
4. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 4.3 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4702, 6.2 and 2520, 9.4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [District Rule 2520, 9.4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. 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 4702, 6.2 and 2520, 9.4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1075-6-23

EXPIRATION DATE: 06/30/2009

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

EQUIPMENT DESCRIPTION:

EXPANDED POLYSTYRENE MOLDING OPERATION, INCLUDING PRE-EXPANDER AREA, PRODUCTION AREA, AND 3.0 MM BTU/HR NATURAL GAS/LPG FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SERVING PENTANE VAPOR CONTROL SYSTEM

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
5. Pre-expander area shall include two continuous pre-expanders, one batch pre-expander, and associated bead dryers, bin hoppers, blowers, screeners, screw conveyors, and twenty-eight 1,800 cubic foot capacity pre-expanded bead storage silos. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Production area shall include thirty-nine presses, belt conveyors, vacuum pumps, vacuum blowers and exhaust blowers. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Pentane control system shall include vapor collection piping network serving vacuum systems, molding machines and water drain vents and one regenerative thermal oxidizer (RTO). [District Rule 2201] Federally Enforceable Through Title V Permit
8. RTO shall incinerate VOC's recovered from the pre-expander(s), bead storage silo(s), or molding machine(s) at any time these units are in operation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. RTO shall be equipped with an operational temperature gauge to indicate the temperature of the combustion chamber. A continuously recording device shall be utilized to indicate the combustion chamber temperature during operation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
11. Sampling ports adequate for extraction of grab samples, measurement of gas flow rate, and use of an FID, PID, or other District-approved VOC detection device shall be provided for both the influent and the effluent gas streams. [District Rule 1081] Federally Enforceable Through Title V Permit
12. Pentane content of raw bead supply shall not exceed 4.2% by weight on an annual average basis. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

13. Raw beads processed shall not exceed 128,310 pounds/day nor 32,027,500 pounds/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Only natural gas and propane shall be used as auxiliary fuel for the combustion of VOC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Minimum volatile organic compound control efficiency across RTO shall be 99% by weight. [District Rule 2201 and District Rule 4682] Federally Enforceable Through Title V Permit
16. Minimum VOC (pentane) capture and control efficiency, calculated as VOC vapor capture efficiency multiplied times RTO control efficiency divided by 100, shall be 93% by weight. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
17. The total VOC emissions from the EPS molding operation including fugitive and RTO combustion emissions shall not exceed 140.0 pounds in any one day nor 34,982 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The minimum operating temperature for the combustion chamber of the RTO shall be maintained at or above 1400 degrees F. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Combustion emission rates from RTO shall not exceed any of the following: NO_x (as NO₂): 117.0 ppmv @ 3% O₂ or 0.142 lb/MMBTU, CO: 100 ppmv @ 3% O₂ or 0.0737 lb/MMBTU, SO_x (as SO₂) 0.0164 lb/MMBTU, PM₁₀: 0.0076 lb/MMBTU, nor VOC: 0.0054 lb/MMBTU. [District Rule 2201] Federally Enforceable Through Title V Permit
20. RTO inlet ductwork and exhaust stack shall be equipped with adequate provisions facilitating the collection of samples from both the influent and the effluent gas stream sampling ports consistent with EPA test methods, i.e. capped sample port in accessible location of uniform flow. [District Rule 1081] Federally Enforceable Through Title V Permit
21. Permittee shall monitor and record pressure upstream of the condenser (water knockout box) on a weekly basis to document that the system is under vacuum. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
22. Vapor control system capture efficiency shall be demonstrated within 60 days of startup and annually thereafter by using the following calculation procedure: $e \times f / (a \times b - c \times d)$ where a = pentane content of raw beads (lb/ton), b = raw bead input rate (tons/hr), c = pentane content of product (lb/ton), and d = product output rate (tons/hr), e = pentane vapor concentration at RTO inlet (lb/scf), f = flow rate into RTO (scf/hr). [District Rules 1070 and 4782] Federally Enforceable Through Title V Permit
23. For demonstration of vapor control system capture efficiency through source testing, at least three test runs covering at least one production cycle and at least 3 hours and no more than 24 hours in duration shall be conducted to determine capture efficiency. Protocols for data analysis must either meet the data quality objective (DQO) or lower confidence limit (LCL) approaches as described in EPA "Guidelines for Determining Capture Efficiency." January 9, 1995 and 40 CFR 51 Appendix M, Methods 204-204F, as applicable. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
24. Source testing to measure the VOC emissions from the RTO and RTO control efficiency shall be conducted annually. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
26. 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. [District Rule 1081] Federally Enforceable Through Title V Permit
27. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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28. During the operation of the RTO, the permittee shall monitor and record combustion chamber temperatures at least once every 15 minutes. The temperature readings shall be at or above 1,400 F during which the pentane vapors are being combusted in the RTO. Upon detecting any excursion below the 1,400 F temperature reading, 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 Rule 4682 and 40 CFR part 64] Federally Enforceable Through Title V Permit
29. The RTO's burner and its associated components and the vapor collection system shall be inspected thoroughly on an annual basis. The records of inspection shall at least contain date and time of inspection, identification of the person performing an inspection, parts replacement and repairs, and all maintenance actions taken. The records shall be kept and maintained for compliance inspection upon request. [40 CFR part 64] Federally Enforceable Through Title V Permit
30. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
31. Vapor control system shall be visually and audibly inspected for leaks weekly. [District Rule 2201] Federally Enforceable Through Title V Permit
32. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
33. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), 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
34. Permittee shall maintain daily records of RTO temperature, raw bead pentane content and pounds of raw beads processed and make such records readily available for District inspection for a period of five years. [District Rule 1070 and District Rule 4682] Federally Enforceable Through Title V Permit
35. Permittee shall maintain records of vapor control system capture efficiency and RTO control efficiency and make such records readily available for District inspection for a period of five years.. [District Rules 1070 and 4782] Federally Enforceable Through Title V Permit
36. Permittee shall maintain a record of all periods of non-operation of the RTO, including the dates, duration and reason(s) for the unit not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
37. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1075-7-5

EXPIRATION DATE: 06/30/2009

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

EQUIPMENT DESCRIPTION:

28.6 MMBTU/HR CLEAVER-BROOKS MODEL CB-700 SYSTEM 20 NATURAL GAS/PROPANE-FIRED BOILER WITH A CLEAVER-BROOKS MODEL NTI-15-700 ULTRA LOW NOX BURNER, FGR, AND O2 TRIM SYSTEM

PERMIT UNIT REQUIREMENTS

1. The unit shall only be fired on PUC-regulated natural gas, and propane. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Except during startup and shutdown, emissions shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.008 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
3. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 4305 & 4306] Federally Enforceable Through Title V Permit
4. Permittee shall maintain records of duration of each start-up and shutdown for a period of five years and make such records readily available for District inspection upon request. [District Rules 2080, 4305 & 4306] Federally Enforceable Through Title V Permit
5. Emissions of NOx shall not exceed 5.8 lb/day or 2004 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Tulare County Rules 407 and District Rule 4801] Federally Enforceable Through Title V Permit
7. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
8. Source testing to measure natural gas-combustion NOx 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 and 4306] Federally Enforceable Through Title V Permit
9. 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
10. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
11. NOx 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 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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12. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
13. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
14. 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 and 4306] Federally Enforceable Through Title V Permit
15. 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 and 4306] Federally Enforceable Through Title V Permit
16. 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
17. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ 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 and 4306]
18. If either the NO_x or CO concentrations corrected to 3% O₂, 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 and 4306]
19. 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 and 4306]
20. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (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 and 4306]
21. 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, 4305, and 4306] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1075-8-3

EXPIRATION DATE: 06/30/2009

EQUIPMENT DESCRIPTION:

375 BHP MAN MODEL E2842 E302/E312 NATURAL GAS-FIRED RICH-BURN IC ENGINE WITH NSCR AND PCV POWERING AN AIR COMPRESSOR

PERMIT UNIT REQUIREMENTS

1. Engine shall be equipped with a nonresettable elapsed operating time meter. In lieu of a nonresettable elapsed operating time meter, the owner or operator may use an alternative device, method, or technique in determining operating time provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
2. Particulate emissions shall not exceed at the point of discharge, 0.1 gr/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Emissions from this natural gas-fired IC engine shall not exceed any of the following limits: 5 ppmvd NO_x @ 15% O₂ (equivalent to 0.07 g-NO_x/hp-hr), 70 ppmvd CO @ 15% O₂ (equivalent to 0.6 g-CO/hp-hr), or 30 ppmvd VOC @ 15% O₂ (equivalent to 0.15 g-VOC/hp-hr). [District NSR Rule and District Rules 4701 and 4702, 5.1] Federally Enforceable Through Title V Permit
4. Emissions from this natural gas-fired IC engine shall not exceed either of the following limits: 0.0094 g-SO_x/hp-hr or 0.02 g-PM₁₀/hp-hr. Compliance with these limits shall be shown by using natural gas with a sulfur content less than or equal to 1.0 gr S/100 scf. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Natural gas sulfur content shall not exceed 1.0 gr S/100 scf. [District NSR Rule and District Rule 4801] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ 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 engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702, 5.6.1.1, 5.6.9, 6.5.2, 6.5.7] Federally Enforceable Through Title V Permit
7. If either the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, 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 the performing the notification and testing required by this condition. [District Rules 4701 and 4702, 6.5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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8. 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 4701 and 4702, 5.6.9, 6.5.7] Federally Enforceable Through Title V Permit
9. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 15% O₂, (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 4701 and 4702, 6.5.8] Federally Enforceable Through Title V Permit
10. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 5.6.7, 6.5.6] Federally Enforceable Through Title V Permit
11. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit
12. Source testing to measure natural gas-combustion NO_x, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rules 4701 and 4702, 6.3.2] Federally Enforceable Through Title V Permit
13. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701 and 4702, 6.3.3] Federally Enforceable Through Title V Permit
14. 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. VOC emissions shall be reported as methane. VOC, NO_x, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701 and 4702, 6.3.3] Federally Enforceable Through Title V Permit
15. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 4701, and 4702, 6.4] Federally Enforceable Through Title V Permit
16. 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
17. If the engine is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the fuel being fired in the IC engine shall be determined using ASTM method D 2784, D 1072, D 3246, D 4084, D 6228, or grab sample analysis by double GC for H₂S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested each quarter, but only if the engine is operated in that calendar quarter. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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20. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 4701 and 4702, 6.2.1] Federally Enforceable Through Title V Permit
21. 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 2520, 9.4.2, 4701, and 4702, 6.2.2] Federally Enforceable Through Title V Permit

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ATTACHMENT C

District Rule 4682 Stringency Analysis

Comparison of the latest amended version (amended September 20, 2007) of District Rule 4682 and the current SIP version (amended June 16, 1994)

Requirement Category	SIP Version of Rule 4682 (6/16/94)	Non-SIP Version of Rule 4682 (9/20/07)	Conclusion
Applicability	Section 2.0 - any polystyrene foam, polyethylene, and polypropylene manufacturing and processing operations.	Section 2.0 - any manufacturing, processing, and storage of products composed of polystyrene, polyethylene, or polypropylene	The non-SIP version of Rule 4682 (9/20/07) is more stringent than the SIP version (6/16/94) since it is applicable to product storage, in addition to manufacturing and processing.
Exemptions	Section 4.0 - The provisions of Sections 5.1 and 5.2 shall not apply to manufacturing and processing operations using polymeric materials containing less than 1 percent volatile organic compounds by weight, and not using a blowing agent in their process.	Section 4.0 - The provisions of Sections 5.1, 5.2, and 5.3 shall not apply to manufacturing and processing operations using polymeric materials containing less than 1 percent volatile organic compounds by weight, and not using a blowing agent in their process.	The non-SIP version of Rule 4682 (9/20/07) is as stringent as the SIP version (6/16/94), since the section by section emission limits/VOC control requirements are identical.
Emissions Limit/VOC Control – until September 20, 2010	Section 5.1.1 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.1.2 - use of collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95 percent by weight; OR 5.1.3 - VOC emissions controlled by a method which achieves an emission reduction equivalent to Section 5.1.2 and which does not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12).	Section 5.1.1 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.1.2 - use of collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95 percent by weight; OR 5.1.3 - VOC emissions controlled by a method which achieves an emission reduction equivalent to Section 5.1.2 and which does not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12).	The non-SIP version of Rule 4682 (9/20/07) is as stringent as the SIP version (6/16/94), since the section by section emission limits/VOC control requirements are identical.

Requirement Category	SIP Version of Rule 4682 (6/16/94)	Non-SIP Version of Rule 4682 (9/20/07)	Conclusion
<p>Emissions Limit/VOC Control – after September 20, 2010</p>	<p>Section 5.1.1 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.1.2 - use of collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95 percent by weight;</p> <p>OR 5.1.3 - VOC emissions controlled by a method which achieves an emission reduction equivalent to Section 5.1.2 and which does not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12)</p>	<p>Section 5.3.2 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.3.3 – use of an approved emission control system (with an emission capture system that collects at least 90 percent by weight of the emissions; and a control device that reduces emissions from the emission capture system by at least 95 percent, by weight.); manufacturing emissions vented to the approved emission control system; and emissions from the final manufactured product vented to the approved emission control system for at least 48 hours (if more than 800,000 pounds per calendar year of raw material is processed) or 24 hours (for all other operations); OR 5.3.4 - manufacturing emissions are no greater than the facility emissions which would occur under Section 5.3.3, and operations do not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12). OR 5.3.1 - total product emissions do not exceed 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly period. The total product emissions include emissions from the manufacturing operation, after controls, plus the residual blowing agent in the finished product.</p>	<p>When corresponding requirements are compared (sections 5.1.1 through 5.1.3 for the SIP version of the rule vs. sections 5.3.2 through 5.3.4 for the non-SIP version), the non-SIP version is more stringent because it includes a new requirement for the venting of emissions from the finished product into the control system, and also a requirement that the control system must be approved by the APCO.</p> <p>The new compliance option added to the non-SIP version of the rule, in section 5.3.1, is less stringent than the existing compliance options. Assuming a typical raw material with 6% VOC, the new option represents an overall emission reduction of 60%; whereas the requirements in the SIP version of the rule would require at least 85% overall control (90% capture and 95% control).</p>
<p>Blowing agent storage</p>	<p>Section 5-2 - no person shall place, hold or store any VOC blowing agent in any stationary tank, reservoir or container having a capacity greater than 200 gallons unless the container is a pressure vessel is equipped with an emission control device or system with a vapor recovery/control efficiency of at least 95 percent by weight.</p>	<p>Section 5-2 - no person shall place, hold or store any VOC blowing agent in any stationary tank, reservoir or container having a capacity greater than 200 gallons unless the container is a pressure vessel is equipped with an emission control device or system with a vapor recovery/control efficiency of at least 95 percent by weight.</p>	<p>The non-SIP version of Rule 4682 (9/20/07) is as stringent as the SIP version (6/16/94), since the section by section emission limits/VOC control requirements are identical.</p>

Requirement Category	SIP Version of Rule 4682 (6/16/94)	Non-SIP Version of Rule 4682 (9/20/07)	Conclusion
Recordkeeping	<p>Section 6.1.1 - maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used; records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. Such records shall be retained for two years, and be made available upon request.</p> <p>6.1.2 – if using an emissions control system, maintain daily records of key system operating and maintenance procedures which will demonstrate continuous operation and compliance of the emission control device; key system operating parameters are those necessary to ensure compliance with VOC emission requirements such as temperature, pressures, and flowrates. Such records shall be retained for two years, and be made available upon request.</p>	<p>Section 6.1.1 - maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used; records shall be maintained with a minimum monthly totals, with the ability to calculate daily averages in any given month.</p> <p>6.1.2 – if using an emissions control system, maintain daily records of key system operating and maintenance procedures which will demonstrate continuous operation and compliance of the emission control device; Key system operating parameters are those necessary to ensure compliance with VOC emission requirements such as temperature, pressures, and flowrates.</p> <p>6.1.4 - the operator shall keep in the facility all records required to demonstrate compliance with the requirements of this rule for a minimum of five years; records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA; records shall be submitted to the APCO, ARB, or EPA upon request.</p> <p>6.1.3 - Operators complying with Section 5.3.1 shall maintain records necessary to show compliance with that section and shall, once every month, calculate the daily average VOC emissions, based on the records for the preceding monthly period, according to the approved VOC emission calculation formula.</p>	<p>The non-SIP version of Rule 4682 (9/20/07) is more stringent than the SIP version of the rule because it requires records to be retained for a longer period, and provides more specifics regarding the manner in which records must be made available and the agencies to which such records must be made available.</p>

Requirement Category	SIP Version of Rule 4682 (6/16/94)	Non-SIP Version of Rule 4682 (9/20/07)	Conclusion
Test Methods	<p>6.2.1 - The control efficiency of any air pollution control equipment shall be determined using EPA Methods 25 and 25A for measuring total gaseous organic concentrations at the inlet and outlet of the control device.</p> <p>6.2.2 - EPA Method 18 or ARB Test Method 422 for determination of exempt compounds and halogenated blowing agents.</p>	<p>6.2.1 - The control efficiency of the emission control system shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates, and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device.</p> <p>6.2.2 - The capture efficiency of an emission capture control system shall be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable.</p> <p>6.2.3 - EPA Method 18 or ARB Test Method 422 for determination of exempt compounds and halogenated blowing agents.</p> <p>6.2.4 - The VOC blowing agent contained in polymeric materials shall be determined using South Coast Air Quality Management District (SCAQMD) Method 306 (Analysis of Pentanes in Expandable Styrene Polymers) or Bay Area Air Quality Management District (BAAQMD) Method 45 (Determination of Butanes and Pentanes in Polymeric Materials).</p>	<p>The non-SIP version of Rule 4682 (9/20/07) is more stringent than the SIP version of the rule since it specifies test methods for three more parameters (flow rates, capture efficiency, and VOC blowing agent contained in polymeric materials) than the SIP version of the rule, which specifies test methods for only two parameters (control efficiency of the control equipment, and exempt compounds).</p>

ATTACHMENT D

Detailed Facility List

Detailed Facility Report
For Facility=1075 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

STYROTEK INC ROAD 176 & AVENUE 4 DELANO, CA	FAC # STATUS: TELEPHONE:	S 1075 A 6617254957	TYPE: TOXIC ID:	TitleV 50243	EXPIRE ON: AREA: INSP. DATE:	06/30/2009 21 / 02/11
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-1075-3-10	16.33 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	16.33 MMBTULHR 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
S-1075-5-3	75 bhp IC engine	3020-10 A	1	80.00	80.00	A	75 BHP DETROIT-DIESEL MODEL #1044710 EMERGENCY IC ENGINE POWERING A FIREWATER PUMP
S-1075-6-23	3.0 MMBtu/hr	3020-02 F	1	607.00	607.00	A	EXPANDED POLYSTYRENE MOLDING OPERATION, INCLUDING PRE-EXPANDER AREA, PRODUCTION AREA, AND 3.0 MM BTU/HR NATURAL GAS/LPG FIRED REGENERATIVE THERMAL OXIDIZER (RTO) SERVING PENTANE VAPOR CONTROL SYSTEM
S-1075-7-5	28.6 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	28.6 MMBTU/HR CLEAVER-BROOKS MODEL CB-700 SYSTEM 20 NATURAL GAS/PROPANE-FIRED BOILER WITH A CLEAVER-BROOKS MODEL NTI-15-700 ULTRA LOW NOX BURNER, FGR, AND O2 TRIM SYSTEM
S-1075-8-3	375 BHP IC Engine	3020-10 C	1	240.00	240.00	A	375 BHP MAN MODEL E2842 E302/E312 NATURAL GAS-FIRED RICH-BURN IC ENGINE WITH NSCR AND PCV POWERING AN AIR COMPRESSOR

Number of Facilities Reported: 1