Bay Area Air Quality Management District

939 Ellis Street San Francisco, CA 94109 (415) 771-6000

Final

MAJOR FACILITY REVIEW PERMIT

Issued To: Wincup Facility # A1317

Facility Address:

195 Tamal Vista Boulevard Corte Madera, CA 94925

Mailing Address: 195 Tamal Vista Boulevard Corte Madera, CA 94925

Responsible Official Mark Musha, Plant Manager (415) 886-6007

Facility Contact Dave Bartleman, Maintenance (415) 886-6008

Type of Facility:ManufacturingPrimary SIC:3086Product:Foam Cups

BAAQMD Permit Division Contact: Craig Ullery

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

<u>Signed by Jack P. Broadbent</u> Jack P. Broadbent, Executive Officer/Air Pollution Control Officer <u>5/15/06</u> Date

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A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions

(as amended by the District Board on 5/2/01);

SIP Regulation 1 - General Provisions and Definitions (as approved by EPA through 6/28/99); BAAQMD Regulation 2, Rule 1 - Permits, General Requirements

(as amended by the District Board on 6/15/05);

SIP Regulation 2, Rule 1 - Permits, General Requirements (as approved by EPA through 1/26/99);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review

(as amended by the District Board on 6/15/05); SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration

(as approved by EPA through 1/26/99);

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking (as amended by the District Board on 12/21/04); and

SIP Regulation 2, Rule 4 - Permits, Emissions Banking

(as approved by EPA through 1/26/99).

B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

- 1. This Major Facility Review Permit was issued on May 15, 2006, and expires on October 31, 2009. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than April 30, 2009 and no earlier than October 31, 2008. If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after October 31, 2009. If the permit renewal has not been issued by November 1, 2009, but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application. (Regulation 2-6-307, 404.2, 407, & 409.6; MOP Volume II, Part 3, §4.2)
- 2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
- 3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)
- 4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
- 5. The filing of a request by the facility for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or

anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

- 6. This permit does not convey any property rights of any sort, or any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
- 7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
- 8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
- 9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B Public Information, Confidentiality of Business Information. (40 CFR Part 2)
- 10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)
- 11. The responsible official shall certify all documents submitted by the facility pursuant to the major facility review permit. The certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The certifications shall be signed by a responsible official for the facility. (MOP Volume II, Part 3, §4.11)
- 12. The permit holder is responsible for compliance, and certification of compliance, with all conditions of the permit, regardless whether it acts through employees, agents, contractors, or subcontractors. (Regulation 2-6-307)

C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

D. Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

E. Records

- 1. The permit holder must provide any information, records, and reports requested or specified by the APCO. (Regulation 1-441, Regulation 2-6-409.4)
- 2. Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of

entry. (Regulation 2-6-501, MOP Volume II, Part 3, §4.7)

F. Monitoring Reports

Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. Reports shall be submitted for the following periods: May 1st through October 31st and November 1st through April 30th, and are due on the last day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent to the following address:

Director of Compliance and Enforcement Bay Area Air Quality Management District 939 Ellis Street San Francisco, CA 94109 Attn: Title V Reports

(Regulation 2-6-502, MOP Volume II, Part 3, §4.7)

G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be November 1st to October 31st. The certification shall be submitted by November 30th of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division USEPA, Region IX 75 Hawthorne Street San Francisco, CA 94105 Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

H. Emergency Provisions

1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations,

by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)

- 2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. (MOP Volume II, Part 3, §4.8)
- 3. The granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement. (MOP Volume II, Part 3, §4.8)

I. Severability

1. In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

J. Miscellaneous Conditions

1. The maximum capacity for each source as shown in Table II-A is the maximum allowable capacity. Exceedance of the maximum allowable capacity for any source is a violation of Regulation 2, Rule 1, Section 301. (Regulation 2-1-301)

II. EQUIPMENT

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
S-1	Boiler (natural gas)	Johnston 3-Pass	534	23 MM Btu/hr
S-2	Boiler (natural gas)	Johnston 4-Pass	530	19 MM Btu/hr
S-4	Foam Cup Molding Lines 1-10	Cup Molding Machines	80-HK	0.42 tph
S-5	Foam Cup Molding Lines 11-16	Cup Molding Machines	48-HK	0.36 tph
S-6	Foam Cup Molding Lines 17-25	Cup Molding Machines	30-HK	0.21 tph
S-7	Foam Cup Molding Lines 27-30	Cup Molding Machines	26-HK	0.21 tph
S-10	Thermoforming Sheet Lines 1-6	American Western	1400	0.27 tph
S-11	Pre-Expander	Artisan/Rodman		0.3 tph
S-12	Pre-Expander	Artisan/Rodman		0.3 tph
S-13	Pre-Expander	Artisan/Rodman		0.3 tph
S-14	Pre-Expander	Artisan/Rodman		0.3 tph
S-15	Pre-Expander	Artisan/Rodman		0.3 tph
S-17	Cold Cleaner	Graymills/Tempest		300 gal/yr
S-27	Silo H	Handi-Kup	Storage Bin	192 ft ³
S-28	Silo I	Handi-Kup	Storage Bin	192 ft ³
S-29	Silo A	Handi-Kup	Storage Bin	192 ft ³
S-30	Silo B	Handi-Kup	Storage Bin	192 ft ³
S-31	Silo C	Handi-Kup	Storage Bin	192 ft ³
S-32	Silo D	Handi-Kup	Storage Bin	192 ft ³
S-35	Silo J	Handi-Kup	Storage Bin	189 ft ³
S-36	Silo K	Handi-Kup	Storage Bin	189 ft ³
S-37	Silo L	Handi-Kup	Storage Bin	189 ft ³
S-38	16 Dry Offset Press	HK C. UV Printer		150 Cups/Min
S-41	Cold Solvent Cleaner	McMaster-Carr		300 gal/yr

II. EQUIPMENT

		Source(s)	Applicable	Operating	Limit or
A-#	Description	Controlled	Requirement	Parameters	Efficiency
S-1	3-Pass, Steam Boiler, 600 HP	S-11, S-12,	Regulation 8,	1750 degrees F	98% by
		S-13, S-14,	Rule 52,	23 MM Btu/hr	weight,
		S-15, S-27	Section 301.1		POC
		through S-			destruction
		32; S-35			
		through S-			
		37			
S-1	3-Pass, Steam Boiler, 600 HP	S-11, S-12,	BAAQMD		< 2.8 lb/100
	(after 6/1/2000, not federally	S-13, S-14,	Regulation 8,		lb raw
	enforceable)	S-15, S-27	Rule 52,		material
		through S-	Section 301.1		processed
		32; S-35			
		through S-			
		37			
S-1	3-Pass, Steam Boiler, 600 HP	S-11, S-12,	BAAQMD		98%
	(after 6/1/2000, not federally	S-13, S-14,	Regulation 8,		
	enforceable)	S-15, S-27	Rule 52,		
		through S-	Section 304		
		32; S-35			
		through S-			
		37			
S-2	4-Pass, Steam Boiler, 500 HP	S-11, S-12,	Regulation 8,	1750 degrees F	98% by
		S-13, S-14,	Rule 52,	19 MM Btu/hr	weight,
		S-15, S-27	Section 301.1		POC
		through S-			destruction
		32; S-35			
		through S-			
		37			
S-2	4-Pass, Steam Boiler, 500 HP	S-11, S-12,	BAAQMD		< 2.8 lb/100
	(after 6/1/2000, not federally	S-13, S-14,	Regulation 8,		lb raw
	enforceable)	S-15, S-27	Rule 52,		material
		through S-	Section 301.1		processed
		32; S-35			
		through S-			
		37			

Table II B - Abatement Devices

II. EQUIPMENT

A-#	Description	Source(s) Controlled	Applicable	Operating Parameters	Limit or
A-#	Description	Controlled	Requirement	Farameters	Efficiency
S-2	4-Pass, Steam Boiler, 500 HP	S-11, S-12,	BAAQMD		98% by
	(after 6/1/2000, not federally	S-13, S-14,	Regulation 8,		weight,
	enforceable)	S-15, S-27	Rule 52,		POC
		through S-	Section 304		destruction
		32; S-35			
		through S-			
		37			

Table II B - Abatement Devices

III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirements and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit. This section also contains provisions that may apply to temporary permits.

The dates in parentheses in the Title column identify the versions of the regulations being cited and are, as applicable:

- 1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors.
- 2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full language of the SIP requirements are available on the EPA Region 9 website. The address is:

http://yosemite1.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California &cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions.

NOTE:

There are differences between the current BAAQMD rule and the version of the rule in the SIP. All sources must comply with both versions of the rule until US EPA has reviewed and approved the District's revision of the regulation.

		Federally
Applicable	Regulation Title or	Enforceable
Requirement	Description of Requirement	(Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (5/2/01)	Ν
SIP Regulation 1	General Provisions and Definitions (6/28/99)	Y
BAAQMD Regulation 2, Rule 1	General Requirements (12/21/04)	Ν
BAAQMD Regulation 2-1-429	Federal Emissions Statement (6/7/95)	Y
SIP Regulation 2, Rule 1	General Requirements (1/26/99)	Y
SIP Regulation 5	Open Burning (3/6/02)	Ν
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	Ν
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y

Table IIIGenerally Applicable Requirements

III. GENERALLY APPLICABLE REQUIRMENTS

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 5	Open Burning (3/6/02)	Y
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	Y
BAAQMD Regulation 7	Odorous Substances (3/17/82)	Ν
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (6/15/94)	Y
BAAQMD Regulation 8, Rule3	Organic Compounds – Architectural Coatings (11/21/01)	Y
BAAQMD Regulation 8, Rule 40	Organic Compounds - Aeration of Contaminated Soil and Removal of Underground Storage Tanks (12/15/99)	Y
BAAQMD Regulation 8, Rule 47	Organic Compounds - Air Stripping and Soil Vapor Extraction Operations (6/15/94)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	Ν
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (7/17/02)	N
SIP Regulation 8, Rule 51	Organic Compounds – Adhesive and Sealant Products (2/26/02)	Y
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants-Sulfur Dioxide(3/15/95)	Ν
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (10/7/98)	Ν
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (9/2/81)	Y
California Health and Safety Code Section 41750 et seq.	Portable Equipment	Ν
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (9/2/81)	Y
California Health and Safety Code Section 44300 et seq.	Air Toxics "Hot Spot" Information and Assessment Act of 1987	Ν
40 CFR Part 61, Subpart M	National Emission Standards Hazardous Air Pollutants, Asbestos	Y

Table IIIGenerally Applicable Requirements

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parentheses in the Title column identify the versions of the regulations being cited and are, as applicable:

- BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors
- 2. Any federal requirement, including a version of a District regulation that has been approved into the SIP:

The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full language of the SIP requirements are available on the EPA Region 9 website. The address is:

http://yosemite1.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California& cat=Bay+Area+Qulaity+Management+District-Agency-Wide+Provisions.

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/2/01)		
1-523	Parametric Monitoring and Recordkeeping Procedures	N	
1-523.1	Parametric monitor periods of inoperation	Y	
1-523.2	Limits on periods of inoperation	Y	
1-523.3	Reports of Violations	N	
1-523.4	Records	Y	
1-523.5	Maintenance and calibration	N	
SIP Regulation 1	General Provisions and Definitions (6/28/99)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
1-523.3	Reports of Violations	Y	
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		

Table IV-AS-1 Boiler and S-2 Boiler

Table IV-AS-1 Boiler and S-2 Boiler

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particulates	Y	
6-310	Particulate Weight Limitation	Y	
6-310.3	Particulate Weight Limitation, Heat Transfer Operation	Y	
BAAQMD	Polystyrene, Polypropylene, and Polyethylene Foam Product		
Regulation 8, Rule 52	Manufacturing Operations (7/7/99)		
8-52-301	Polystyrene Foam Product Manufacturing Operations	N	
8-52-301.1	Polystyrene Cup Molding Standard	N	
8-52-304	Approved Emission Control System	N	
8-52-401	Compliance Schedule	N	
8-52-401.1	Application for Authority to Construct/Permit to Operate	N	
8-52-401.2	Compliance Date	N	
8-52-501	Records	N	
8-52-503	Approved Emission Control System, Recordkeeping Requirements	N	
8-52-505	Burden of Proof	N	
BAAQMD	Inorganic Gaseous Pollutants, Sulfur Dioxide (3/15/95)		
Regulation			
9, Rule 1			
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-302	General Emission limitations	Y	
BAAQMD Regulation 9, Rule 7	Inorganic Gaseous Pollutants - Nitrogen Oxides and Carbon Monoxide from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (9/15/93)		
9-7-301	Emission Limits-Gaseous Fuel	Y	
9-7-301.1	Emission Limits-NOx	Y	
9-7-301.2	Emission Limits-CO	Y	
9-7-503	Records	Y	
9-7-503.2	Records of natural gas curtailment	Y	
9-7-503.3	Records of equipment testing	Y	
9-7-503.4	Source test records	Y	
BAAQMD Condition #2055	Permit Conditions		
Part 1	Abatement Requirement [Regulation 8, Rule 52]	Y	

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 2	Minimum destruction efficiency [Regulation 8, Rule 52]	Y	
Part 3	Operating temperature of S-1 and S-2 shall be at least 1750 degree F at all times. [Regulation 2-1-403]	Y	
Part 4	Operating temperature of S-1 and S-2 shall be recorded on a continuous temperature chart recorder. [Recordkeeping]	Y	

Table IV-AS-1 Boiler and S-2 Boiler

Table IV-B S-4, 5, 6, and 7 Foam Cup Molding Lines and S-10 Thermoforming

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 52	Polystyrene, Polypropylene, and Polyethylene Foam Product Manufacturing Operations (7/7/99)		
8-52-301	Polystyrene Foam Product Manufacturing Operations	Ν	
8-52-301.1	Polystyrene Cup Molding Standard	N	
8-52-304	Approved Emission Control System	N	
8-52-401	Compliance Schedule	Ν	
8-52-401.1	Application for Authority to Construct/Permit to Operate	Ν	
8-52-401.2	Compliance Date	Ν	
8-52-501	Records	Ν	
8-52-503	Approved Emission Control System, Recordkeeping Requirements	Ν	
8-52-505	Burden of Proof	Ν	

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation	Polystyrene, Polypropylene, and Polyethylene Foam Product Manufacturing Operations (7/7/99)		
8, Rule 52			
8-52-301	Polystyrene Foam Product Manufacturing Operations	Ν	
8-52-301.1	Polystyrene Cup Molding Standard	N	
8-52-304	Approved Emission Control System	N	
8-52-401	Compliance Schedule	N	
8-52-401.1	Application for Authority to Construct/Permit to Operate	N	
8-52-401.2	Compliance Date	N	
8-52-501	Records	N	
8-52-503	Approved Emission Control System, Recordkeeping Requirements	N	
8-52-505	Burden of Proof	N	
BAAQMD Condition #2055	Permit Conditions		
Part 1	Abatement Requirement [Regulation 8, Rule 52]	Y	
Part 2	Minimum destruction efficiency [Regulation 8, Rule 52]	Y	
Part 3	Operating temperature of S-1 and S-2 shall be at least 1750 degree F at all times. [Regulation 2-1-403]	Y	
Part 4	Operating temperature of S-1 and S-2 shall be recorded on a continuous temperature chart recorder. [Recordkeeping]	Y	

Table IV-DS-11 through 15 Pre-Expanders

Table IV-ES-17 Solvent Cleaning

Applicable	Regulation Title or	Federally Enforceable	Future Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD			
Regulation 8,	Organic Compounds - Solvent Cleaning Operations (9/16/98)		
Rule 16			
8-16-303	Cold Cleaner Requirements	Y	
8-16-304	Trichloroethylene Limitation	Y	
8-16-501	Solvent Records	Y	

Applicable	Regulation Title or	Federally Enforceable	Future Effective
Requirement	Description of Requirement	(Y/N)	Date
8-16-501.1	Trichloroethylene	Y	
8-16-501.2	All Other Solvents	Y	
SIP		Y	
Regulation 8,	Organic Compounds - Solvent Cleaning Operations (8/2/89)		
Rule 16			
8-16-303	Cold Cleaner Requirements	Y	
BAAQMD	Permit Conditions	Y	
Condition No.			
12205			
Part 1	Net solvent usage not to exceed 300 gallons in any consecutive 12 month period. [Cumulative Increase]	Y	
Part 2	Recordkeeping [Cumulative Increase]	Y	

Table IV-ES-17 Solvent Cleaning

Ameliachia	Develotion Title on	Federally	Future Effective	
Applicable Bogwingmont	Regulation Title or Description of Requirement	Enforceable (Y/N)		
Requirement	Description of Requirement	(¥/N)	Date	
BAAQMD				
Regulation 8,	Organic Compounds - Solvent Cleaning Operations (9/16/98)			
Rule 16				
8-16-303	Cold Cleaner Requirements	Y		
8-16-304	National Emission Standards for Hazardous Air Pollutants	Y		
	(NESHAP): Halogenated Solvent Cleaner Requirement			
8-16-305	Compliance Statement Requirement	Y		
8-16-501	Solvent Records	Y		
8-16-501.2	Facility-wide, monthly basis, type and total amount of make-up	Y		
	solvent used in all solvent cleaning operations subject to this rule			
8-16-501.4	Monthly records of make-up solvent on a per source basis	Y		
8-16-501.5	Records retained and made readily available for inspection by the	Y		
	APCO for the previous 24-month period			
8-16-501.6	Information, such as purchase orders or hazardous waste manifests	Y		
	that will allow the APCO to verify compliance with the solvent			
	loss limitation in Section 8-16-121.			
SIP		Y		
Regulation 8,	Organic Compounds - Solvent Cleaning Operations (8/2/89)			
Rule 16				
8-16-303	Cold Cleaner Requirements	Y		
BAAQMD	Permit Conditions	Y		
Condition No.				
12205				
Part 1	Net solvent usage not to exceed 300 gallons in any consecutive 12	Y		
	month period. [Cumulative Increase]			
Part 2	Recordkeeping [Cumulative Increase]	Y		

Table IV-FS-17 Solvent Cleaning

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD			
Regulation 8,	Organic Compounds – Polystyrene, Polypropylene and		
Rule 52	Polyethylene Product Manufacturing Operations (7/7/99)		
8-52-301.1	Polystyrene Foam Product Manufacturing Operations	Ν	
BAAQMD			
Condition No.			
19810			
Part 1	Throughput of EPS Pre-Puff Material not to exceed 1.5 million lbs.	Y	
	in S-27, S-28, S-35, S-36, and S-37 in any consecutive 12 month		
	period. Throughput of EPS Pre-Puff Material not to exceed 2.2		
	million lbs. in S-29, S-30, S-31, and S-32 in any consecutive 12		
	month period. [Cumulative Increase]		
Part 2	Throughput of EPS Pre-Puff Material not to exceed 4,261 lbs. in	Y	
	S-27, S-28, S-35, S-36, and S-37 in any consecutive 24 hour		
	period. Throughput of EPS Pre-Puff Material not to exceed 6,250		
	lbs. in S-29, S-30, S-31, and S-32 in any consecutive 24 hour		
	period. [Cumulative Increase]		
Part 3	Throughput of EPS Pre-Puff Material not to exceed 46,306 lbs. in	Y	
	S-27 through S-32 and S-35 through S-37 in any consecutive 24		
	hour period. [Cumulative Increase]		
Part 4	Emissions from S-27 through S-32 and S-35 through S-37 shall be	Y	
	abated at all times by S-1 and S-2 Boilers. [Cumulative Increase]		
Part 5	Recordkeeping [Cumulative Increase]	Y	

Table IV-GS-27 through 32 and 35 through 37 Storage Bin Silos

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8 Rule 4	General Solvent and Surface Coating Operations (5/16/96 10/16/04)	Y	Date
8-4-302	Solvents and Surface Coating Requirements	Y	
8-4-302.3	VOC content of coating is less than 3.5 lb/gal	Y	
8-4-312	Solvent Evaporation Loss Minimization	Y	
8-4-501	Recordkeeping Requirements	Y	
BAAQMD Condition No. 21500		Y	
Part 1	Ink throughput not to exceed 666.67 gal. in any consecutive 12 month period at each source. [Cumulative Increase]	Y	
Part 2	Solvent throughput not to exceed 248.33 gal. in any consecutive 12 month period at each source. [Cumulative Increase]	Y	
Part 3	POC emissions not to exceed 2.65 tpy from ink and solvent usage combined in any consecutive 12 month period. [Cumulative Increase]	Y	
Part 4	VOC content of the ink not to exceed 0.5% by weight. [Cumulative Increase]	Y	
Part 5	VOC content of the solvent not to exceed 7 lb/gal. [Cumulative Increase]	Y	
Part 6	Written authorization required from the District prior to using any clean-up solvent other than "Evap-A". [Cumulative Increase]	Y	
Part 7	Recordkeeping [Cumulative Increase]	Y	

Table IV-HS-38, 39, and 40 U.V. Printers

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8,	Organic Compounds - Solvent Cleaning Operations (9/16/98)		
Rule 16			
8-16-303	Cold Cleaner Requirements	Y	
8-16-304	National Emission Standards for Hazardous Air Pollutants (NESHAP): Halogenated Solvent Cleaner Requirement	Y	
8-16-305	Compliance Statement Requirement	Y	
8-16-501	Solvent Records	Y	
8-16-501.2	Facility-wide, monthly basis, type and total amount of make-up solvent used in all solvent cleaning operations subject to this rule	Y	
8-16-501.4	Monthly records of make-up solvent on a per source basis	Y	
8-16-501.5	Records retained and made readily available for inspection by the APCO for the previous 24-month period	Y	
8-16-501.6	Information, such as purchase orders or hazardous waste manifests that will allow the APCO to verify compliance with the solvent loss limitation in Section 8-16-121.	Y	
BAAQMD Condition No. 21882		Y	
Part 1	Net solvent usage not to exceed 300 gallons in any consecutive 12 month period. [Cumulative Increase]	Y	
Part 2	VOC content of the solvent not to exceed 7.02 lb/gal. [Cumulative Increase]	Y	
Part 3	POC emissions not to exceed 10 lbs. per average operating day. [Cumulative Increase]	Y	
Part 4	Written authorization required from the District prior to using any clean-up solvent other than "Evap-A". [Cumulative Increase]	Y	
Part 5	Recordkeeping [Cumulative Increase]	Y	

Table IV-IS-41 Solvent Cleaning

V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit on a timely basis.

VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

COND #2055: S-1 and S-2 boilers; S-11 through S-15 pre-expanders

- The owner/operator shall abate the volatile organic compound (VOC) emissions from S-11, S-12, S-13, S-14, and S-15, S-25 through S-32, S-35, S-36 and S-37 at all times by S-1 and S-2 Boilers. [Regulation 8, Rule 52]
- 2. The owner/operator shall maintain the VOC destruction efficiency of S-1 and S-2 Boilers at, or above, 98 percent by weight. [Regulation 8, Rule 52]
- 3. The owner/operator shall maintain the operating temperature of S-1 and S-2 Boilers at, or above, 1750 degrees Fahrenheit. [Regulation 2-1-403]

4. The owner/operator shall monitor and record the operating temperature of each boiler using a continuous temperature chart recorder. These temperature records shall be retained on site for a minimum of five years from the date of entry and made available to District personnel upon request. [Recordkeeping]

COND # 12205: S-17 solvent cleaning operation

- 1. The owner/operator shall not exceed 300 gallons of net solvent usage at S-17 in any consecutive twelve-month period. [Cumulative increase]
- 2. The owner/operator of S-17 shall maintain records of net solvent usage (based upon net make-up solvent added to S-17) on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District representatives upon request. [Cumulative increase]

VI. PERMIT CONDITIONS

COND # 19810: S-27 through 32 and 35 through 37 storage bin silos

Condition No. 19810, created in application no. 2292, is amended in application no. 7833 and further amended by recommendation by the District's Compliance & Enforcement Division as follows:

- 1. The owner/operator shall not allow throughput of EPS Pre Puff material to exceed 1.5 million lbs. in each source 27, 28, and sources 35 through 37 in any consecutive 12-month period. Throughput of EPS Pre Puff material shall not exceed 2.2 million lbs.in each source 29 through 32 in any consecutive 12-month period. [Basis: cumulative increase]
- 2. The owner/operator shall not allow throughput of EPS Pre Puff material to exceed 4,261 lbs. in each source 27, 28, and sources 35 through 37 in any consecutive 24-hour period. Throughput of EPS Pre Puff material shall not exceed 6,250 lbs. in each source 29 through 32 in any consecutive 24-hour period. [Basis: cumulative increase]
- 3. The owner/operator shall not allow throughput of EPS Pre Puff material to exceed 46,306 lbs. in sources 27 through 32 and sources 35 through 37 combined in any consecutive 24-hour period. [Basis: cumulative increase]
- 4. The owner/operator shall abate emissions from sources 27 through 32 and sources 35 through 37 at all times by S-1 and S-2 boilers. [Basis: cumulative increase]
- 5. The owner/operator shall maintain the following records:
 - a) records of material throughput in each source;
 - b) records of the VOC content (% wt. basis) of every type of finished foam product manufactured, as determined 24 hours after molding and employing sampling APCO-approved sampling procedures and analysis in a District approved logbook and the records shall be made readily available upon District staff request Records shall be maintained for a period of at least 5 years from the date of entry. [Basis: recordkeeping, cumulative increase]

COND # 21500: S-38, 39, and 40 U.V. Printers

Permit conditions for S-38, 39, and 40 U.V. Printers, Wincup, Plant #1317, A#8944

1. Owner/operator shall not exceed 666.67 gallons ink throughput at each source in any

VI. PERMIT CONDITIONS

consecutive 12-month period. [Basis: Cumulative increase]

- 2. Owner/operator shall not exceed 248.33 gallons solvent throughput at each source in any consecutive 12-month period. [Basis: Cumulative increase]
- 3. Owner/operator shall not exceed 2.65 tpy POC emissions from ink and clean-up solvent usage combined in any consecutive 12-month period. [Basis: Cumulative increase]
- 4. Owner/operator shall not use any ink with a volatile organic compound (VOC) content in excess of 0.5% VOC by weight. [Basis: Cumulative increase]
- 5. Owner/operator shall not use any clean-up solvent with a volatile organic compound (VOC) content in excess of 7lb/gal. [Basis: Cumulative increase]
- 6. Owner/operator shall obtain written authorization from the District prior to using any clean-up solvent other than "Evap-A". [Basis: Cumulative increase]
- 7. Owner/operator shall maintain records of ink and clean-up solvent usage on a monthly basis in a District-approved logbook and made readily available to District staff upon request.[Basis: Recordkeeping, cumulative increase]

COND # 21882: S-41 Solvent Cleaning Operation

Permit conditions for S-41 Solvent Cleaning Operation, Wincup, Plant #1317, A#9596

- 1. Owner/operator shall not exceed 300 gallons solvent throughput in any consecutive
- 12-

month period. [Basis: Cumulative increase]

- 2. Owner/operator shall not use any clean-up solvent with a volatile organic compound (VOC) content in excess of 7.02lb/gal. [Basis: Cumulative increase]
- 3. Owner/operator shall not exceed 10 lbs/average operating day POC emissions. [Basis: BACT]
- 4. Owner/operator shall obtain written authorization from the District prior to using any clean-up solvent other than "Evap-A". [Basis: Cumulative increase, Toxics]
- 5. Owner/operator shall maintain records of ink and clean-up solvent usage on a monthly basis in a District-approved logbook. Records shall be maintained on-site for a period of at least 5 years from date of entry. The logs shall be made readily available to District staff upon request. [Basis: Recordkeeping, cumulative increase]

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency column indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, using the following codes: annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

This section is only a summary of the limits and monitoring requirements. In the case of a conflict with any requirement in Sections I-VI, the preceding sections take precedence over Section VII.

Type of	Citation of Limit	FE	Future Effective	Limit	Monitoring Requirement	Monitoring Frequency	Monitoring
limit		Y/N	Date		Citation	(P/C/N)	Туре
	BAAQMD	Y		Ringelmann No.1		Ν	
Opacity	6-301			during any 3 min/hr			
FP	BAAQMD	Y		0.15 grains/dscf		Ν	
	6-310.3			@ 6% O ₂			
NOx	BAAQMD	Y		30 ppmv @3%O2,		Р	
	9-7-301.1			dry, 3-hr avg			
	BAAQMD	Y		150 ppmv @ 3%O2,		Р	
	9-7-305.1			dry, 3-hr avg			
	BAAQMD	Y		150 ppmv @ 3%O2,		Р	
	9-7-306.1			dry, 3-hr avg			
CO	BAAQMD	Y		400 ppmv @3%O2,		Р	
	9-7-301.2			dry, 3-hr avg			
	BAAQMD	Y		400 ppmv @3%O2,		Р	
	9-7-305.2			dry, 3-hr avg			
	BAAQMD	Y		400 ppmv @3%O2,		Р	
	9-7-306.2			dry, 3-hr avg			
VOC	BAAQMD	Y		Minimum operating	BAAQMD	P/C	Temperature
	Cond# 2055,			temperature	Cond# 2055,		Chart
	Part 3			= 1750 degrees F	Part 4		Recorder

Table VII-AS1 AND S2 – BOILERS

	Citation of		Future		Monitoring	Monitoring	
Type of	Limit	FE	Effective	Limit	Requirement	Frequency	Monitoring
limit		Y/N	Date		Citation	(P/C/N)	Туре
	BAAQMD	Ν	6/1/2000	<2.8 lb/100 lb raw	BAAQMD	P/M	Records
	8-52-301.1			material processed	8-52-501.1		
	BAAQMD	Ν	6/1/2000	<2.8 lb/100 lb raw	BAAQMD	P/D	Key system
	8-52-301.1			material processed	8-52-503		operating
							parameters
SO2	BAAQMD	Y		Ground Level		Ν	
	9-1-301			Concentration of 0.5		1	
				ppm for 3 min. or			
				0.25 ppm for 60 min.			
				or 0.05 ppm for 24			
				hours			
	BAAQMD	Y		Sulfur dioxide		Ν	
	9-1-302			emission not to			
				exceed 300 ppm			
				(dry)			

Table VII-A S1 AND S2 – BOILERS

Table VII-BS-4, 5, 6, and 7 Foam Cup Molding Linesand S-10 Thermoforming

Type of Limit	Citation of Limit	FE Y/ N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD	Y		Emissions of total	None	Ν	None
	8-2-301			carbon (dry basis)			
				shall not exceed 15			
				lb/day and 300 ppm			

Type of Limit	Citation of Limit	FE Y/	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD 8-52-301.1 Polystyrene Foam Product Manufactur- ing	N N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-501.1	P/M	Records
	Operations BAAQMD 8-52-301.1 Polystyrene Foam Product Manufactur- ing Operations	N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-503	P/D	Key system operating parameters

Table VII-B S-4, 5, 6, and 7 Foam Cup Molding Lines and S-10 Thermoforming

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-2-301	Y		Emissions of total carbon (dry basis)	None	Ν	None
	Miscellan- eous Operations			shall not exceed 15 lb/day and 300 ppm			
	BAAQMD Cond# 2055, Part 2	Y		Minimum operating temperature = 1750 degrees F	BAAQMD Cond# 2055, Part 4	С	Temperatur eChart Recorder
VOC	BAAQMD 8-52-301.1	N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-501.1	P/M	Records
	BAAQMD 8-52-301.1	N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-503	P/D	Key system operating parameters

Table VII-CS-11 through 15 Pre-Expanders

Table VII-DS-17 Solvent Cleaning

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD	Y		Usage less than 300	BAAQMD	P/M	records
	Cond#			gallons per year	Cond# 12205,		
	12205				Part 2		
	Part 1						

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-2-301 Miscellane ous Operations	Y		Emissions of total carbon (dry basis) shall not exceed 15 lb/day and 300 ppm	None	N	None
VOC	BAAQMD Cond# 19810, Part 1	Y		 ≤ 1.5 million lbs in any cosecutive 12 month period for S27, S-28, S35, S36 and S37 < 2.2 million lbs in any consecutive 12 month periof for S29, S30, S31 and S32 	BAAQMD Cond# 19810, Part 5	P/A	Records
VOC	BAAQMD Cond# 19810, Part2	Y		< 4261 lbs in any consecutive 24 hour period for S27, S-28, S35, S36 and S37 \leq 6250 lbs in any consecutive 24 hour period for S29, S30, S31 and S32	BAAQMD Cond# 19810, Part 5	P/D	Records
VOC	BAAQMD Cond# 19810, Part 3	Y		< 46,306 lbs in any consecutive 24-hour period	BAAQMD Cond# 19810, Part 5	P/D	Records
	BAAQMD 8-52-301.1	N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-501.1	P/M	Records
	BAAQMD 8-52-301.1	N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-503	P/D	Key system operating parameters

Table VII-ES-27 through 32 and 35 through 37 Bin Silos

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-4-302.3	Y		3.5 lb/gal	None	P/M	Records
VOC	BAAQMD Cond# 21500, Part 1	Y		≤ 666.67 gallons in consecutive 12 month period	BAAQMD Cond #21500, Part 7	P/M	Records
VOC	BAAQMD Cond# 21500, Part 2 8-4-302.3	Y		< 248.33 gallons in consecutive 12 month period	BAAQMD Cond #21500, Part 7None	P/M	Records
VOC	BAAQMD Cond# 21500, Part 3	Y		2.5 TPY from ink and solvent usage	BAAQMD Cond #21500, Part 7	P/M	Records
VOC	BAAQMD Cond# 21500, Part 4	Y		0.5 % VOC in ink , by weight	BAAQMD Cond# 21500, Part 7	P/M	Records
VOC	BAAQMD Cond # 21500, Part 5	Y		7 lb/ gal VOC for cleanup solvent	BAAQMD Cond # 21500 Part 7	P/M	Records

Table VII-FS-38, 39 and 40 U.V. Printer

Type of	Citation		Future		Monitoring	Monitoring	
Limit	of	FE	Effective	Limit	Requirement	Frequency	Monitoring
	Limit	Y/N	Date		Citation	(P/C/N)	Туре
VOC	BAAQMD	Y		Records	BAAQMD	P/M	Records
	8-16-501.5				8-16-501.5		
VOC	BAAQMD	Y		300 gal/year net	BAAQMD	P/M	Records
	Cond#			solvent usage	Cond# 21822,		
	21822,				Part 5		
	Part 1						
VOC	BAAQMD	Y		7.02 lb/ gal VOC for	BAAQMD	P/M	Records
	Cond #			cleanup solvent	Cond # 21500		
	21500,				Part 5		
	Part 2						
VOC	BAAQMD	Y		10 lbs per average	BAAQMD	P/M	Records
	Cond #			operating day	Cond # 21500		
	21500,				Part 5		
	Part 3						

Table VII-GS-41 Solvent Cleaner

VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 et. Seq. of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

Applicable		
Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
6-301		
BAAQMD	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
6-310		or EPA Reference Method 5 (40 CFR 60, Appendix A),
		Determination of Particulate Emissions from Stationary Sources
BAAQMD	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
6-310.3	for Heat Transfer Operations	or
		USEPA Method 5, Determination of Particulate Matter Emissions
		from Stationary Sources
BAAQMD	General Operations	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
6-311		or
		USEPA Method 5, Determination of Particulate Matter Emissions
		from Stationary Sources
SIP	Emissions of VOC	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic
8-2-301		Carbon Sampling;
		or EPA Method 25 or Determination of Total Gaseous
		Nonmethane Organic Emissions as Carbon, or
		EPA Method 25A, Determination of Total Gaseous Organic
		Concentration Using a Flame Ionization Analyzer
BAAQMD	Emissions of VOC	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic
8-4-302		Carbon Sampling;
		or EPA Method 25 or Determination of Total Gaseous
		Nonmethane Organic Emissions as Carbon, or
		EPA Method 25A, Determination of Total Gaseous Organic
		Concentration Using a Flame Ionization Analyzer

Table VIIITest Methods

VIII. TEST METHODS

Table VIII Test Methods

Applicable		
Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD	Polystyrene Foam Product	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic
8-52-301.1	Manufacturing Operations	Carbon Sampling;
		or EPA Method 25 or Determination of Total Gaseous
		Nonmethane Organic Emissions as Carbon, or
		EPA Method 25A, Determination of Total Gaseous Organic
		Concentration Using a Flame Ionization Analyzer
BAAQMD	General Emission Limitation	Manual of Procedures, Volume IV, ST-19A, Sulfur Dioxide,
9-1-302		Continuous Sampling, or
		ST-19B, Total Sulfur Oxides Integrated Sample
BAAQMD	Determination of Nitrogen	Manual of Procedures, Volume IV, ST-13 A or B, Oxides of
9-7-301.1	Oxides	Nitrogen, Continuous or Integrated Sampling
BAAQMD	Determination of Carbon	Manual of Procedures, Volume IV, ST-6, Carbon monoxide,
9-7-301.2	Monoxide and Stack-Gas	Continuous Sampling, and ST-14, Oxygen, Continuous Sampling
	Oxygen	

ACT

Federal Clean Air Act

AB 2588

California Assembly Bill 2588 (Air Toxic "Hot Spots" Program)

APCO

Air Pollution Control Officer

ASTM

American Society for Testing and Materials

BAAQMD Bay Area Air Quality Management District

BACT Best Available Control Technology

CAA The federal Clean Air Act

CAAQS California Ambient Air Quality Standards

CEMS

Continuous Emission Monitoring System

CEQA California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CMS

Continuous Monitoring System

CO Carbon Monoxide

СОМ

Continuous Opacity Monitor

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date. Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District Regulations.

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPS), Part 63 (HAP), and Part 72 (Permits Regulation, Acid

Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

FP

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

FR

Federal Register

GDF

Gasoline Dispensing Facility

GLC

Ground Level Concentration

Grain

1/7000 of a pound

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

Major Facility

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

N/A

Not Applicable

NAAQS

National Ambient Air Quality Standards

NESHAPS

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NOx

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

NSR

New Source Review. A federal program for preconstruction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NOx, PM10, and SO2.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Total Particulate Matter

PM10

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SCR

A "selective catalytic reduction" unit is an abatement device that reduces NOx concentrations

in the exhaust stream of a combustion device. SCRs utilize a catalyst, which operates at a specific temperature range, and injected ammonia to promote the conversion of NOx compounds to nitrogen gas.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Ambient Air Quality Standards. Mandated by Title I of the Act.

SO2

Sulfur dioxide

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

TRMP

Toxic Risk Management Plan

TSP

Total Suspended Particulate

VOC

Volatile Organic Compounds

Units of Measure:

o or means		
bhp	=	brake-horsepower
Btu	=	British Thermal Unit
g	=	grams
gr	=	grain, when referring to particulate; gram when referring to VOC
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m^2	=	square meter
min	=	minute
MM	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year