



**FEB 24 2014**

Ms. Nicole Wright  
Pregis Innovative Packaging, Inc.  
8201 W. Elwin Court  
Visalia, CA 93291

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # S-334  
Project # S-1132528**

Dear Ms. Wright:

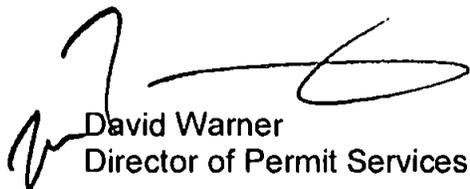
Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. You have requested to modify the existing RTS trim line by installing a new cyclone, rotary feeder, and a 75 hp Granutec grinder in series with the existing trim choppers. The cyclone, feeder, and grinder will be controlled by the existing Farr GS-8 baghouse.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

  
David Warner  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email  
Seyed Sadredin  
Executive Director/Air Pollution Control Officer

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California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

### III. Project Location

Pregis is located at 8201 Elowin Court in Visalia, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

### IV. Process Description

Pregis manufactures extruded foamed plastic sheets and planks. Their basic operations include raw material receiving and handling, extrusion, roll storage, forming, scrap reclaim, and finished goods storage.

#### Laminating and Sawing Operation (S-334-13)

This operation uses hot air to fuse individual sheets of foam into thicker sheets and includes dust pickups at the sizing saws routed to a baghouse. This operation, along with reclaim operations '6 and '7, routes collected dust and blowing agent through an existing FARR baghouse. Edge trim pick-up points from the laminating and sawing operation are routed to the FARR baghouse while kerf dust from the cross sawing operation is routed to the FARR Model GS-8 baghouse. Exhaust air from both baghouses are routed to a regenerative thermal oxidizer (RTO) listed on Permit '3. With this project, a new cyclone, rotary feeder, and 75 hp Granutec grinder will be added in series to the existing trim choppers. The proposed cyclone will also vent to the FARR baghouse (Appendix B).

### V. Equipment Listing

#### Pre-Project Equipment Description:

S-334-13-7: 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

#### Proposed Modification:

S-334-13-8: ' MODIFICATION OF 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: MODIFICATION OF THE RTS TRIM LINE OPERATION TO ADD NEW CYCLONE, ROTARY FEEDER, AND GRINDER

#### Post Project Equipment Description:

S-334-13-8: R-LAM LAMINATOR AND SAWING OPERATION EQUIPPED GRANUTEC GRINDER WITH HIGH-EFFICIENCY K-TRON CYCLONE AND 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

**VI. Emission Control Technology Evaluation**

The operation is served by two existing Farr baghouses. Both baghouses have a control efficiency of 99.99% (per applicant).

Design check calculations:

Air Flow Calculations for the baghouse dust collector:

The total cloth area for the baghouse is 2,600 ft<sup>2</sup>. This baghouse utilizes a pulse jet cleaning mechanism.

Airflow: = 5,000 ft<sup>3</sup>/min (per Manufacturer)  
Air/Cloth Ratio: = Air Flow Rate ÷ Cloth Area  
= 5,000 cfm ÷ 2,600 ft<sup>2</sup> = 1.9 ft/min

According to the Air Pollution Control Manual (1992), p. 128, Table 5, typical air/cloth ratio for shaker filters range from 2.0 – 3.5. The calculated air/cloth ratio falls close to within the range of typical values; therefore proper control efficiencies are expected. In addition, as indicated above, the baghouse has a manufacturer's guarantee of 99.99% control efficiency for PM<sub>10</sub>.

The proposed cyclone will collect large pieces of polyethylene debris from the proposed Granutec grinder.

**VII. General Calculations**

**A. Assumptions**

- Maximum operating schedule is 24 hours/day, 7 days/week and 365 days/year
- Only PM10 emissions are emitted from the subject equipment
- Control efficiency of the proposed cyclone (Model Cyclone) is 85% (per manufacturer)
- Control efficiency of the FARR baghouse (Model GS-8) is 99.99% (per manufacturer)
- Maximum quantity of material collected by the new FARR baghouse is 750 lb/day
- PM collected in baghouse is 100% PM<sub>10</sub> (for calculation purposes)

**B. Emission Factors**

**Pre-Project Emission Factor (EF1)**

Equipment	EF1 (lb/day)	Source
FARR GS-8 baghouse	0.08 lb/day	Current PTO
FARR corp. baghouse	0.05 lb/day	Current PTO

**Post-Project Emission Factor (EF2)**

Equipment	EF2 (lb/day)	Source
FARR GS-8 baghouse	0.08 lb/day	
FARR corp. baghouse	0.05 lb/day	
K-Tron Cyclone	0.4 lb/day**	Per applicant

\*\* see VII.C.2 below

**C. Calculations**

**1. Pre-Project Potential to Emit (PE1)**

FARR (GS-8) baghouse = 0.08 lb-PM<sub>10</sub>/day

FARR corp. baghouse = 0.05 lb-PM<sub>10</sub>/day

Total Daily PE1 = (0.08 + 0.05) lb-PM<sub>10</sub>/day = 0.13 lb-PM<sub>10</sub>/day

Total Annual PE1 = 0.13 lb-PM<sub>10</sub>/day x 365 days/year = 47 lb-PM<sub>10</sub>/yr

**2. Post Project Potential to Emit (PE2)**

K-Tron Cyclone

Daily PE2 = PM10 Concentration x minutes operated per day x exhaust flowrate  
 = 0.001 gr/dscf x 1440 min/day x 2,000 dscf/min x lb/7000 gr  
 = 0.4 lb-PM10/day

Total Daily = (0.08 + 0.05 + 0.4) lb-PM<sub>10</sub>/day = 0.53 lb-PM<sub>10</sub>/day

Total Annual PE2 = 0.53 lb PM<sub>10</sub>/day x 365 days/year = 193 lb-PM<sub>10</sub>/yr

**3. Pre-Project Stationary Source Potential to Emit (SSPE1)**

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

SSPE1 (lb/year)					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
S-334-1-3	0	0	0	0	0
S-334-2-7	0	0	2,327	0	0
S-334-3-13	3,894	46	590	4,740	146,840
S-334-6-9	0	0	0	0	0
S-334-7-10	0	0	0	0	0
S-334-8-3	0	0	0	0	0
S-334-10-5	0	0	2,008	0	0
S-334-11-3	0	0	0	0	0
S-334-13-7	0	0	47	0	0
S-334-14-2	0	0	584	0	0

S-334-15-3	0	0	0	0	0
S-334-16-2	0	0	2,613	0	0
S-334-17-2	0	0	1,652	0	0
S-334-18-2	0	0	0	0	250,000
S-334-19-2	0	0	1,427	0	0
SSPE1	3,894	46	11,248	4,740	396,840

#### 4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

Permit Unit	SSPE2 (lb/year)				
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
S-334-1-3	0	0	0	0	0
S-334-2-7	0	0	2,327	0	0
S-334-3-13	3,894	46	590	4,740	146,840
S-334-6-9	0	0	0	0	0
S-334-7-10	0	0	0	0	0
S-334-8-3	0	0	0	0	0
S-334-10-5	0	0	2,008	0	0
S-334-11-3	0	0	0	0	0
S-334-13-8 (ATC)	0	0	193	0	0
S-334-14-2	0	0	584	0	0
S-334-15-3	0	0	0	0	0
S-334-16-2	0	0	2,613	0	0
S-334-17-2	0	0	1,652	0	0
S-334-18-2	0	0	0	0	250,000
S-334-19-2	0	0	1,427	0	0
SSPE2	3,894	46	11,394	4,740	396,840

#### 5. Major Source Determination

##### Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

This source is an existing Major Source for VOC emissions and will remain a Major Source for VOC. No change in other pollutants are proposed or expected as a result of this project.

**Rule 2410 Major Source Determination:**

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable. Please see Appendix D for CO2e/GHG Calculations; the only source of CO2e/GHG emissions is from permit unit S-334-3-13.

PSD Major Source Determination (tons/year)							
	NO2	VOC	SO2	CO	PM	PM10	CO2e
Estimated Facility PE before Project Increase	2	198	0	2	6	6	4,444
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source ? (Y/N)	N	N	N	N	N	N	N

As shown above, the facility is an existing major source for PSD for at least one pollutant. Therefore the facility is an existing major source for PSD.

**6. Baseline Emissions (BE)**

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

PM<sub>10</sub> is the only criteria pollutant emitted on this project. As shown in Section VII.C.5 above, the facility is not a Major Source for PM<sub>10</sub>. Therefore, Baseline Emissions (BE) are equal to the Pre-Project Potential to Emit (PE1).

## 7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act." Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the SB 288 Major Modification calculation.

Therefore this project is not an SB 288 Major Modification.

Since this facility is a major source for VOC emissions, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
VOC	0	50,000	No

Since none of the SB 288 Major Modification Thresholds are surpassed with this project, this project does not constitute an SB 288 Major Modification.

## 8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Federal Major Modification determination.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

### Step 1

For existing emissions units, the increase in emissions is calculated as follows.

$$\text{Emission Increase} = \text{PAE} - \text{BAE} - \text{UBC}$$

Where: PAE = Projected Actual Emissions, and  
BAE = Baseline Actual Emissions  
UBC = Unused baseline capacity

If there is no increase in design capacity or potential to emit, the PAE is equal to the annual emission rate at which the unit is projected to emit in any one year, selected by the operator, within 5 years after the unit resumes normal operation (10 years for

existing units with an increase in design capacity or potential to emit). If detailed PAE are not provided, the PAE is equal to the PE2 for each permit unit.

The BAE is calculated based on historical emissions and operating records for any 24 month period, selected by the operator, within the previous 10 year period (5 years for electric utility steam generating units). The BAE must be adjusted to exclude any non-compliant operation emissions and emissions that are no longer allowed due to lower applicable emission limits that were in effect when this application was deemed complete.

The project's combined total emissions are compared to the Federal Major Modification Thresholds in the following table.

Federal Major Modification Thresholds for Emission Increases			
Pollutant	Total Emissions Increases (lb/yr)	Thresholds (lb/yr)	Federal Major Modification?
NO <sub>x</sub> *	0	0	No
VOC*	0	0	No
PM <sub>10</sub>	146	30,000	No
PM <sub>2.5</sub>	0	20,000	No
SO <sub>x</sub>	0	80,000	No

\*If there is any emission increases in NO<sub>x</sub> or VOC, this project is a Federal Major Modification and no further analysis is required.

Since none of the Federal Major Modification Thresholds are being surpassed with this project, this project does not constitute a Federal Major Modification and no further analysis is required.

### 9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO<sub>2</sub> (as a primary pollutant)
- SO<sub>2</sub> (as a primary pollutant)
- CO
- PM
- PM<sub>10</sub>
- Greenhouse gases (GHG): CO<sub>2</sub>, N<sub>2</sub>O, CH<sub>4</sub>, HFCs, PFCs, and SF<sub>6</sub>

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

In the case the facility is an existing PSD Major Source, the second step of the PSD evaluation is to determine if the project results in a PSD significant increase.

In the case the facility is NOT an existing PSD Major Source but is an existing source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

In the case the facility is new source, the second step of the PSD evaluation is to determine if this new facility will become a new PSD major Source as a result of the project and if so, to determine which pollutant will result in a PSD significant increase.

**I. Potential to Emit for New or Modified Emission Units vs PSD Major Source Thresholds**

As a screening tool, the project potential to emit from all new and modified units is compared to the PSD major source threshold, and if total project potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

<b>PSD Major Source Determination: Potential to Emit (tons/year)</b>							
	NO2	VOC	SO2	CO	PM	PM10	CO2e
Total PE from New and Modified Units	0	0	0	0	0.1	0.1	0
PSD Major Source threshold	250	250	250	250	250	250	100,000
New PSD Major Source?	N	N	N	N	N	N	N

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore Rule 2410 is not applicable and no further discussion is required.

**10. Quarterly Net Emissions Change (QNEC)**

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix I.

**VIII. Compliance**

**Rule 2201 New and Modified Stationary Source Review Rule**

**A. Best Available Control Technology (BACT)**

**1. BACT Applicability**

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions\*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

\*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

**a. New emissions units – PE > 2 lb/day**

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

**b. Relocation of emissions units – PE > 2 lb/day**

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

**c. Modification of emissions units – AIPE > 2 lb/day**

$$\text{AIPE} = \text{PE}_2 - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE<sub>2</sub> = Post-Project Potential to Emit, (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE}_1 \times (\text{EF}_2/\text{EF}_1)$$

Where,

PE<sub>1</sub> = The emissions unit's PE prior to modification or relocation, (lb/day)

EF<sub>2</sub> = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF<sub>2</sub> is greater than EF<sub>1</sub> then EF<sub>2</sub>/EF<sub>1</sub> shall be set to 1

EF<sub>1</sub> = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$\text{AIPE} = \text{PE}_2 - (\text{PE}_1 * (\text{EF}_2 / \text{EF}_1))$$

**PM<sub>10</sub>**

$$\begin{aligned} \text{AIPE} &= 0.53 - (0.13 * (0.53/0.13)) \\ &= 0.53 - 0.13 * 1 \\ &= 0.4 \text{ lb/day} \end{aligned}$$

As demonstrated above, the AIPE is not greater than 2.0 lb/day for PM<sub>10</sub> emissions. Therefore BACT is not triggered.

**d. SB 288/Federal Major Modification**

As discussed in Section VII.C.7 above, this project does not constitute an SB 288 and/or Federal Major Modification for NO<sub>x</sub> emissions. Therefore BACT is not triggered for any pollutant.

**B. Offsets**

**1. Offset Applicability**

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

<b>Offset Determination (lb/year)</b>					
	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>CO</b>	<b>VOC</b>
<b>SSPE2</b>	3,894	46	11,394	4,740	396,840
<b>Offset Thresholds</b>	20,000	54,750	29,200	200,000	20,000
<b>Offsets triggered?</b>	No	No	No	No	Yes

**2. Quantity of Offsets Required**

As seen above, the SSPE2 is not greater than the offset threshold for PM10 emissions. The SSPE2 is greater than the offset threshold for VOCs; however, there is no change in VOC emissions on this project. Therefore, offset calculations are not necessary and offsets will not be required for this project.

**C. Public Notification**

**1. Applicability**

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

**a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications**

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in VII.C.7, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

**b. PE > 100 lb/day**

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore public noticing is not required for this project for PE > 100 lb/day.

**c. Offset Threshold**

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO <sub>x</sub>	3,894	3,894	20,000 lb/year	No
SO <sub>x</sub>	46	46	54,750 lb/year	No
PM <sub>10</sub>	11,394	11,248	29,200 lb/year	No
CO	4,740	4,740	200,000 lb/year	No
VOC	396,840	396,840	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

**d. SSIPE > 20,000 lb/year**

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO <sub>x</sub>	3,894	3,894	0	20,000 lb/year	No
SO <sub>x</sub>	46	46	0	20,000 lb/year	No
PM <sub>10</sub>	11,227	11,248	146	20,000 lb/year	No
CO	4,740	4,740	0	20,000 lb/year	No
VOC	396,840	396,840	0	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

## **2. Public Notice Action**

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

### **D. Daily Emission Limits (DELs)**

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

#### **Proposed Rule 2201 (DEL) Conditions:**

- PM10 emission rate from the FARR Model GS-8 baghouse shall not exceed 0.08 lb/day. [District Rule 2201]
- 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]
- PM10 emission rate from the FARR Corporation cartridge baghouse shall not exceed 0.05 lb/day. [District Rule 2201]
- PM10 emission rate from the K-Tron Cyclone shall not exceed 0.4 lb/day. [District Rule 2201]

### **E. Compliance Assurance**

#### **1. Source Testing**

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

#### **2. Monitoring**

No monitoring is required to demonstrate compliance with Rule 2201.

#### **3. Recordkeeping**

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following condition(s) are listed on the permit to operate:

- 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 2201]

#### **4. Reporting**

No reporting is required to demonstrate compliance with Rule 2201.

### **Rule 2520 Federally Mandated Operating Permits**

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit pursuant to Section 3.20 of this rule. As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Pregis must apply to administratively amend their Title V permit.

### **Rule 4001 New Source Performance Standards (NSPS)**

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to baghouses.

### **Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to baghouses operations.

### **Rule 4101 Visible Emissions**

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). The following condition will be retained on the ATC to ensure continued compliance:

- 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 Rules 2520 and 4101]

### **Rule 4102 Nuisance**

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

### **California Health & Safety Code 41700 (Health Risk Assessment)**

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than or equal to one. According to the Technical Services Memo for this project (Appendix C), the total facility prioritization score including this project was less than or equal to one.

Therefore, no future analysis is required to determine the impact from this project and compliance with the District's Risk Management Policy is expected.

### Discussion of T-BACT

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 10 in a million). As outlined by the HRA Summary in Appendix C of this report, the emissions increases for this project was determined to be less than significant.

### Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits the discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

#### K-Tron Cyclone:

$$\text{PM Conc. (gr/scf)} = \frac{(\text{PM emission rate}) \times (7,000 \text{ gr/lb})}{(\text{Air flow rate}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})}$$

PM<sub>10</sub> emission rate = 0.4 lb/day. Assuming 100% of PM is PM<sub>10</sub>  
Exhaust Gas Flow = 2,000 scfm

$$\begin{aligned} \text{PM Conc. (gr/dscf)} &= [(0.4 \text{ lb/day}) \times (7,000 \text{ gr/lb})] \div [(2,000 \text{ ft}^3/\text{min}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})] \\ \text{PM Conc.} &= 0.0009 \text{ gr/dscf} \end{aligned}$$

Since 0.0009 gr/dscf is less than 0.1 gr/dscf, compliance is expected.

### Rule 4202 Particulate Matter – Emission Rate

Per section 4.1, particulate matter (PM) emissions from any source operation shall not exceed the allowable hourly emission rate (E) as calculated using the following applicable formulas:

$$E = 3.59 P^{0.62} \quad (\text{when, } P = \text{process weight rate} \leq 30 \text{ tons/hr})$$

$$E = 17.31 P^{0.16} \quad (\text{when, } P = \text{process weight rate} > 30 \text{ tons/hr})$$

Where:

E = allowable emission rate, lb/hr

P = process weight, ton/hr (0.0002 ton/hr – per applicant)

$$E = 3.59 (0.0002)^{0.62} = 0.02 \text{ lb/hr}$$

Assuming all PM<sub>10</sub> is PM, the permitted emission rate for the new baghouse of 0.0002 lb-PM<sub>10</sub>/hr is less than the allowable 0.02 lb-PM/hr. Therefore, compliance with this rule is expected.

### **California Health & Safety Code 42301.6 (School Notice)**

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

### **California Environmental Quality Act (CEQA)**

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District has determined that potential emission increases would have a less than significant health impact on sensitive receptors.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

### **IX. Recommendation**

Compliance with all applicable rules and regulations is expected. Issue ATC S-334-13-8 subject to the permit conditions on the attached draft ATC in **Appendix C**.

**X. Billing Information**

<b>Annual Permit Fees</b>			
<b>Permit Number</b>	<b>Fee Schedule</b>	<b>Fee Description</b>	<b>Annual Fee</b>
S-334-13-8	3020-01-D	1.39 eletrical hp	\$314.00

**Appendixes**

- A: Draft ATC
- B: Current PTO
- C: HRA Summary
- D: CEQA GHG: Project Specific Analysis
- E: Quarterly Net Emissions Change
- F: Emission Profile

**APPENDIX A**  
**Draft ATC**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** S-334-13-8

**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 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: MODIFICATION OF THE RTS TRIM LINE OPERATION TO ADD NEW CYCLONE, ROTARY FEEDER, AND GRINDER

**CONDITIONS**

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

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 canceled 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

**DRAFT**

DAVID WARNER, Director of Permit Services  
S-334-13-8 - Feb 19 2014 11:48AM - YOSHIMUJ : Joint Inspection NOT Required

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. PM10 emission rate from the K-Tron Cyclone shall not exceed 0.4 lb/day. [District Rule 2201]
13. Facility wide VOC emissions shall not exceed the amounts identified on S-334-3. [District Rule 2201] 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
18. {1830} 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
19. {1831} 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

DRAFT

**APPENDIX B**  
**Current PTO**

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-334-13-7

**EXPIRATION DATE:** 01/31/2018

**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

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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.

**APPENDIX C**  
**HRA Summary**

# San Joaquin Valley Air Pollution Control District Risk Management Review

To: John Yoshimura – Permit Services  
 From: Cheryl Lawler – Technical Services  
 Date: February 6, 2014  
 Facility Name: Pregis Innovate Packaging  
 Location: 8201 W. Elowin Court, Visalia  
 Application #(s): S-334-14-8  
 Project #: S-1132529

## A. RMR SUMMARY

RMR Summary			
Categories	Polyethylene Foam Cyclone, Rotary Feeder, & Grinder (Unit 14-8)	Project Totals	Facility Totals
Prioritization Score	0.00*	0.00*	0.05
Acute Hazard Index	N/A	N/A	N/A
Chronic Hazard Index	N/A	N/A	N/A
Maximum Individual Cancer Risk	N/A	N/A	N/A
T-BACT Required?	No		
Special Permit Conditions?	No		

\*A prioritization was not performed after determining no Hazardous Air Pollutants (HAPs) are associated with this project. No further analysis was required.

### I. Project Description

Technical Services received a request on February 5, 2014, to perform a Risk Management Review for a polyethylene foam manufacturing business proposing to modify an existing RTS trim line by installing a new cyclone, rotary feeder, and a 75 hp grinder in series with the existing trim choppers which will be controlled by an existing baghouse.

### II. Analysis

After reviewing the information provided in the Risk Management Review request along with sample MSDS sheets for polyethylene foam, Technical Services determined that there are no HAPs associated with this project. Therefore, no further analysis or prioritization was required for this project.

### **III. Conclusion**

The proposed project will not contribute to the facility's risk. In accordance with the District's Risk Management Policy, the project is approved **without** Toxic Best Available Control Technology (T-BACT).

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

### **Attachments**

RMR Request Form  
Sample MSDS  
Facility Summary

**APPENDIX D**  
**CEQA GHG: Project Specific Analysis**

Natural Gas
EF CO2e (metric ton/MMBtu)
0.0529

For CEQA purposes use CO2e (metric tons/yr).  
 For PSD purposes use CO2e (short tons/yr).

If no annual heat input limit:

Permit Unit	Unit Rating (MMBtu/hr)	hr/yr	EF CO2e (metric ton/MMBtu)	CO2e (metric ton/yr)	short ton conversion	CO2e (short ton/yr)
S-334-3-14	8.7	8,760	0.0529	4,032	1.10231	4,444
<b>Total:</b>				<b>4,032</b>	<b>Total:</b>	<b>4,444</b>

**Calculations:**  
 $CO2e \text{ (metric ton/yr)} = MMBtu/hr \times hr/yr \times EF \text{ metric ton/MMBtu}$   
 $CO2e \text{ (short ton/yr)} = MMBtu/hr \times hr/yr \times EF \text{ metric ton/MMBtu} \times 1.10231 \text{ short ton/metric ton}$

**APPENDIX E**  
**Quarterly Net Emissions Change (QNEC)**

## Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

$QNEC = PE2 - PE1$ , where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.

PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.

PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above, quarterly PE2 and quarterly PE1 can be calculated as follows:

$$\begin{aligned} PE2_{\text{quarterly}} &= PE2_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 193 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 48.25 \text{ lb PM}_{10}\text{/qtr} \end{aligned}$$

$$\begin{aligned} PE1_{\text{quarterly}} &= PE1_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 47 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 6.5 \text{ lb PM}_{10}\text{/qtr} \end{aligned}$$

Quarterly NEC [QNEC]			
	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	48.25	11.75	36.5
CO	0	0	0
VOC	0	0	0

**APPENDIX F**  
**Emission Profile**

Permit #: S-334-13-8	Last Updated
Facility: PREGIS INNOVATIVE PACKAGING	02/10/2014 YOSHIMUJ

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	193.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.5	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	36.0	0.0	0.0
Q2:	0.0	0.0	36.0	0.0	0.0
Q3:	0.0	0.0	37.0	0.0	0.0
Q4:	0.0	0.0	37.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					