



DEC 11 2014

Mike Perez
Pactiv LLC
2024 Norris Rd
Bakersfield, CA 93308

RE: Final – Authority to Construct/Certificate of Conformity (Minor Mod)
Facility Number: S-892
Project Number: S-1143209

Dear Mr. Perez:

The Air Pollution Control Officer has issued the Authority to Construct permits to Pactiv LLC for adding additional baghouse inspection and monitoring provisions top three plastics processing permits, at 2024 Norris Road in Bakersfield.

Enclosed are the Authority to Construct permits and invoice for the engineering evaluation fees pursuant to District Rule 3010. The District's analysis of the proposal was sent to US EPA Region IX on October 28, 2014. 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 at (661) 392-5500.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:spl

Enclosures

Seyed Sadredin

cc: Gerardo C. Rios, EPA (w/enclosure) via email
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



AUTHORITY TO CONSTRUCT

PERMIT NO: S-892-23-6

ISSUANCE DATE: 12/03/2014

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

LOCATION: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE, POLYETHYLENE AND/OR POLYPROPYLENE RESIN RECEIVING AND STORAGE OPERATION INCLUDING ONE 4300 CUBIC FOOT AND ONE 3000 CUBIC FOOT STORAGE SILOS WITH BIN VENT FILTERS: ADD FABRIC FILTER INSPECTION AND MONITORING CONDITIONS FOR CONSISTENCY WITH OTHER FACILITY PERMITS

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. The bin vent filter shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Visible emissions shall be inspected weekly 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. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 1081, 5.0; 2201; 2520, 9.0; 4101, 6.0; and 4201, 4.0] 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


Maude Marjollet, Director of Permit Services

S-892-23-6 : Dec 3 2014 9:36AM - LEONARDS : Joint Inspection NOT Required

5. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
6. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters 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, 9.0] Federally Enforceable Through Title V Permit
7. The combined maximum quantity of polystyrene/polypropylene/polyethylene resin transferred into the storage silos shall not exceed either of the following limits: 400,000 lbs of resin per day or 21,000,000 lbs of resin per year. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions from each of the bin vent filters serving the storage silos shall not exceed 0.0002018 lb-PM10/1000 lb of resin transferred into each silo. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The bin vent filters shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The bin vent filters cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Material removed from the bin vent filters shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
12. A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Differential operating pressure of the bin vent filters shall be monitored when the silo is receiving product. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of all maintenance of each bin vent filter, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Operator shall maintain records of amount of polystyrene/polypropylene/polyethylene resin received, at least on a monthly basis, and days on which transfer to the silos occurs. [District Rule 2201] Federally Enforceable Through Title V Permit
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: S-892-24-4

ISSUANCE DATE: 12/03/2014

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

LOCATION: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

EQUIPMENT DESCRIPTION:
MODIFICATION OF POLYSTYRENE, POLYPROPYLENE AND POLYETHYLENE LOADOUT AND TRANSFER OPERATION INCLUDING VACUUM BLOWERS SERVED BY AIR DISCHARGE FABRIC FILTER COLLECTOR TRANSPORTING RESIN TO DAY BIN STORAGE AND MIXING BINS AND PERMIT EXEMPT INJECTION MOLDING MACHINES (NO PLASTICIZER OR BLOWING AGENT PRESENT); ADD FABRIC FILTER INSPECTION AND MONITORING CONDITIONS FOR CONSISTENCY WITH OTHER FACILITY PERMITS

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. Visible emissions shall be inspected weekly 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. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 1081, 5.0; 2201; 2520, 9.0; 4101, 6.0; and 4201, 4.0] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit. [District Rule 4201, 3.0] 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

Arnaud Marjollet, Director of Permit Services

S-892-24-4 : Dec 3 2014 9:36AM - LEONARDS : Joint Inspection NOT Required

5. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters 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, 9.0] Federally Enforceable Through Title V Permit
6. Emissions from the fabric filter serving the loadout and transfer operation shall not exceed 0.000706 lb-PM10/1000 lb of resin transferred out of each silo. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The combined maximum quantity of polystyrene/polypropylene/polyethylene resin transferred out of the storage silos shall not exceed either of the following limits: 57,535 lbs of resin per day or 21,000,000 lbs of resin per year. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The fabric filter shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The fabric filters cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Material removed from the fabric filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
11. A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Records of all maintenance of the fabric filter, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Operator shall maintain records of monthly amount of polystyrene/polypropylene/polyethylene resin transferred and total hours of operation per month. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Operator shall maintain records of daily scheduled hours of operation. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Daily records shall be calculated by the following equation: $(\text{scheduled daily hours}) \times ((\text{total polystyrene/polypropylene/polyethylene resin transferred in month}) / (\text{total hours of operation in month}))$. [District Rule 2201] Federally Enforceable Through Title V Permit
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: S-892-25-4

ISSUANCE DATE: 12/03/2014

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

LOCATION: 2024 NORRIS RD
BAKERSFIELD, CA 93308-2297

EQUIPMENT DESCRIPTION:

MODIFICATION OF OFFLINE POLYSTYRENE, POLYPROPYLENE AND POLYETHYLENE SCRAP GRINDING OPERATION CONSISTING OF TWO GRINDERS EACH SERVED BY CYCLONE VENTED TO A FABRIC SOCK FILTER: ADD FABRIC FILTER INSPECTION AND MONITORING CONDITIONS FOR CONSISTENCY WITH OTHER FACILITY PERMITS

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. Visible emissions shall be inspected weekly 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. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 1081, 5.0; 2201; 2520, 9.0; 4101, 6.0; and 4201, 4.0] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit. [District Rule 4201, 3.0] 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

Arnaud Marjollet, Director of Permit Services

S-892-25-4 : Dec 3 2014 9:36AM -- LEONARDS : Joint Inspection NOT Required

5. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Sock filters 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, 9.0] Federally Enforceable Through Title V Permit
6. Emissions from each of the sock filters serving the grinding operation shall not exceed 0.000585 lb-PM10/1000 lb of scrap processed. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The combined maximum quantity of polystyrene/polypropylene/polyethylene scrap processed shall not exceed either of the following limits: 1,726 lbs of scrap per day or 630,000 lbs of scrap per year. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The sock filters shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The sock filters cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Material removed from the sock filters shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
11. A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Records of all maintenance of each sock filter, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Operator shall maintain records of monthly amount of polystyrene/polypropylene/polyethylene scrap processed and total hours of operation per month. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Operator shall maintain records of daily scheduled hours of operation. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene/polypropylene/polyethylene scrap processed in month) / (total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit