



DEC 15 2011

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

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # S-334**  
**Project # S-1114729**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Pregis Innovative Packaging, Inc. is proposing a Title V minor permit modification to incorporate the recently issued S-334-13-5 into the Title V operating permit. This project is to replace the existing Unimaster baghouse with a Farr Model GS-8 dust collector.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-334-13-5, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,

David Warner  
Director of Permit Services

Enclosures

**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



DEC 15 2011

Gary Clowdus  
Pregis Innovative Packaging, Inc.  
8201 West Elowin Court  
Visalia, CA 93291

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-334  
Project # S-1114729**

Dear Mr. Clowdus:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-334-13-5 into the Title V operating permit. This project is to replace the existing Unimaster baghouse with a Farr Model GS-8 dust collector.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-334-13-5, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,



David Warner  
Director of Permit Services

Enclosures

**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

# TITLE V APPLICATION REVIEW

Minor Modification

Project #: S-1114729

Date: 12/12/2011

Engineer Dolores Gough

Lead Engineer Rich Karrs

*RWK*

*12-14-11*

Facility Number: S-334  
Facility Name: Pregis Innovative Packaging, Inc.  
Mailing Address: 8201 W. Elowin Ct.  
Visalia, CA 93291

Contact Name: Gary Clowdus  
Phone: 559-651-0951 ext 104

Responsible Official: Joe Minasola  
Title: Process Supervisor

---

## I. PROPOSAL

Pregis Innovative Packaging, Inc. (Pregis) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) S-334-13-5 into the Title V operating permit. ATC S-334-13-5 authorized replacement of the Unimaster baghouse with a Farr Model GS-8 dust collector.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## II. FACILITY LOCATION

Pregis is located at 8201 Elowin Court in Visalia, CA.

## III. EQUIPMENT DESCRIPTION

S-334-13-6: R-LAM LAMINATOR AND SAWING OPERATION WITH FARR MODEL GS-8 DUST COLLECTOR VENTED TO RTO LISTED ON S-334-3 AND FARR CORPORATION BAGHOUSE SHARED WITH PERMIT UNITS S-334-6 AND -7 VENTED TO RTO LISTED ON S-334-3

#### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

This change to the Title V permit is considered to be a minor modification and, as such, requires no public review.

#### **V. APPLICABLE REQUIREMENTS**

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

Pregis has proposed to replace the existing Unimaster baghouse serving the R-LAM laminator with a FARR Model GS-8 dust collector. There is no increase in emissions is expected as a result of this modification.

##### **Proposed PTO vs ATC:**

Condition #1 on the subject ATC was removed as this condition required submittal of an application to modify the Title V permit, which has already been satisfied with this permit action.

Conditions # 4 and #11 on the subject ATC were added to specify visible emission requirements and the maximum quantity of materials that can be collected by the new baghouse. They are included as Conditions #3 and #10 on the proposed PTO.

Condition #10 on the subject ATC regarding new PM10 emission rate for the new baghouse is included as Condition #9 on the proposed PTO.

Condition #17 on the subject ATC regarding recordkeeping requirements is included as Condition #16 on the proposed PTO.

##### **Proposed PTO vs current PTO:**

Conditions #3 and #10 on the proposed PTO are new (see Conditions #4 and #11 on the proposed ATC) as described above.

Condition #9 on the proposed PTO replaced Condition #8 on the existing PTO to reflect the PM10 emission rate of the new baghouse.

Condition #16 on the proposed PTO regarding recordkeeping replaced Condition #14 on the current PTO (Condition #17 on the ATC).

## VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. S-334-13-6
- B. Authorities to Construct No. S-334-13-5
- C. Permit Application and Title V Compliance Certification
- D. Previous Title V Operating Permit No. S-334-13-2

# **ATTACHMENT A**

**Proposed Modified Title V Operating Permit No.  
(S-334-13-6)**

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-334-13-6

EXPIRATION DATE: 01/31/2013

## EQUIPMENT DESCRIPTION:

R-LAM LAMINATOR AND SAWING OPERATION WITH FARR MODEL GS-8 DUST COLLECTOR VENTED TO RTO LISTED ON S-334-3 AND FARR CORPORATION BAGHOUSE SHARED WITH PERMIT UNITS S-334-6 AND '7 VENTED TO RTO LISTED ON S-334-3

## 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. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Visible emissions from each baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Baghouses shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the filter bags or cartridges. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Baghouses shall exhaust only to the regenerative thermal oxidizer listed on S-334-3. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Cleaning frequency and duration of each baghouse shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. PM10 emission rate from the FARR Model GS-8 baghouse shall not exceed 0.08 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The maximum quantity of material collected by the FARR Model GS-8 baghouse shall not exceed 750 lb/day on a monthly average. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emission rate from the Farr Corporation cartridge baghouse shall not exceed 0.05 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [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.

14. Dust collection system(s) shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Baghouses shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Differential operating pressure shall be monitored and recorded on each day that the baghouses operate. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. Monthly records of daily average of the quantity of material collected in the FARR Model GS-8 baghouse shall be maintained. Records of all maintenance of the baghouses, including all change outs of filter media, shall also be maintained, retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

DRAFT

# ATTACHMENT B

Authority to Construct No.  
(S-334-13-5)



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-334-13-5

**ISSUANCE DATE:** 04/01/2011

**LEGAL OWNER OR OPERATOR:** PREGIS INNOVATIVE PACKAGING INC

**MAILING ADDRESS:** 8201 W ELOWIN COURT  
VISALIA, CA 93291-9262

**LOCATION:** 8201 W ELOWIN COURT  
VISALIA, CA 93291-9262

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF R-LAM LAMINATOR AND SAWING OPERATION WITH UNIMASTER BAGHOUSE VENTED TO RTO LISTED ON S-334-3 AND FARR CORPORATION BAGHOUSE SHARED WITH PERMIT UNITS S-334-6 AND -7 VENTED TO RTO LISTED ON S-334-3; REPLACE UNIMASTER BAGHOUSE WITH A FARR MODEL GS-8 DUST COLLECTOR

### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] 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 baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Visible emissions from each baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Baghouses shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the filter bags or cartridges. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Baghouses shall exhaust only to the regenerative thermal oxidizer listed on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Cleaning frequency and duration of each baghouse shall be adjusted to optimize the control efficiency. [District NSR Rule] 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-334-13-5 Apr 1 2011 9:47AM - GOUJHD Joint Inspection NOT Required

8. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. PM10 emission rate from the FARR Model GS-8 baghouse shall not exceed 0.08 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The maximum quantity of material collected by the FARR Model GS-8 baghouse shall not exceed 750 lb/day on a monthly average. [District NSR Rule] Federally Enforceable Through Title V Permit
12. PM10 emission rate from the Farr Corporation cartridge baghouse shall not exceed 0.05 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Dust collection system(s) shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Baghouses shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Differential operating pressure shall be monitored and recorded on each day that the baghouses operate. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. Monthly records of daily average of the quantity of material collected in the FARR Model GS-8 baghouse shall be maintained. Records of all maintenance of the baghouses, including all change outs of filter media, shall also be maintained, retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

# ATTACHMENT C

Permit Application and Title V Compliance  
Certification

S-334-13-6

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

DEC 05 2011

## Permit Application For:

Permits Svc  
614830

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <b>Pregis Innovative Packaging</b>	
2. MAILING ADDRESS: STREET/P.O. BOX: <b>8201 W. ELOWIN CT.</b> CITY: <b>VISALIA</b> STATE: <b>CA</b> 9-DIGIT ZIP CODE: <b>93291</b>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <b>8201 W. ELOWIN CT.</b> CITY: <b>VISALIA</b> 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <b>Polyethylene Foam Manufacturing</b>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <b>S-334-13-5 . This is being submitted for the replacement of the Unimaster Bag House with a Farr Model GS-8 Dust Collector.</b>	
6. TYPE OR PRINT NAME OF APPLICANT: <b>Joe Minasola</b>	TITLE OF APPLICANT: <b>Plant Manager</b>
7. SIGNATURE OF APPLICANT: 	DATE: <b>12-1-11</b> PHONE: (559) 651-0951 x 112 FAX: (559) 651-2623 EMAIL: <a href="mailto:jminasola@pregis.com">jminasola@pregis.com</a>

### For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ <b>19.00</b>	CHECK#: <b>1106</b>
	DATE PAID: <b>12-05-11</b>	
	PROJECT NO: <b>S-1114729</b>	FACILITY ID: <b>S-334</b>

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: Pregis Innovative Packaging, Inc.	FACILITY ID: S-334
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Pregis Innovative Packaging, Inc.	
3. Agent to the Owner: n/a	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
Signature of Responsible Official

12-1-11  
Date

Joe Minasola  
Name of Responsible Official (please print)

Plant Manager  
Title of Responsible Official (please print)

# ATTACHMENT D

Previous Title V Operating Permit No.  
(S-1334-13-2)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-334-13-2

**EXPIRATION DATE:** 01/31/2013

**EQUIPMENT DESCRIPTION:**

R-LAM LAMINATOR AND SAWING OPERATION WITH UNIMASTER BAGHOUSE VENTED TO RTO LISTED ON S-334-3 AND FARR CORPORATION BAGHOUSE SHARED WITH PERMIT UNITS S-334-6 AND '7 VENTED TO RTO LISTED ON S-334-3

## 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. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Baghouses shall be equipped with an operational pressure differential gauge, mounted in an accessible location, which indicates the pressure drop across the filter bags or cartridges. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Baghouses shall exhaust only to the regenerative thermal oxidizer listed on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Cleaning frequency and duration of each baghouse shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. PM10 emission rate from Unimaster baghouse shall not exceed 0.8 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. PM10 emission rate from Farr Corporation cartridge baghouse shall not exceed 0.05 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Dust collection system(s) shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Baghouses shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Differential operating pressure shall be monitored and recorded on each day that the baghouses operate. [District Rule 2520, 9.4.2] 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.

14. Records of all maintenance of the baghouses, including all change outs of filter media, shall be maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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