



APR 08 2014

Mr. Michael Perez
Pactiv LLC
2024 Norris Rd
Bakersfield, CA 93308

Re: Notice of Minor Title V Permit Modification
District Facility # S-892
Project # S-1141403

Dear Mr. Perez:

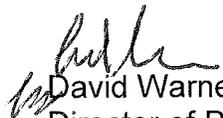
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) S-892-23-2 into the Title V operating permit. The ATC modifies the permit for a polypropylene and polyethylene resin unloading and storage operation by increasing the allowable amount of raw material received on a daily basis to accommodate railcar shipment quantities. Annual quantity of resin received remains the same.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct (ATC) S-892-23-2, emission increases, and your application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

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

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1141403

Engineer: Stephen Leonard
Date: March 31, 2014

Facility Number: S-892
Facility Name: Pactiv LLC
Mailing Address: 2024 Norris Road
Bakersfield, CA 93308

Reviewed by A. S. V. A. Q. E.

MAR 31 2014

Contact Name: Jim Wakeman
Phone: 661-331-4062

Responsible Official: Mike Perez
Title: Plant Manager

I. PROPOSAL

Pactiv LLC is proposing a Title V minor permit modification to incorporate Authority to Construct (ATC) document S-892-23-2 from District project S-1141223 into the Title V operating permit.

The ATC modifies the permit for a polypropylene and polyethylene resin unloading and storage operation (S-892-23-1) by increasing the allowable amount of raw material received on a daily basis to accommodate railcar shipment quantities. Annual quantity of resin received remains the same.

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

II. FACILITY LOCATION

The Pactiv facility is located at 2024 Norris Road in Bakersfield.

III. EQUIPMENT DESCRIPTION

S-892-23-3: 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

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

S-892-23-3:

Condition # on current PTO S-892-23-1	Condition # on proposed PTO S-892-23-3	Condition is: New, Modified, or Removed	Reason for Change from current PTO
3	3	Modified	Represents increase in daily throughput
11	11	Modified	Days of transfer operation more relevant than hours for DEL compliance determination
12	--	Removed	Not relevant to product receiving and storage operation
13	--	Removed	Not relevant to product receiving and storage operation

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has

assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
 6. Do not seek to consolidate overlapping applicable requirements.

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

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

VIII. ATTACHMENTS

- A. Proposed Title V Operating Permit Unit S-892-23-3
- B. Authority to Construct S-892-23-2
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit Unit S-892-23-1

Pactiv LLC
S-892
S-1141403

ATTACHMENT A

Proposed Title V Operating Permit Unit S-892-23-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-23-3

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. 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
2. Visible emissions from the bin vent filters shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The combined maximum quantity of 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
4. 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
5. The bin vent filters shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
6. 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
7. 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
8. A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. Operator shall maintain records of amount of 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
12. 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

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

Pactiv LLC
S-892
S-1141403

ATTACHMENT B

Authority to Construct S-892-23-2



AUTHORITY TO CONSTRUCT

PERMIT NO: S-892-23-2

ISSUANCE DATE: 03/25/2014

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 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: INCREASE MAXIMUM DAILY AMOUNT OF RESIN RECEIVED AND REVISE RECORDKEEPING PROCEDURES

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. 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
3. Visible emissions from the bin vent filters shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The combined maximum quantity of 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
5. 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
6. The bin vent filters shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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

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

8. 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
9. A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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
11. 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
12. Operator shall maintain records of amount of 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
13. 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

Pactiv LLC
S-892
S-1141403

ATTACHMENT C

Emissions Increases

Pactiv LLC
S-892
S-1141403

	SSIPE (lb/yr)				
	NO _x	VOC	CO	SO _x	PM10
S-892-23-3	0	0	0	0	0
TOTAL	0	0	0	0	0

Pactiv LLC
S-892
S-1141403

ATTACHMENT D

Application

S-892-23-3

RECEIVED

MAR 27 2014

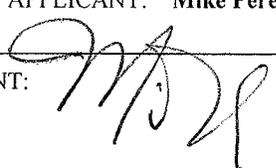
SJVAPCD
Southern Region

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Pactiv LLC	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>2024 Norris Road</u> CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93308-2297</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>2024 Norris Rd</u> CITY: <u>Bakersfield</u> ¼ SECTION <u>NE10</u> TOWNSHIP <u>29S</u> RANGE <u>27E</u>	INSTALLATION DATE: 4/30/14
4. GENERAL NATURE OF BUSINESS: Polypropylene and Polyethylene injection Molding	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Conversion of ATCs – S-892-23-2 – INCREASE MAXIMUM DAILY AMOUNT OF RESIN RECEIVED AND REVISE RECORDKEEPING PROCEDURES Convert ATC S-892-23-2 to PTO	
6. TYPE OR PRINT NAME OF APPLICANT: Mike Perez	TITLE OF APPLICANT: PLANT MANAGER
7. SIGNATURE OF APPLICANT:  DATE: <u>3/21/14</u>	PHONE: (661) 392-4020 FAX: (661) 392-4060 EMAIL: sstewart@pactiv.com

For APCD Use Only:

NO \$

DATE STAMP	FILING FEE RECEIVED : \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>S-1141403</u> FACILITY ID: <u>S-892</u>

Title V - Minor Mod

MAR 27 2014

SJVAPCD
Southern Region

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

SIGNIFICANT PERMIT MODIFICATION
 MINOR PERMIT MODIFICATION

ADMINISTRATIVE
AMENDMENT

COMPANY NAME: Pactiv LLC	FACILITY ID: S - 892
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Pactiv LLC	
3. Agent to the Owner:	

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

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

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:
March 27, 2014

Signature of Responsible Official

Date

Mike Perez

Name of Responsible Official (please print)

Plant Manager

Title of Responsible Official (please print)

Pactiv LLC
S-892
S-1141403

ATTACHMENT E

Previous Title V Operating Permit
Unit S-892-23-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-23-1

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. 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
2. Visible emissions from the bin vent filters shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The combined maximum quantity of polypropylene/polyethylene resin transferred into 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
4. 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
5. The bin vent filters shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
6. 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
7. 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
8. A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Differential operating pressure shall be monitored on each day that the bin vent filters operate. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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
11. Operator shall maintain records of monthly amount of polypropylene/polyethylene resin transferred and total hours of operation per month. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Operator shall maintain records of daily scheduled hours of operation. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polypropylene/polyethylene resin transferred in month) / (total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
14. 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

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