

# South Coast Air Quality Management District

## Statement of Basis

### Proposed Title V Permit Renewal

<b>Facility Name:</b>	<b>Dart Container Corp of California</b>
<b>Facility ID:</b>	<b>3721</b>
<b>SIC Code:</b>	<b>3086</b>
<b>Equipment Location:</b>	<b>150 S. Maple Street Corona, CA 92880-1704</b>
<b>Application #(s):</b>	<b>448877</b>
<b>Application Submittal Date(s):</b>	<b>09/21/05</b>
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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 Dart Container Corp of California, 150 S. Maple Street, Corona, CA 92880. This facility is subject to Title V requirements because it is a major source.

## **2. Facility Description**

Dart Container Corporation Corona facility is a Title V facility that manufactures a variety of consumer polystyrene products. This facility operates one expandable polystyrene (EPS) cup-molding process, one extruded polystyrene (XPS) foam process, one transparent oriented polystyrene (OPS) process and one opaque high impact polystyrene (HIPS) process. The VOC emissions from the EPS cup-molding process are being controlled by four boiler/afterburners; the VOC emissions from the XPS foam process are being controlled by a Regenerative Thermal Oxidizer (RTO); the PM emissions from plastic grinders are being controlled by two baghouses; the PM emissions from polystyrene extruders and thermoforming ovens are being controlled by eight electrostatic precipitators (ESP's).

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

The facility has been in constant operation at this location since 1972 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 September 20, 2005.

## **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 XPS foam process are being controlled by the RTO. The VOC emissions from EPS cup-molding process are being controlled by four boiler/afterburners. The uncontrolled VOC emissions to the RTO, or to each of the four boiler/afterburners are greater than the major source threshold for 10 tons per year. As a result, the RTO and the four boiler/afterburners are 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 polystyrene extrusion lines, thermoformers and grinders are vented to eight ESP's and two baghouses. Since the pre-control potential to emit PM10 to each of the ESP's and baghouses 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 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 equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

### 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 2009**

Pollutant	Emissions (tons/year)
NO <sub>x</sub>	5.412
CO	24.464
VOC	147.376
PM	2.26
SO <sub>x</sub>	0.178

**Toxic Air Contaminants Emissions (TAC)  
Annual Reported Emissions for Reporting Period 2009**

The Following TACs Were Reported	Emissions (lbs/yr)
1,3-Butadiene	0.015
Acetaldehyde	0.055
Acrolein	0.002
Ammonia	1903.798
Arsenic	< 0.001
Benzene	3.51
Cadmium	< 0.001
Chromium (VI)	< 0.001
Copper	< 0.001
Diesel engine exhaust, particulate matter	2.358
ETHYL BENZENE	0.002
Formaldehyde	7.539
HEXANE	0.002
Hydrochloric acid	0.013
Lead (inorganic)	< 0.001
Manganese	< 0.001
Mercury	< 0.001
Naphthalene	0.179
Nickel	< 0.001
PAHs, total, with components not	0.062
Selenium	< 0.001
Toluene	0.012
Xylenes	0.006

**Health Risk from Toxic Air Contaminants**

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The AQMD is tracking the status of the facility under AB2588.

## **8. Compliance History**

As noted, the facility has been in constant operation since 1972. The facility has had no citizen complaints filed in the last two years. However, in the recent two years, the applicant was issued three Notices to Comply and one Notice of Violation, which are indicated as follows:

- Notice to Comply (NC D15408) issued on 8/11/2008 requiring the operator to provide 1) VOC and material usage records, 2) boiler source test report for NO<sub>x</sub>, CO and ROG, 3) RTO source test report, 4) Gas bill, 5) QCERs.

Compliance Status: The facility provided all the required documents; and thus, it achieved compliance with the notice on 8/18/2008.

- Notice to Comply (NC D15412) issued on 9/10/2008 requiring the operator to 1) use correct mathematic calculation and apply correct fuel rate, 2) submit QCER on time, 3) submit electronic report for large source on time, 4) submit R219 electronic report quarterly, 5) apply correct factor to determine VOC emissions

Compliance Status: The facility was trained how to use the correct code; and thus, it achieved compliance with the notice on 11/6/2008.

- Notice to Comply (NC D15436) issued on 10/22/2009 requiring the operator to 1) report accurate QCERs, 2) report accurate APEP, 3) submit quarterly electronic reports for all large sources and apply correct transmission code or record type in all electronic reports.

Compliance Status: The facility was already revised the reporting procedures; and thus, it achieved compliance with the notice on 11/5/2009.

- Notice of Violation (NOV P52169) issued on 10/22/2009 for failure to submit 3<sup>rd</sup> quarter electronic reports for R219 emissions and process units emissions in compliance year 2008.

Compliance Status: The facility submitted the electronic reports for the process and R219 units; and thus, it achieved compliance with the notice on 3/30/2010.

The facility is currently operating in compliance with all applicable rules and regulations.

## **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.