



NOV 15 2011

Mr. Chris Berard
Pactiv Corporation
5370 E Home Ave
Fresno, CA 93727

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # C-1112955**

Dear Mr. Berard:

The Air Pollution Control Officer has issued an Authority to Construct (C-36-2-10) with a Certificate of Conformity to Pactiv Corporation. The facility proposes to re-instate conditions to clarify the thermal oxidizer can be non-operational during complete production shutdown.

Enclosed is the Authority to Construct and invoice. The application and proposal were sent to US EPA Region IX on October 10, 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

Enclosures
st

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
www.valleyair.org www.healthyairliving.com

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



NOV 15 2011

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 # C-1112955**

Dear Mr. Rios:

The Air Pollution Control Officer has issued an Authority to Construct (C-36-2-10) with a Certificate of Conformity to Pactiv Corporation. The facility proposes to re-instate conditions to clarify the thermal oxidizer can be non-operational during complete production shutdown.

Enclosed are copies of the Authority to Construct. The application and proposal were sent to US EPA Region IX on October 10, 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

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AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-2-10

ISSUANCE DATE: 11/14/2011

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM EXTRUSION LINE #1 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD SERVED BY A 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER: RE-INSTATE CONDITIONS TO CLARIFY THERMAL OXIDIZER CAN BE NON-OPERATIONAL DURING COMPLETE PRODUCTION SHUTDOWN

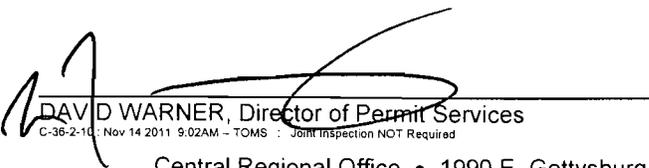
CONDITIONS

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. Authorities to Construct (ATC's) C-36-2-7 and '2-9 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-36-2-10: Nov 14 2011 9:02AM - TOMS : Joint Inspection NOT Required

6. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shutdowns. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Shut down of the thermal oxidizer for routine maintenance shall be recorded and shall not exceed a total of 20 hours per calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
11. The destruction efficiency of the thermal oxidizer shall be maintained at a minimum of 95%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rules 1081, 2301 and 4682] Federally Enforceable Through Title V Permit
12. The exhaust stack of the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
13. The thermal oxidizer shall only be fired on PUC-regulated natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The average total VOC blowing agent consumption for the entire facility shall not exceed 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed 1,500 lb/day. [District Rule 4102]
18. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
19. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
21. Emissions from the combustion of natural gas in the RTO burner shall not exceed any of the following limits: 0.10 lb-NOx/MMBtu; 0.084 lb-CO/MMBtu; 0.0076 lb-PM10/MMBtu; or 0.00285 lb-SOx/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The permittee shall maintain the thermal oxidizer in accordance with the manufacturer's instructions. A copy of the manufacturer's instructions shall be kept onsite and made available for inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The combustion zone of the thermal oxidizer shall be maintained at a minimum of 1,500 degrees Fahrenheit. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device, in operation at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
25. The permittee shall maintain the following minimum air flow rates (scfm) from the respective production areas to the thermal oxidizer when in production: 3500 from the roll storage warehouse; 528 from each foam extrusion die hood; and 203 from each reclaim line smog hog. [District NSR Rule] Federally Enforceable Through Title V Permit
26. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
27. Source testing to measure the minimum destruction efficiency of the thermal oxidizer and the minimum air flow rates from each production area shall be conducted at least once every twelve months. [District NSR Rule] Federally Enforceable Through Title V Permit
28. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
29. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
30. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
31. The following test methods shall be used: air flow rates - EPA Method 1 or 2; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC - EPA Method 25 or 25A or ARB Method 100, referenced as methane; exempt VOC compounds - EPA Method 18, or alternative equivalent District and EPA approved test methods. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
32. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit
33. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be calculated using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$$
where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
34. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
35. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

36. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
37. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
38. The permittee shall maintain accurate daily records of the thermal oxidizer combustion temperature. [District NSR Rule and District Rule 4682, 6.1.2] Federally Enforceable Through Title V Permit
39. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit