



**JAN 30 2012**

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)  
Project # 1113732**

Dear Mr. Rios:

The Air Pollution Control Officer has issued Authorities to Construct (S-892-10-28, '-10-29, and '-10-30) with Certificates of Conformity to Pactiv Corporation. The project authorizes the modification of 3 extrusion lines by replacement of water quench cooling with more modern enhanced air cooling.

Enclosed are copies of the Authorities to Construct. The application and proposal were sent to US EPA Region IX on December 12, 2011. No comments were received following the District's preliminary decision on this project.

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

Sincerely,

David Warner  
Director of Permit Services

Enclosures  
rue

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**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



JAN 30 2012

Mr. Mike Perez  
Pactiv Corporation  
2024 Norris Rd  
Bekersfield, Ca 93308

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)  
Project # 1113732**

Dear Mr. Perez:

The Air Pollution Control Officer has issued Authorities to Construct (S-892-10-28, '-10-29, and '-10-30) with Certificates of Conformity to Pactiv Corporation. The project authorizes the modification of 3 extrusion lines by replacement of water quench cooling with more modern enhanced air cooling.

Enclosed are the Authorities to Construct and invoice. The application and proposal were sent to US EPA Region IX on December 12, 2011. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

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

Sincerely,

David Warner  
Director of Permit Services

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

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-892-10-28

**ISSUANCE DATE:** 01/30/2012

**LEGAL OWNER OR OPERATOR:** PACTIV CORPORATION  
**MAILING ADDRESS:** ATTN: ENVIRONMENTAL ENGINEER  
2024 NORRIS RD  
BAKERSFIELD, CA 93308-2297

**LOCATION:** 2024 NORRIS RD  
BAKERSFIELD, CA 93308-2297

**SECTION:** NE10 **TOWNSHIP:** 29S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**  
MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES:  
CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Blowing agent shall consist of isopentane, 10% or greater CO<sub>2</sub> by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
5. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services

S-892-10-28 - Jan 30 2012 10:10AM - EDGEHLR : Joint Inspection NOT Required

7. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
10. The lifetime emissions from total material input (TMI) shall not exceed 2.4 lb VOC/100 lb TMI (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
11. Total VOC emissions from polystyrene foam processing, forming and on-site storage operations shall not exceed 1,233.8 lbs/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. Total VOC blowing agent consumption for the entire facility shall not exceed 8,867.9 lb/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
14. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation:  $\text{lbs VOC emitted per ton of TMI} = (2000)[\text{BAI} - (\text{PFP} \cdot \text{BAR}) - \text{BAD} + \text{WH}] / \text{TMI}$  where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
16. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation:  $\text{LE (lb VOC/100 lb TMI)} = 100 \times [\text{BAI} - (\text{RECOLL} \cdot \text{EFF})] / \text{TMI}$  where BAI = pounds VOC blowing agent used/month, RECOLL = pounds blowing agent captured/month from reclaim operations, EFF = control efficiency of thermal oxidizer, and TMI is the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) processed/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
17. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation:  $\text{RECOLL} = (\text{SCRAPBA} - \text{RPPBA})$  where SCRAPBA = pounds of thermoformer and extruder scrap VOCs entering the reclaim operations per month from the extruders and RPPBA is the pounds/month RPP VOCs (VOCs in reclaimed polystyrene pellets) made from thermoformer and extruder scrap from the extruders. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
18. VOC content of thermoformed products and reclaimed polystyrene pellets (RPP) shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
19. RTO control efficiency shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Based on 2002 source test, RTO capture efficiency for calculational purposes shall be 100%. RTO capture efficiency shall be recalculated within 60 days of any change in equipment or process design. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. The facility shall conduct weekly visual inspections to determine whether visible emissions are present. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
22. Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
23. By the end of each calendar month, the permittee shall record the following information for the previous calendar month: pounds of all blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. The average daily VOC emissions for the month shall be calculated using this data. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
24. Operator shall maintain records of mass balance calculations to verify compliance with daily VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
25. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Operator shall maintain records of monthly calculations of lifetime emissions and shall make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Average daily amount of material input to extruders shall be calculated as follows: (actual daily hours) x ((total polystyrene foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
28. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit

## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-892-10-29

**ISSUANCE DATE:** 01/30/2012

**LEGAL OWNER OR OPERATOR:** PACTIV CORPORATION  
**MAILING ADDRESS:** ATTN: ENVIRONMENTAL ENGINEER  
2024 NORRIS RD  
BAKERSFIELD, CA 93308-2297

**LOCATION:** 2024 NORRIS RD  
BAKERSFIELD, CA 93308-2297

**SECTION:** NE10 **TOWNSHIP:** 29S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES:  
CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

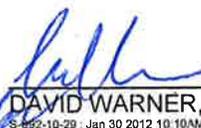
### CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Blowing agent shall consist of isopentane, 10% or greater CO<sub>2</sub> by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
5. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO



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DAVID WARNER, Director of Permit Services

S-892-10-29 : Jan 30 2012 10:10AM - EDGEHILR : Joint Inspection NOT Required

7. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
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13. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
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CONDITIONS CONTINUE ON NEXT PAGE

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## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-892-10-30

**ISSUANCE DATE:** 01/30/2012

**LEGAL OWNER OR OPERATOR:** PACTIV CORPORATION  
**MAILING ADDRESS:** ATTN: ENVIRONMENTAL ENGINEER  
2024 NORRIS RD  
BAKERSFIELD, CA 93308-2297

**LOCATION:** 2024 NORRIS RD  
BAKERSFIELD, CA 93308-2297

**SECTION:** NE10 **TOWNSHIP:** 29S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES:  
CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

### CONDITIONS

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Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services

S-892-10-30; Jan 30 2012 10:10AM - EDGEHILR Joint Inspection NOT Required

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20. Based on 2002 source test, RTO capture efficiency for calculational purposes shall be 100%. RTO capture efficiency shall be recalculated within 60 days of any change in equipment or process design. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. The facility shall conduct weekly visual inspections to determine whether visible emissions are present. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
22. Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
23. By the end of each calendar month, the permittee shall record the following information for the previous calendar month: pounds of all blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. The average daily VOC emissions for the month shall be calculated using this data. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
24. Operator shall maintain records of mass balance calculations to verify compliance with daily VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
25. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Operator shall maintain records of monthly calculations of lifetime emissions and shall make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Average daily amount of material input to extruders shall be calculated as follows: (actual daily hours) x ((total polystyrene foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
28. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit