

# South Coast Air Quality Management District

## Statement of Basis

### Proposed Title V Permit Renewal

**Facility Name:** Pactiv Corp.  
**Facility ID:** 21474  
**SIC Code:** 3086  
**Equipment Location:** 15221 Canary Avenue  
La Mirada, CA 90638

**Application #(s):** 449095

**Application Submittal Date(s):** 09/27/05

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#### 1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO<sub>2</sub>, SO<sub>2</sub>, CO, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of Pactiv Corp., 15221 Canary Avenue, La Mirada, CA 90638. This facility is subject to Title V requirements because it is a major source.

## **2. Facility Description**

Pactiv Corporation La Mirada facility is a Title V facility that manufactures a variety of foam products for the consumer market, including disposable food service items.

This facility operates two polystyrene foam extrusion lines, two reclaim polystyrene extrusion lines, and associated thermoform ovens, a screen cooker, grinders, storage silos, and other supporting equipment. The VOC emissions from two reclaim polystyrene extrusion lines, two polystyrene foam extrusion lines, grinders, and a screen cooker are controlled by a Regenerative Thermal Oxidizer (RTO). The PM emissions from pneumatic conveying operations from the grinders are being controlled by the filter vents of the fluff storage silos; the PM emissions from pneumatic conveying operations are being controlled by the filter vents of the surge hoppers; the PM emissions from polystyrene extrusion operations are being controlled by six electrostatic precipitators.

## **3. Construction and Permitting History**

The facility has been in constant operation at this location since 1983 and numerous permits to construct and or permits to operate have been issued to the facility. Since the issuance of the initial Title V permit, a permit revision was subsequently issued to the facility on July 6, 2007.

## **4. Regulatory Applicability Determinations**

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS or NESHAP requirements.

## **5. Monitoring and Operational Requirements**

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic

Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

The VOC emissions from two reclaim polystyrene extrusion lines, two polystyrene foam extrusion lines, grinders, and a screen cooker are controlled by the RTO. The uncontrolled VOC emissions to the RTO is greater than the major source threshold for 10 tons per year. As a result, the RTO is subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. Permit conditions have been added to satisfy the CAM requirements. Such permit conditions were developed using the design criteria and other pertinent requirements identified in 40 CFR 64 - Compliance Assurance Monitoring and Technical Guidance Document and in the August 1998 Revised Draft CAM.

The PM10 emissions from the two polystyrene extrusion reclaim lines, two polystyrene foam extrusion lines and grinders are vented to six ESP's, two filters and the filter vents of the six fluff silos. Since the pre-control potential to emit of PM10 to each of the ESP's and filters is less than 70 tons per year, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 is not applicable to the dust control equipment.

## **6. Permit Features**

### **Permit Shield**

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each piece of equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c).

The facility applied a permit shield during their initial Title V permit application process. This permit shield (Condition M333.1) can be found in Section D and H of the proposed renewal Title V permit.

### **Streamlining Requirements**

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance.

Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

**7. Summary of Emissions and Health Risks**

**Criteria Pollutant Emissions (tons/year)  
Annual Reported Emissions for Reporting Period 2006/2007**

Pollutant	Emissions (tons/year)
NOx	0.785
CO	0.205
VOC	44.947
PM	3.367
SOx	0.107

**Toxic Air Contaminants Emissions (TAC)  
Annual Reported Emissions for Reporting Period 2006/2007**

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	150.486
Benzene	0.093
Formaldehyde	0.198
Naphthalene	0.003
PAHs	0.001

**Health Risk from Toxic Air Contaminants**

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The facility was determined to be exempt from AB2588 requirements.

**8. Compliance History**

As noted, the facility has been in constant operation since 1983. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed, no Notices to Comply issued, and no Notices of Violation issued in the last two calendar years.

**9. Compliance Certification**

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.