



MAR 14 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 # 1120446**

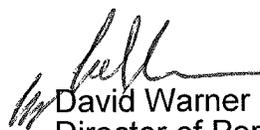
Dear Mr. Rios:

The Air Pollution Control Officer has issued Authorities to Construct (S-892-10-31, '-10-32, and '-10-33) with Certificates of Conformity to Pactiv, LLC. The project authorizes modification of 3 extrusion cooling 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 March 1, 2012. 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

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



MAR 14 2012

Mr. Mike Perez
Pactiv, LLC
2024 Norris Road
Bakersfield, CA 93308

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # 1120446**

Dear Mr. Perez:

The Air Pollution Control Officer has issued Authorities to Construct (S-892-10-31, '-10-32, and '-10-33) with Certificates of Conformity to Pactiv, LLC. The project authorizes modification of 3 extrusion cooling 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 March 1, 2012. 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
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Tel: 661-392-5500 FAX: 661-392-5585



AUTHORITY TO CONSTRUCT

PERMIT NO: S-892-10-31

ISSUANCE DATE: 03/12/2012

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
ATTN: ENVIRONMENTAL ENGINEER
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 CO2 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-892-10-31 : Mar 12 2012 1:36PM -- 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-892-10-32

ISSUANCE DATE: 03/12/2012

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
ATTN: ENVIRONMENTAL ENGINEER
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 CO2 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

DAVID WARNER, Director of Permit Services

S-892-10-32 : Mar 12 2012 1:36PM -- 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
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
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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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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
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AUTHORITY TO CONSTRUCT

PERMIT NO: S-892-10-33

ISSUANCE DATE: 03/12/2012

LEGAL OWNER OR OPERATOR: PACTIV LLC
MAILING ADDRESS: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

LOCATION: 2024 NORRIS RD
ATTN: ENVIRONMENTAL ENGINEER
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SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:
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CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED

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Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services

S-892-10-33 : Mar 12 2012 1:36PM - EDGEHILR : Joint Inspection NOT Required

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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: $(\text{actual daily hours}) \times ((\text{total polystyrene foam processed in month}) / (\text{total hours of operation in month}))$. [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



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

Due Date
5/11/2012

Amount Due
\$ 427.00

Amount Enclosed

ATCFEE S1120446
892 S99261 3/12/2012

RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO:

PACTIV LLC
2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

SJVAPCD
34946 Flyover Court
Bakersfield, CA 93308

Thank You!



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

SJVAPCD Tax ID: 77-0262563

PACTIV LLC
2024 NORRIS RD
ATTN: ENVIRONMENTAL ENGINEER
BAKERSFIELD, CA 93308-2297

Facility ID
S892

Invoice Date
3/12/2012

Invoice Number
S99261

Invoice Type
Project: S1120446

PROJECT NUMBER: 1120446

APPLICATION FILING FEES	\$ 213.00
ENGINEERING TIME FEES	\$ 214.00
TOTAL FEES	\$ 427.00
LESS PREVIOUSLY PAID PROJECT FEES APPLIED TO THIS INVOICE	\$ 0.00
PROJECT FEES DUE (Enclosed is a detailed statement outlining the fees for each item.)	\$ 427.00

Late Payment (see Rule 3010, Section 11.0 Late Fees)	
Postmarked	Total Due
After 5/11/2012 through 5/21/2012	\$ 469.70
After 5/21/2012	\$ 640.50
After 6/10/2012	Permits To Operate MAY BE SUSPENDED

San Joaquin Valley Air Pollution Control District
34946 Flyover Court, Bakersfield, CA 93308, (661) 392-5500, Fax (661) 392-5585

Invoice Detail

Facility ID: S892

PACTIV LLC
 2024 NORRIS RD
 ATTN: ENVIRONMENTAL ENGINEER
 BAKERSFIELD, CA 93308-2297

Invoice Nbr: S99261
 Invoice Date: 3/12/2012
 Page: 1

Application Filing Fees

Project Nbr	Permit Number	Description	Application Fee
S1120446	S-892-10-31	MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES: CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED	\$ 71.00
S1120446	S-892-10-32	MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES: CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED	\$ 71.00
S1120446	S-892-10-33	MODIFICATION OF POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES: CONVERT ONE FOAM EXTRUSION LINE TO AIR COOLED	\$ 71.00
Total Application Filing Fees:			\$ 213.00

Engineering Time Fees

Project Nbr	Quantity	Rate	Description	Fee
S1120446	1 hours	\$ 147.00 /h	After-Hours Engineering Time(OverTime)	\$ 147.00
			Less Credit For Application Filing Fees	(\$ 147.00)
			After-Hours Engineering Time(OverTime) SubTotal	\$ 0.00
S1120446	2.8 hours	\$ 100.00 /h	Standard Engineering Time	\$ 280.00
			Less Credit For Application Filing Fees	(\$ 66.00)
			Standard Engineering Time SubTotal	\$ 214.00
Total Engineering Time Fees:				\$ 214.00