



March 28, 2023

Mr. Dennis Hughes Pactiv LLC 2024 Norris Rd Bakersfield, CA 93308

Re: Notice of Preliminary Decision - Title V Permit Renewal

Facility Number: S-892 **Project Number: S-1212597**

Dear Mr. Hughes:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Pactiv LLC at 2024 Norris Rd, Bakersfield, California.

The notice of preliminary decision for this project has been posted on the District's website (www.valleyair.org). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Sincerely,

Brian Clements

Director of Permit Services

Enclosures

CC: Courtney Graham, CARB (w/enclosure) via email

Gerardo Rios, EPA (w/enclosure) via EPS CC:

> Samir Sheikh **Executive Director/Air Pollution Control Officer**

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation Pactiv LLC S-892

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TITLE V PERMIT RENEWAL EVALUATION

Thermoplastic Foam Products Manufacturing

Engineer: Christian Bisher

Date: March 23, 2023

Facility Number: S-892
Facility Name: Pactiv LLC
Mailing Address: 2024 Norris Rd

Bakersfield, CA 93308

Contact Name: Mike Perez Phone: (661) 392-4020

Responsible Official: Mike Perez

Title: Plant Manager

Project #: S-1212597 **Deemed Complete:** July 9, 2021

I. PROPOSAL

Pactiv LLC was issued a Title V permit on January 22, 2018. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to ensure the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

S-892 is located at 2024 Norris Rd in Bakersfield, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant does not propose to use any model general permit templates.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated or Evaluated

- District Rule 2201, New and Modified Stationary Source Review Rule (amended August 15, 2019)
- District Rule 2520, <u>Federally Mandated Operating Permits</u>, (amended August 15, 2019)
- District Rule 4601, <u>Architectural Coatings</u> (amended April 16, 2020 SIP approved on December 14, 2022)
- District Rule 4702, <u>Internal Combustion Engines</u> (amended August 19, 2021)
- 40 CFR Part 64, Compliance Assurance Monitoring (amended October 22, 1997)
- 40 CFR Part 82, Subpart B, <u>Servicing of Motor Vehicle Air Conditioners</u> (amended March 24, 2021)
- 40 CFR Part 82, Subpart F, <u>Recycling and Emissions Reduction</u> (amended April 10, 2020)

B. Rules Added

 40 CFR Part 60, Subpart IIII, <u>Standards of Performance for Stationary</u> <u>Compression Ignition Internal Combustion Engines</u> (amended August 10, 2022)

C. Rules Not Updated

- District Rule 1070, <u>Inspections</u> (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 1160, <u>Emission Statements</u> (amended November 18,1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2020, Exemptions (amended December 18, 2014)
- District Rule 2031, <u>Transfer of Permits</u> (amended December 17, 1992)
- District Rule 2070, <u>Standards for Granting Applications</u>, Section 7.0 (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4201, <u>Particulate Matter Concentration</u> (amended December 17, 1992)
- District Rule 4623, Storage of Organic Liquids (amended May 19, 2005)
- District Rule 4682, <u>Polystyrene</u>, <u>Polyethylene</u>, <u>and Polypropylene Products</u>
 <u>Manufacturing</u> (amended December 15, 2011)
- District Rule 8011, <u>Fugitive Dust General Requirements</u> (amended August 19, 2004)
- District Rule 8021, <u>Construction</u>, <u>Demolition Excavation</u>, <u>Extraction</u>, <u>and Other Earthmoving Activities</u> (amended August 19, 2004)
- District Rule 8031, Bulk Materials (amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (amended August 19, 2004)

- District Rule 8051, Open Areas (amended August 19, 2004)
- District Rule 8061, <u>Paved and Unpaved Roads</u> (amended August 19, 2004)
- District Rule 8071, <u>Unpaved Vehicle/Equipment Traffic Areas</u> (amended September 16, 2004)
- 40 CFR Part 61, Subpart M, <u>National Emission Standards for Asbestos</u> (amended July 20, 2004)
- 40 CFR Part 64, <u>Compliance Assurance Monitoring</u> (amended October 22, 1997)
- 40 CFR Part 68, <u>Chemical Accident Prevention Provisions</u> (amended December 19, 2019)

D. Rules Removed

- 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (amended August 10, 2022)
- Title 13 CCR, Section 2423, Exhaust Emission Standards and Test Procedures – Off-Road Compression-Ignition Engines (amended January 6, 2006)
- Kern County Rule 111, <u>Equipment Breakdown</u> (District resolution to rescind from SIP 2/17/2022)
- Kern County Rule 401, <u>Visible Emissions</u> ⇒ Not required since District Rule 4101 is SIP approved.
- Kern County Rule 407, <u>Sulfuric Compounds</u> ⇒ Not referenced in any permit unit.
- District Rule 1080, <u>Stack Monitoring</u> ⇒ Not referenced in any permit unit.
- District Rule 2410, <u>Prevention of Significant Deterioration</u> ⇒ Not referenced in any permit unit.

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

A. Rules Not Updated

- District Rule 1100, <u>Equipment Breakdown</u> (amended December 17, 1992)
- District Rule 2040, <u>Applications</u> (amended December 17, 1992)
- District Rule 4102, Nuisance (as amended December 17, 1992)
- Title 17 CCR, Section 93115, <u>Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines</u> (effective May 19, 2011)

B. Rules Added

• District Rule 4801, <u>Sulfur Compounds</u> (amended December 17, 1992)

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit or most recent renewal of the Title V permit. Rules that have not been updated but are being evaluated for compliances purposes will also be addressed here.

A. District Rule 2201 - New and Modified Stationary Source Review Rule (NSR)

District Rule 2201 has been amended since this Title V permit was last renewed. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit.

B. District Rule 2520 – Federally Mandated Operating Permits

District Rule 2520 has been amended since this facility's last Title V permit renewal. However, the amendments to this rule were administrative, relating only to the notification procedures for Title V permit modifications that are required to go through a public notice. The amendments to this rule did not have any effect on the current permit requirements and will therefore not be addressed further in this evaluation. However, greenhouse gas emissions will be addressed under Rule 2520 during this renewal.

Greenhouse Gas Discussion

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40 CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40 CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

C. District Rule 4601 - Architectural Coatings

District Rule 4601 was last amended on April 16, 2020. EPA approved District Rule 4601 as amended on April 16, 2020 for inclusion in the SIP on December 14, 2022.

The purpose of this rule is to limit VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements. This rule is applicable to any person who supplies, markets, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the San Joaquin Valley Air Pollution Control District.

As required by a September 2016 decision by the U.S. Court of Appeals for the Ninth Circuit in *Bahr v. U.S. Environmental Protection Agency*, the April 16, 2020 amendments to District Rule 4601 added a contingency measure for the District's 2016 Ozone Plan that would remove the exemption for specific categories of coatings sold in small containers with a volume of one liter or less if EPA issues a finding that the San Joaquin Valley Air Basin has failed to attain, or to make reasonable further progress towards attainment of, the 2008 National Ambient Air Quality Standard (NAAQS) for ozone. The April 16, 2020 amendments to District Rule 4601 implemented provisions of the 2019 California Air Resources Board (ARB) Suggested Control Measure for

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¹ United States Court of Appeals for the Ninth Circuit (September 12, 2016) Bahr v. U.S. Environmental Protection Agency. https://cdn.ca9.uscourts.gov/datastore/opinions/2016/09/12/14-72327.pdf

Architectural Coatings,² including lowering VOC limits for several categories of architectural coatings, setting VOC limits for three new categories of architectural coatings, and adding new requirements for colorants.

The primary effect of the April 16, 2020 amendments to District Rule 4601 was reducing VOC content limits required for specific categories of coatings and adding VOC content limits for specific categories of colorants. The previous VOC content limits of District Rule 4601 and the VOC content limits of coatings and colorants that became effective on and after January 1, 2022 are summarized below.

Section 5.1 - VOC Content Limits:

Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, market or offer for sale within the District; or solicit for application or apply within the District any architectural coating or colorant with a VOC content in excess of the corresponding limit specified in Table 1 or Table 2, after the specified effective date in Table 1 or Table 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.

Rule 4601, Table 1 - VOC Content Limits for Coatings ¹		
COATING CATEGORY	Previous VOC Limit (g/l)	VOC Limit (g/l) Effective on and after 1/1/2022
Flat Coatings	50	50
Nonflat Coatings	100	50
Specialty Coatings	-	-
Aluminum Roof Coatings	400	100
Basement Specialty Coatings	400	400
Bituminous Roof Coatings	50	50
Bituminous Roof Primers	350	350
Bond Breakers	350	350
Building Envelope Coatings	-	50
Concrete Curing Compounds	350	350
Concrete/Masonry Sealers	100	100
Driveway Sealers	50	50
Dry Fog Coatings	150	50
Faux Finishing Coatings	350	350
Fire Resistive Coatings	350	150
Floor Coatings	100	50

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² California Air Resources Board (May 2019) California Air Resources Board (CARB) Suggested Control Measure for Architectural Coatings. https://ww2.arb.ca.gov/sites/default/files/2020-05/10602_scm_final.pdf

Rule 4601, Table 1 - VOC Content Limits for Coatings ¹			
COATING CATEGORY	Previous VOC Limit (g/l)	VOC Limit (g/l) Effective on and after 1/1/2022	
Form-Release Compounds	250	100	
Graphic Arts Coatings (Sign Paints)	500	500	
High Temperature Coatings	420	420	
Industrial Maintenance Coatings	250	250	
Low Solids Coatings ²	120	120	
Magnesite Cement Coatings	450	450	
Mastic Texture Coatings	100	100	
Metallic Pigmented Coatings	500	500	
Multi-Color Coatings	250	250	
Pre-Treatment Wash Primers	420	420	
Primers, Sealers, and Undercoaters	100	100	
Reactive Penetrating Sealers	350	350	
Recycled Coatings	250	250	
Roof Coatings	50	50	
Rust Preventative Coatings	250	250	
Shellacs:			
Clear	730	730	
Opaque	550	550	
Specialty Primers, Sealers, and Undercoaters	100	100	
Stains	250	100	
Interior Stains		250	
Stone Consolidants	450	450	
Swimming Pool Coatings	340	340	
Tile and Stone Sealers		100	
Traffic Marking Coatings	100	100	
Tub and Tile Refinish Coatings	420	420	
Waterproofing Membranes	250	100	
Wood Coatings	275	275	
Wood Preservatives	350	350	
Zinc-Rich Primers	340	340	

¹ Limits are expressed as VOC Regulatory (except where noted otherwise), thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases

² Units are grams of VOC per liter of coating, including water and exempt compounds, in accordance with Section 3.72.

Rule 4601, Table 2 VOC Content Limits for Colorants ¹			
Colorants Added To	VOC Limit (g/l) Effective on and after 1/1/2022		
Architectural Coatings, excluding Industrial Maintenance Coatings	50		
Solvent Based Industrial Maintenance Coatings	600		
Waterborne Industrial Maintenance Coatings	50		
Wood Coatings	600		

¹ Limits are expressed as VOC Regulatory.

The following conditions of the proposed requirements of the facility-wide permit (S-892-0-5) were updated to remain consistent with the current rule and to ensure compliance with this rule.

- 25. No person shall: manufacture, blend, or repackage for use within the District; or supply, sell, market or offer for sale within the District; or solicit for application or apply within the District any architectural coating or colorant with a VOC content in excess of the corresponding limit specified in Table 1 or Table 2 of District Rule 4601 (4/16/20), after the specified effective dates in Table 1 or Table 2 of District Rule 4601. [District Rule 4601, 5.1]
- 26. All architectural coating containers and containers of any VOC-containing materials subject to District Rule 4601 (4/16/20) shall be closed when not in use. [District Rule 4601, 5.4]
- 27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in District Rule 4601, sections 6.1 and 6.3 (4/16/20). [District Rule 4601, 6.1 and 6.3]

D. District Rule 4702 – Internal Combustion Engines

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_X), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM), and sulfur oxides (SO_X) from internal combustion engines. This rule applies to any internal combustion engine with a rated at 25 brake horsepower or greater.

The following permit is for an internal combustion engine for which this subpart applies:

S-892-28-2: 260 BHP CUMMINS MODEL QSB6.7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

The requirements of District Rule 4702 as amended November 14, 2013 were incorporated into the SIP on April 25, 2016. District Rule 4702 was subsequently amended on August 19, 2021; however, those amendments have not been including in the SIP.

The permit for Pactiv LLC includes a diesel-fired emergency IC engine powering a firewater pump. The IC engine permitted at this facility is subject to the requirements of District Rule 4702.

While evaluating this Title V renewal, it was discovered that permit S-892-0-4, condition number 45 is the same condition as permit S-892-28-1, condition number 19. To avoid duplicate condtions, permit S-892-28-1, condition number 19 will not be carried over to the renewed permit.

Pursuant to Section 4.2, the only requirements that apply to emergency standby engines are the requirements of Section 5.10 (monitoring requirements) and 6.2.3 (annual operating records requirements), which did not change during the rule amendment. Therefore, the following existing conditions will continue to demonstrate compliance with this rule.

Permit	Conditions Applicability	
S-892-0-5	44	District Rule 4702
S-892-28-2	5, 6, 8, 9, and 10	District Rule 4702

E. Title 13 CCR, Section 2423, Exhaust Emission Standards and Test Procedures – Off-Road Compression-Ignition Engines

Title 13 CCR, Section 2423 applies to new heavy-duty off-road compression-ignition engines, produced on or after January 1, 1996, and all other new 2000 and later model year off-road compression-ignition engines. The diesel-fired emergency IC engine powering a firewater pump in permit unit S-892-28 contains a condition with Title 13 CCR, Section 2423 as a reference.

While completing this Title V renewal engineering evaluation, it was discovered that the Section 2423 reference in permit unit S-892-28-1 originated from evaluating Title 17 CCR, Section 93115, Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines. Upon review of Title 17 CCR, Section 93115, only in-use emergency engines (engines installed prior to January 1, 2005) and emergency engines used in Demand Response Programs (DRP Engines) have requirements referencing Section 2423. The engine in permit unit S-892-28-1 was installed in 2018 and is not enrolled in a Demand Response Program. New diesel-fired compression-ignition emergency IC engines installed after January 1, 2005 do not have requirements referencing Title 13 CCR, Section 2423. Therefore, the Title 13

CCR, Section 2423 reference in permit unit S-892-28-1 condition 9 will be removed during this engineering evaluation.

F. 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Combustion Engines

The purpose of 40 CFR 60 Subpart IIII is to establish New Source Performance Standards (NSPS) to reduce emissions of NO_X, SO_X, PM, CO, and VOC from new stationary compression ignition (CI) internal combustion engines (ICE).

Section 60.4200(a)(2) states that the provisions of this subpart are applicable to owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are:

- (i) Manufactured after April 1, 2006, and are not fire pump engines, or
- (ii) Manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

The following permit is for a new stationary CI ICE powering a fire pump that commenced construction after July 1, 2006 for which this subpart applies:

S-892-28-2: 260 BHP CUMMINS MODEL QSB6.7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

Since the emergency engine under permit unit S-892-28-2 was installed in 2018, it is subject to this subpart.

Sections 60.4201 through 60.4203 apply to engine manufacturers. Therefore, these sections will not be discussed unless they are referenced later by another section of this subpart. Section 60.4204 applies to non-emergency engines and will therefore not be discussed here.

Section 60.4205(c) states that owners and operators of fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in table 4 to this subpart, for all pollutants. The emission standards for an engine in the 175-300 bhp range is listed below.

Table 4 – Emission Standards for Stationary Fire Pump Engines				
Maximum Engine Power	Model year(s)	NMHC + NOx (g/bhp-hr)	CO (g/bhp-hr)	PM (g/bhp-hr)
300≤HP≤600	2009+	3.0	2.6	0.15

The permitted emission limits for the emergency engine on permit unit S-892-28-2 are equal to or less than these limits. This subpart section will be added as a reference to the existing condition below to ensure continued compliance:

Emissions from this IC engine shall not exceed any of the following limits:
 2.9 g-NOx/bhp-hr,
 2.6 g- CO/bhp-hr,
 0.1 g-VOC/bhp-hr,
 or 0.15 g-PM10/bhp-hr. [District Rules 2201 and 4102;
 17 CCR 93115;
 40 CFR 60.4205(c) and 60.4211(c)]

Section 60.4206 states that owners or operators of stationary CI ICE must meet the applicable emission standards for the entire life of the engine. The compliant emission limits for the emergency engine are listed on permit unit S-892-28-2, ensuring compliance over the life of the engine.

Section 60.4207(b) states that beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 1090.305 for non-road diesel fuel. Section 1090.305 states that except as specified in Section 1090.300(a), the sulfur content for all non-road diesel fuel shall not exceed 15 ppm.

This subpart section will be added as a reference to the existing condition below to ensure continued compliance:

 Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801; 17 CCR 93115; 40 CFR 60.4207(b)]³

Section 60.4208 lists deadline dates for importing or installing stationary CI ICE produced in the previous model year. None of the deadline dates affects the engine in this project. Therefore, this section does not apply.

Section 60.4209 applies to emergency stationary CI engines that do not meet the applicable standards and stationary CI engines equipped with a diesel particulate filter. The engines in this project do not fall under either of these two categories. Therefore, this section does not apply.

Section 60.4210 applies only to engine manufacturers. Therefore, this section will not be discussed unless it is referenced later by another section of this subpart.

³ 15 ppm = 15 parts / 1,000,000 parts = 0.000015 = 0.0015%

Section 60.4211(a) states if you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:

- (1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions:
- (2) Change only those emission-related settings that are permitted by the manufacturer; and
- (3) Meet the requirements of 40 CFR part 1068, as they apply to you.

This subpart section will be added as a reference to the existing condition below to ensure continued compliance:

 This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702; 40 CFR 60.4211(a)]

Section 60.4211(b) applies to pre-2007 model year engines. None of the engines in this project are pre-2007 model year engines; therefore, this section does not apply.

Section 60.4211(c) states that if you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in Section 60.4204(b) or Section 60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to this subpart and must comply with the emission standards specified in Section 60.4205(c), you must comply by purchasing an engine certified to the emission standards in Section 60.4204(b), or Section 60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's specifications.

The facility installed a CI fire pump engine that was manufactured after 2009 as listed in Table 3 of this subpart, and the engine in this project is required to comply with the emission standards specified in Section 60.4205(c). Therefore, the requirements of this section apply.

Section 60.4204(b) is for non-emergency engines, so this requirement is not applicable. Section 60.4205(b) is for emergency, non-fire pump engines, so this section is not applicable. Section 60.4205(c) is for emergency, fire pump engines, which is applicable. However, the requirements of this section have already be evaluated and compliance has been shown earlier in this evaluation.

Therefore, Section 60.4211(c) will be added as a reference to the existing condition to ensure continued compliance:

Emissions from this IC engine shall not exceed any of the following limits:
 2.9 g-NOx/bhp-hr,
 2.6 g- CO/bhp-hr,
 0.1 g-VOC/bhp-hr,
 or 0.15 g-PM10/bhp-hr. [District Rules 2201 and 4102;
 17 CCR 93115;
 40 CFR 60.4205(c) and 60.4211(c)]

Section 60.4211(d) applies to owners or operators who must comply with the emission standards specified in Section 60.4204(c) or Section 60.4205(d), which are for engines with a displacement of greater than or equal to 30 liters per cylinder. The engines are not subject to the emission standards specified in Sections 60.4204(c) or 60.4205(d). Therefore, this section does not apply.

Section 60.4211(e) applies to owners or operators of modified or reconstructed stationary CI internal combustion engines. The engines in this project subject to this subpart have not been modified or reconstructed; therefore, this section does not apply.

Section 60.4211(f) applies to owners or operators of an emergency stationary ICE. This section states you must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3). In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (3) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (3) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. The engine is this project complies with the requirements of this section and is an emergency engine according to this section. This subpart section will be added as a reference to the existing condition below to ensure continued compliance:

 This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702; 17 CCR 93115; 40 CFR Part 60.4211(f)] Section 60.4211(g) applies to engines and control equipment that have not been installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions or the emission-related settings were changed. Section 60.4211(h) applies to engines with Auxiliary Emission Control Devices (AECDs) for qualified emergency situations. Neither of these sections apply to the emergency engine at this facility.

Section 60.4212 applies to owners or operators of a stationary CI engine with a displacement of less than 30 liters per cylinder and required to conduct performance tests pursuant to Section 60.4211(b). Section 60.4211(b) does not apply to these engines; therefore, performance tests are not required and this section does not apply.

Section 60.4213 applies to owners or operators of CI engines with a displacement of greater than or equal to 30 liters per cylinder. The displacement is less than 30 liters per cylinder for the engines in this project; therefore, this section does not apply.

Section 60.4214(a) states owners and operators of non-emergency stationary CI engines that are greater than 3,000 hp, or have a displacement of greater than or equal to 10 liters per cylinder, or are pre-2007 model year engines that are greater than 175 hp and not certified, must meet the requirements of paragraphs (a)(1) and (2) of this section. The engine at this facility is less than 3,000 hp, has a displacement less than 10 liters per cylinder, and was built after 2007. Therefore, this section does not apply.

Section 60.4214(b) states that if the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time. Since the engine at this facility meets the applicable standards, this section does not apply.

Section 60.4214(c) applies to stationary CI engines equipped with a diesel particulate filter. The engine under permit unit S-892-28-2 is not equipped with a diesel particulate filter. Therefore, this section does not apply.

Section 60.4214(d) requires annual reports for emergency stationary CI ICE that operator for the purposes specified in Section 60.4211(f)(3)(i). The emergency engine that this facility cannot operator for any of the non-emergency purposes listed under Section 60.4211(f)(3)(i). Therefore, this

section does not apply.

Section 60.4214(e) applies to engines equipped with AECDs. The engine in this project does not have an AECD, so this section does not apply.

Sections 60.4215 and 60.4216 apply to engines operated outside the continental United States. Therefore, these sections do not apply.

Section 60.4217 applies to engines that use special fuels and cannot meet the emission limits that the engine was originally certified to. Since the engines in this project are diesel-fired and meet the emission limits that the engines were originally certified to, this section does not apply.

G. Subpart ZZZZ 40 CFR Part 63, Subpart ZZZZ - <u>National Emissions</u> Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

Section 63.6585 states an owner or operator is subject to this subpart if it owns or operates a stationary RICE at a major or area source of HAP emissions. A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year. An area source of HAP emissions is a source that is not a major source.

This facility is an area source of HAP emissions since it is not a major source of HAPs per §63.6585(c).

The following permit is for a stationary RICE at an area source of HAP emissions for which this subpart applies:

S-892-28-2: 260 BHP CUMMINS MODEL QSB6.7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

§63.6590(a)(2)(iii) for stationary RICE located at an area source of HAP emissions, a stationary RICE is new if construction commenced on or after June 12, 2006.

The emergency engine under permit unit S-892-28-2 commenced construction in 2018 and is therefore a new stationary RICE and subject to this subpart.

Pursuant to Section 63.6590(c), an affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR Part 60, Subpart IIII, for compression engines or 40 CFR Part 60, Subpart JJJJ, for spark ignition engines. Since the engine under permit unit S-892-28-2 is a compression-ignition engine, 40 CFR Part 60, Subpart IIII is applicable.

As shown above in Section VIII.G, the emergency engine under permit unit S-892-28-2 is subject to 40 CFR 60, Subpart IIII and therefore meets the criteria of 63.6590(c)(1) as a new stationary RICE located at an area source. Therefore, the requirements of 40 CFR Part 63, Subpart ZZZZ will be met by meeting the requirements of 40 CFR Part 60, Subpart IIII, which has previously been shown. Per Section 63.6590(c), no further requirements from this subpart apply.

While evaluating this subpart, it was discovered that the original permitting engineering evaluation for permit unit S-892-28 continued evaluating this subpart past Section 63.6590(c), adding the requirements of the subpart to the permit. As previously stated, since no further requirements after Section 63.6590(c) are required, the conditions will not be added to permit S-892-28-2 created with this project and are listed in the table below for recordkeeping purposes.

Permit	Conditions Not Added to S-892-28-2	
S-892-28-1	12 through 18	

H. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

40 CFR Part 64 requires Compliance Assurance Monitoring for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

Pollutant	Major Source Threshold (Ib/year)
NO _X	20,000
SO _X	140,000
PM ₁₀	140,000
CO	200,000
VOC	20,000

a) S-892-1-12: VIRGIN RESIN UNLOADING AND STORAGE INCLUDING RAIL CAR UNLOADING FILTER/RECEIVER WITH 75 HP EXHAUST BLOWER, 60 HP FEED BLOWER, FOUR STORAGE SILOS, AND ONE FABRIC DUST COLLECTOR

Permit unit '-1 emits only particulate matter but is not subject to CAM for PM₁₀ since there is not a PM₁₀ emission limit that limits throughput for this operation. Therefore, CAM is not triggered by this unit.

b) S-892-2-25: VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

Permit unit '-2 has a PM₁₀ emission limit and add-on control devices in the form of an AEF Model FR-14-9 baghouse to control particulate matter emissions from the transfer of material from the storage silos to the extruders and a filter next to each extruder (501, 502, 503, 504, 505, 506, 507, 508, 509, and 510) to control particulate matter emissions as material is transferred from the use bins to the extruders. Therefore, the pre-control potential to emit (PE) must be calculated.

Since a single emissions condition limits particulate matter for the entire operation, CAM will be evaluated for the entire operation

```
EF<sub>PM10, Controlled</sub> = 0.008 lb-PM<sub>10</sub>/1,000 lb-product (PTO)
Throughput = 302,400 lb/day (PTO)
Control Efficiency = 99% (District Practice)
```

PE_{PM10}, Uncontrolled = EF_{PM10}, Uncontrolled x Throughput x Operating Time

= $0.8 \text{ lb-PM}_{10}/1,000 \text{ lb-product } x 302,400 \text{ lb/day } x 365 \text{ day/year}$ = $88,301 \text{ lb-PM}_{10}/\text{year}$

Since the pre-control potential to emit is less than the major source threshold of 140,000 lb-PM₁₀/year, CAM is not triggered for this unit.

c) S-892-4: THERMOPLASTIC RESIN FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE IN 11 FLUFF STORAGE SILOS, FOUR RECLAIM EXTRUDER LINES, VOC VAPOR COLLECTION SYSTEM, AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)

Permit unit '-4 includes a regenerative thermal oxidizer (RTO) that serves the following equipment from permit unit '-4:

- 17 trim grinders (PM₁₀ and VOC emissions) that vent to the fluff silos with 100% caputure efficiency,
- 1 roll grinder and 5 reclaim granulators (PM₁₀ and VOC emissions) that vent to the fluff silos with 100% caputure efficiency,
- 11 fluff silos including the transfer of fluff to the silos (PM₁₀ and VOC emissions) with three static baghouses serving the particulate matter with VOC emissions continuing to the RTO, and
- 4 reclaim extruder lines including the transfer of fluff to the reclaim extruders (PM₁₀ and VOC emissions) with fabric filters controlling particulate matter emissons from the material transfer.

None of the individually listed operations above have PM_{10} or VOC emission limits on the permit. Therefore, CAM cannot be triggered for these individual operations.

The permit does contain a PM_{10} emission limit at the RTO exhaust. PM_{10} emissions from the individual operations listed above are vented through fabric/bag filters before exiting through the vapor collection system and RTO. The RTO was not evaluated as a source of PM_{10} control. Therefore, this PM_{10} emission limit includes PM_{10} emissions from those operations. Permit unit '-4 also has add-on control devices for PM_{10} emissions in the form of fabric filters on each of the eleven fluff silos and bag filters at each of the four reclaim extruder fluff feed bins. Therefore, the pre-control potential to emit for PM_{10} emissions must be calculated.

The permit also contains a VOC emission limit. Permit unit '-4 has an addon control device for VOC emissions in the form of the RTO. Therefore, the pre-control potential to emit for VOC emissions must be calculated. The permit contains emission limits for NOx, SOx, and CO emissions produced by the RTO control device. However, these emissions do not have an additional device controlling them, so CAM cannot be trigger for these pollutants.

PM₁₀ Pre-Control PE

PE_{PM10, Controlled} = 14.6 lb-PM₁₀/day (PTO) Filter Control Efficiencies = 95% (Project S-1001076) PM10 emissions from RTO combustion = 1.92 lb/day (Project S-1001076)

PM₁₀ emissions from the RTO are subtracted from the PM₁₀ permit limit:

 $PE_{PM10, Controlled} = 14.6 \text{ lb-PM}_{10}/\text{day} - 1.92 \text{ lb-PM}_{10}/\text{day} = 12.7 \text{ lb-PM}_{10}/\text{day}$

The daily PM₁₀ emission limit is converted to annual emissions:

 $PE_{PM10, Controlled} = 12.7 \text{ lb-PM}_{10}/\text{day x } 365 \text{ day/year} = 4,636 \text{ lb-PM}_{10}/\text{year}$

All PM_{10} control devices have control efficiencies of 95%. Therefore, regardless of the individual operation producing the PM_{10} emissions in this permit unit, the annual PM_{10} emissions are uncontrolled for 95% efficient control devices:

```
PEPM10, Controlled = PEPM10, Uncontrolled x (1 - Control Efficiency)

PEPM10, Uncontrolled = PEPM10, Controlled ÷ (1 - Control Efficiency)

= 4,636 lb-PM10/year ÷ (1 - 0.95)

= 92,720 lb-PM10/year
```

Since the pre-control potential to emit is less than the major source threshold of 140,000 lb-PM₁₀/year, CAM is not triggered for this unit.

VOC Pre-Control PE

PEvoc, Controlled = 184.6 lb-VOC/day (PTO)

The daily VOC emission limit is converted to annual emissions:

 $PE_{VOC, Controlled} = 184.6 \text{ lb-VOC}_{10}/\text{day x } 365 \text{ day/year} = 67,379 \text{ lb-VOC/year}$

Since the controlled VOC emissions already exceed the VOC major source threshold, it is not necessary to check the that the pre-control potential to emit also exceeds the VOC major source threshold. This permit unit is subject to CAM for VOC emissions since it meets all three criteria for triggering CAM. CAM is satisfied by monitoring the thermal oxidizer combustion bed temperature, which is a surrogate parameter for proper thermal oxidizer operation. The thermal oxidizer combustion bed is

equipped with a thermocouple, which continuously measures the combustion bed temperature. Since the permit units' potential to emit after control is greater than the major source threshold, monitoring data must be collected every 15 minutes. The automated temperature logger records the temperature at least once every 15 minutes.

The following requirements will be retained on permit unit S-892-4-34 to ensure continued compliance.

Permit Condition		Applicability
S-892-4-34	14, 15	Federal Regulation 40 CFR Part 64

Additionally, the following conditions will be added to permit unit S-892-4-34 to satisfy the requirements of CAM:

- 16. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V permit
- 17. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V permit
- 18. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V permit

Lastly, the reclaim extruder lines under this permit unit also have three shared static bag filter systems that control particulate matter from the dryer after being extruded and cut into pieces. These PM_{10} emissions do not have a PM_{10} emission limit, and therefore, cannot trigger CAM.

d) S-892-5-26: RECLAIMED POLYSTYRENE PELLET (RPP) SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 10 RPP SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RPP USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

Permit unit '-5 has a PM₁₀ emission limit and add-on control devices in the form of three shared static baghouses serving the RPP silos, a AEF Model FR-14-9 baghouse serving the two blowers that transport material, and filter

for each use bin (10 total) all controlling particulate matter emissions. Therefore, the pre-control potential to emit must be calculated.

Since a single emissions condition limits particulate matter for the entire operation, CAM will be evaluated for the entire operation

EF_{PM10, Controlled} = 0.008 lb-PM₁₀/1,000 lb-product (PTO) Throughput = 302,400 lb/day (PTO) Control Efficiency = 99% (District Practice)

PE_{PM10}, Uncontrolled = EF_{PM10}, Uncontrolled x Throughput x Operating Time = 0.8 lb-PM₁₀/1,000 lb-product x 302,400 lb/day x 365 day/year = 88,301 lb-PM₁₀/year

Since the pre-control potential to emit is less than the major source threshold of 140,000 lb-PM₁₀/year, CAM is not triggered for this unit.

e) S-892-6-5: 12,000 GALLON BLOWING AGENT STORAGE VESSEL #1 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE

S-892-7-5: 12,000 GALLON BLOWING AGENT STORAGE VESSEL #2 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE

S-892-8-5: 12,000 GALLON BLOWING AGENT STORAGE VESSEL #3 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE.

S-892-22-3: 18,000 GALLON METHYL FORMATE PRESSURE VESSEL STORAGE TANK

Permit units '-6, '-7, '-8, and '-22 are pressurized storage vessels without control devices or emission limits. Therefore, CAM is not triggered for these units.

f) S-892-10-38: THERMOPLASTIC RESIN FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

Permit unit '-10 does not have a control device. Therefore, CAM cannot be trigger for this unit.

g) S-892-12-5: REPROCESSED POLYSTYRENE PELLET (RPP) BOX DUMPER OPERATION (24 TOTAL HP)

Permit unit '-12 does not have a control device. Therefore, CAM cannot be trigger for this unit.

h) S-892-17-29: THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS, HEAT TUNNELS AND TRIM PRESSES

Permit unit '-17 emits PM and VOCs. However, there is not a PM emission limit on the permit and there is not a control device for VOC emission. Therefore, CAM is not triggered by this unit.

i) S-892-23-8: 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

Permit unit '-23 has a PM_{10} emission limit and an add-on control device in the form of a bin vent filter to control particulate matter emissions. Therefore, the pre-control potential to emit must be calculated.

```
EF<sub>PM10, Controlled</sub> = 0.0002018 lb-PM<sub>10</sub>/1,000 lb-product (PTO)
Throughput = 21,000,000 lb/year (PTO)
Control Efficiency = 99% (District Practice)
```

```
PE<sub>PM10, Uncontrolled</sub> = EF<sub>PM10, Uncontrolled</sub> x Throughput
= 0.02018 lb-PM<sub>10</sub>/1,000 lb-product x 21,000,000 lb/year
= 424 lb-PM<sub>10</sub>/year
```

Since the pre-control potential to emit is less than the major source threshold of 140,000 lb-PM₁₀/year, CAM is not triggered for this unit.

j) S-892-24-6: 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)

Permit unit '-24 has a PM₁₀ emission limit and an add-on control device in the form of an air discharge fabric filter collector to control particulate matter emissions. Therefore, the pre-control potential to emit must be calculated.

```
EFPM10, Controlled = 0.000706 lb-PM10/1,000 lb-product (PTO)
Throughput = 21,000,000 lb/year (PTO)
Control Efficiency = 99% (District Practice)

EFPM10, Controlled = EFPM10, Uncontrolled x (1 - Control Efficiency)
EFPM10, Uncontrolled = EFPM10, Controlled ÷ (1 - Control Efficiency)
= 0.000706 lb-PM10/1,000 lb-product ÷ (1 - 0.99)
= 0.0706 lb-PM10/1,000 lb-product

PEPM10, Uncontrolled = EFPM10, Uncontrolled x Throughput
= 0.0706 lb-PM10/1,000 lb-product x 21,000,000 lb/year
```

 $= 1.483 \text{ lb-PM}_{10}/\text{year}$

Since the pre-control potential to emit is less than the major source threshold of 140,000 lb-PM₁₀/year, CAM is not triggered for this unit.

k) S-892-25-6: OFFLINE POLYSTYRENE, POLYPROPYLENE AND POLYETHYLENE SCRAP GRINDING OPERATION CONSISTING OF TWO GRINDERS EACH SERVED BY CYCLONE VENTED TO A FABRIC SOCK FILTER

Permit unit '-25 has a PM_{10} emission limit and an add-on control device in the form of a cyclone vented to a fabric sock filter to control particulate matter emissions. Therefore, the pre-control potential to emit must be calculated.

```
EFPM10, Controlled = 0.000585 lb-PM10/1,000 lb-product (PTO)
Throughput = 21,000,000 lb/year (PTO)
Control Efficiency = 99% (District Practice)

EFPM10, Controlled = EFPM10, Uncontrolled x (1 - Control Efficiency)
EFPM10, Uncontrolled = EFPM10, Controlled ÷ (1 - Control Efficiency)
= 0.000585 lb-PM10/1,000 lb-product ÷ (1 - 0.99)
= 0.0585 lb-PM10/1,000 lb-product

PEPM10, Uncontrolled = EFPM10, Uncontrolled x Throughput
= 0.0585 lb-PM10/1,000 lb-product x 21,000,000 lb/year
```

= 1,229 lb-PM₁₀/year

Since the pre-control potential to emit is less than the major source threshold of 140,000 lb-PM₁₀/year, CAM is not triggered for this unit.

I) S-892-26-1: RECYCLED RESIN PELLET (RRP) STORAGE SILO WITH BIN VENT FILTER

Permit unit '-26 has a PM₁₀ emission limit and an add-on control device in the form of a filtration vent to control particulate matter emissions. Therefore, the pre-control potential to emit must be calculated.

EF_{PM10, Controlled} = 0.0002 lb-PM₁₀/1,000 lb-product (PTO) Throughput = 28,800 lb/day (PTO) Control Efficiency = 99.95% (project S-1173424) Operating Time = 365 day/year (project S-1173424)

PE_{PM10}, Uncontrolled = EF_{PM10}, Uncontrolled x Throughput x Operating Time = 0.4 lb-PM₁₀/1,000 lb-product x 28,800 lb/day x 365 day/year = 4,205 lb-PM₁₀/year

Since the pre-control potential to emit is less than the major source threshold of 140,000 lb-PM₁₀/year, CAM is not triggered for this unit.

m) S-892-28-2: 260 BHP CUMMINS MODEL QSB6.7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

Permit unit '-28 does not have add-on control equipment. Therefore, CAM is not triggered.

I. 40 CFR Part 82, Subpart B – <u>Servicing of Motor Vehicle Air Conditioners</u>

Per §82.30(a) the purpose of 40 CFR Part 82, Subpart B is to implement section 609 of the Clean Air Act, as amended regarding the servicing of motor vehicle air conditioners (MVACs), and to implement section 608 of the Clean Air Act regarding certain servicing, maintenance, repair and disposal of air conditioners in MVACs and MVAC-like appliances (as that term is defined in 40 CFR 82.152).

Per §82.30(b) these regulations apply to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

40 CFR Part 82, Subpart B has been amended since the last Title V permit renewal was issued for this facility. However, compliance with the requirements of this rule will be ensured with the permit conditions on the facility-wide permit listed below:

Permit	Condition	Applicability
S-892-0-5	30	40 CFR Part 82, Subpart B

J. 40 CFR Part 82, Subpart F – Recycling and Emissions Reductions

Per §82.150(a) the purpose of 40 CFR Part 82, Subpart F is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair, and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and class II ODS in accordance with Title VI of the Clean Air Act.

Per §82.150(b) these regulations apply to any person servicing, maintaining, or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

40 CFR Part 82, Subpart F has been amended since the last Title V permit renewal was issued for this facility. However, compliance with the requirements of this rule will be ensured with the permit conditions on the facility-wide permit listed below:

Permit	Condition	Applicability
S-892-0-5	29	40 CFR Part 82, Subpart F

IX. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

The applicant is not proposing to use any model general permit templates.

B. Requirements not Addressed by Model General Permit Templates

The applicant has not proposed any new permit shields for non-model template requirements. Therefore, the following permit shields will be carried over onto renewed Title V permits:

Permit	Conditions	Applicability
S-892-0-5	41	District Rules 1100, 2010, 2031, 2040, 2070, 2080, 4101, 4201, 4601, 4623, 4682, 4801, 8021, 8031, 8041, 8051, 8061, and 8071
S-892-4-34	31	District Rule 4682

C. Obsolete Permit Shields From Existing Permit Requirements

There were no obsolete permit shields listed in the existing permit requirements.

X. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The purpose of the Title V permit renewal is to update the permit to ensure that any changes to regulations since the issuance of the initial Title V permit or most recent renewal of the Title V permit are incorporated as permit requirements.

Per the California Environmental Quality Act (CEQA) Statute §21080.24, and CEQA Guidelines §15281, the issuance, modification, amendment, or renewal of any permit by an air pollution control district or air quality management district pursuant to Title V is exempt from CEQA, unless the issuance, modification, amendment, or renewal authorizes a physical or operational change to a source or facility. There will be no physical or operational change to the source or facility

nor will the Title V permit renewal authorize a physical or operational change to the source or facility. Therefore, this project, a Title V permit renewal, is subject to a ministerial action that is exempt from CEQA.

XI. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

ATTACHMENTS

- A. Draft Renewed Title V Operating Permits
- B. Previous Title V Operating Permits
- C. Detailed Summary List of Facility Permits

ATTACHMENT A

Draft Renewed Title V Operating Permits

San Joaquin Valley Air Pollution Control District

EXPIRATION **FACILITY:** S-892-0-5

FACILITY-WIDE REQUIREMENTS

- 1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.0]
- The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0]
- {2287} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (8/18/11). [District Rules 2010, 3.0, 4.0 and 2020, 5.0, 6.0, 7.0] Federally Enforceable Through Title V Permit
- The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080 and 2520, 9.0] Federally Enforceable Through Title V Permit
- A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District Rule 2031, 2.0] Federally Enforceable Through Title V Permit
- Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040, 3.0] Federally Enforceable Through Title V Permit
- The operator shall maintain records of required monitoring that include, where appropriate: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- All Title V records required by conditions on this permit shall be readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. The results of each source test required by the conditions in this permit, shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.0] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Remail to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-229 S-982-0-5 : Mar 27 2023 2:52PM - BISHERC

- 11. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 12. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 13. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but, no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (8/15/19). [District Rules 2520, 9.0 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 14. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 15. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 16. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 17. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 18. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 19. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 22. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 23. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9,0] Rederally Enforceable Through Title V Permit

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2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 Location:

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- 24. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, 5.0] Federally Enforceable Through Title V Permit
- 25. No person shall: manufacture, blend, or repackage for use within the District; or supply, sell, market or offer for sale within the District; or solicit for application or apply within the District any architectural coating or colorant with a VOC content in excess of the corresponding limit specified in Table 1 or Table 2 of District Rule 4601 (4/16/20), after the specified effective dates in Table 1 or Table 2 of District Rule 4601. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
- 26. All architectural coating containers and containers of any VOC-containing materials subject to District Rule 4601 (4/16/20) shall be closed when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
- 27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in District Rule 4601, sections 6.1 and 6.3 (4/16/20). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
- 28. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.0 and 10.0] Federally Enforceable Through Title V Permit
- 29. {2311} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 30. {2312} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
- 31. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8021, 4.0, 5.0 and 8011 4.0 and 5.0] Federally Enforceable Through Title V Permit
- 32. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8031, 4.0, 5.0 and 8011, 4.0 and 5.0] Federally Enforceable Through Title V Permit
- 33. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8041, 4.0, 5.0 and 8011, 4.0, 5.0] Federally Enforceable Through Title V Permit
- 34. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8051, 4.0, 5.0 and 8011, 4.0, 5.0] Federally Enforceable Through Title V Permit
- 35. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8061, 4.0, 5.0 and 8011, 4.0, and 5.0] Federally Enforceable Through Title V Permit
- 36. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (8/19/04) or Rule 8011 (9/16/04). [District Rules 8071, 4.0 and 5.0 and 8011, 4.0 and 5.0] Federally Enforceable Through Title V Permit

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- 37. {2319} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
- 38. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 39. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.0] Federally Enforceable Through Title V Permit
- 40. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 41. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4201 (12/17/92); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (12/17/09); 4623 (5/19/05); 4682 sections 5.1 and 5.2 (9/20/07); 4801 (12/17/92); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (8/19/04). A permit shield is granted from these requirements. [District Rule 2520, 13.0] Federally Enforceable Through Title V Permit
- 42. Records of dust collector maintenance, inspections, and repair 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, 9.0] Federally Enforceable Through Title V Permit
- 43. 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, 9.0] Federally Enforceable Through Title V Permit
- 44. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702, 6.0 and 17 CCR 93115] Federally Enforceable Through Title V Permit
- 45. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin July 15 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 46. The facility shall submit to the proper authority a Risk Management Plan, and comply with all the requirements of Program 1, 2, or 3. [40 CFR Part 68] Federally Enforceable Through Title V Permit
- 47. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102, 4.0]

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Facility Name: PACTIV LLC \ \ Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-229

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-1-12

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

VIRGIN RESIN UNLOADING AND STORAGE INCLUDING RAIL CAR UNLOADING FILTER/RECEIVER WITH 75 HP EXHAUST BLOWER, 60 HP FEED BLOWER, FOUR STORAGE SILOS, AND ONE FABRIC DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

- Virgin resin silo vents shall vent only to fabric dust collector. [District Rule 2201] Federally Enforceable Through Title V Permit
- Materials collected in fabric dust collector shall be recycled into virgin resin silos or disposed of in a manner preventing emissions to the atmosphere. [District Rule 4102, 4.1]
- 3. The fabric dust collector shall be maintained in proper working order. [District Rule 2201] Federally Enforceable Through Title V Permit
- 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
- 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. [District Rules 2520, 9.0 and 4101, 6.0] Federally Enforceable Through Title V Permit
- 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

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Facility Name: PACTIV LLC 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297

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Location:

PERMIT UNIT: S-892-2-25

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

PERMIT UNIT REQUIREMENTS

- 1. Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit numbers S-892-2 and S-892-5 shall not exceed 302,400 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Particulate matter (PM10) emissions shall not exceed 0.008 lbm-PM10 per 1,000 lbm virgin resin. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. Operator shall maintain records of monthly amount of weight virgin resin processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. 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
- 7. Visible emissions from the 30 hp vacuum transfer blower exhaust 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
- 8. 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

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Facility Name: PACTIV LLC Location: 2024 NORRIS

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297 S-892-2-25 : Mar 14 2023 4:43PM -- BISHERC

PERMIT UNIT: S-892-4-34

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

THERMOPLASTIC RESIN FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS. SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE IN 11 FLUFF STORAGE SILOS, FOUR RECLAIM EXTRUDER LINES, VOC VAPOR COLLECTION SYSTEM, AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)

PERMIT UNIT REQUIREMENTS

- Only thermoplastic resins approved by the APCO shall be used. [District Rule 2201] Federally Enforceable Through 1. Title V Permit
- Storage silos shall be maintained gas tight. [District Rule 2201] Federally Enforceable Through Title V Permit 2.
- 3. Trim grinders units and reclaim granulator units shall be vented only to the fluff feed silos with fabric collectors. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operation shall be equipped with no more than 11 fluff storage silos each with separate fabric collectors, 6 of which have live bottom bins, and all venting to the RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
- The VOC vapor collection system shall serve 4 fluff feed silo fabric collector exhausts, 4 extruder vents including vapor mix box #MB-2 and vapor booster fan exhausting to mix box #MB-1. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- Operation shall include no more than 4 reclaim extruder lines with underwater pelletizer systems, air dryers, 4 pelletizer blowers, and one reclaim extruder line with a waterslide pelletizer and blower. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operation shall include VOC vapor collection system exhausting to RTO serving 11 fluff storage silos including mix box #MB-1. [District Rule 2201] Federally Enforceable Through Title V Permit
- RTO shall be equipped with 3 heat exchanger beds filled with ceramic media, combustion chamber, two 8 MMBtu/hr burners, combustion air fan and induced draft exhaust fan. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- RTO beds smokeless burnout system shall include burnout fan and ducting from outlet side of heat exchanger beds to combustion chamber. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Fluff transfer and reclaim resin storage operation shall not operate or produce VOC emissions during RTO burnout process. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. RTO burners shall be fired exclusively with PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Fuel gas sulfur content shall not exceed 0.25 grain per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Fuel gas flowrate to RTO burners shall not exceed 384,000 set per day. [District Rule 2201] Federally Enforceable Through Title V Permit

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- 14. RTO combustion chamber temperature shall be maintained at no less than 1350 deg. F. [District Rule 4682 and 40 CFR 64] Federally Enforceable Through Title V Permit
- 15. The RTO shall be equipped with a continuous temperature monitoring and recording device. During operation, the temperature shall be recorded at least once every fifteen minutes. [40 CFR 64]
- 16. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 17. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 18. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 19. The blowing agent vapor residence time in RTO firebox shall be maintained at no less than 1.0 second. [District Rule 4682] Federally Enforceable Through Title V Permit
- 20. The blowing agent vapor collection and incineration efficiency shall be maintained at no less than 95% by weight. [District Rule 4682] Federally Enforceable Through Title V Permit
- 21. Ambient air flow into vapor control system shall be regulated at mix boxes and shall not exceed amount required to maintain vapor concentration below lower explosive limit (LEL). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain accurate records of vapor control system operation conditions (RTO operating temperature, fuel gas flowrate, etc.). [District Rule 4682] Federally Enforceable Through Title V Permit
- 23. Records required by conditions on this permit shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Particulate matter (PM10) emission rate at RTO exhaust shall not exceed 14.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. Maximum emission rate of SOx (as SO2) shall not exceed 0.2 pound per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 26. Maximum emission rate of volatile organic compounds (VOC) shall not exceed 184.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 27. Maximum emission rate of oxides of nitrogen (NOx) shall not exceed 53.8 pounds per day (as NO2). [District Rule 2201] Federally Enforceable Through Title V Permit
- 28. Maximum emission rate of carbon monoxide (CO) shall not exceed 13.4 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 29. The lifetime emissions from total material input (TMI) shall not exceed 2.4 lb-VOC/100 lb-TMI (calculated on a monthly average). [District Rule 4682] Federally Enforceable Through Title V Permit
- 30. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation: LE (lb-VOC/100 lb TMI) = 100 x [BAI - (RECOLL*EFF)]/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 Rule 4682] Federally Enforceable Through Title V Permit
- 31. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation: RECOLL = (SCRAPBA - 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 Rule 4682] Federally Enforceable Through Title V Permit

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2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 Location:

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- 32. District witnessed source testing to demonstrate compliance with VOC and sulfur compound emission limits and RTO control efficiency shall be conducted by independent testing laboratory annually 60 days prior to permit anniversary date. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 33. Source testing to demonstrate compliance with District Rule 4682 shall be performed using EPA Methods 25 and 25A for gaseous organics at inlet/outlet of RTO. [District Rule 4682] Federally Enforceable Through Title V Permit
- 34. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4682. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
- 35. RTO outlet shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken. [District Rule 2520] Federally Enforceable Through Title V Permit
- 36. Records of control system maintenance, inspections, and repair 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] Federally Enforceable Through Title V Permit
- 37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 4201, section 3.0 (12/17/92) and 4682, sections 5.1 and 5.2 (12/15/11). [District Rule 2520] Federally Enforceable Through Title V Permit

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Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308 S-892-4-34 : Mar 14 2023 4:43PM -- BISHERC

PERMIT UNIT: S-892-5-26

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

RECLAIMED POLYSTYRENE PELLET (RPP) SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 10 RPP SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RPP USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

PERMIT UNIT REQUIREMENTS

- 1. Reclaimed Polystyrene Pellet (RPP) conveying system shall be equipped with no more than 3 static baghouses. [District Rule 2201] Federally Enforceable Through Title V Permit
- Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit numbers S-892-2 and S-892-5 shall 2. not exceed 302,400 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- Particulate matter (PM10) emissions shall not exceed 0.008 lbm-PM10 per 1,000 lbm-RPP. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operator shall maintain records of monthly amount of weight RPP processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
- Visible emissions from the 30 hp vacuum transfer blower exhaust 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
- 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
- Dust collectors shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken, such as baghouse maintenance, cleaning, or replacement of bags as needed [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit

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10. 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

> These terms and conditions t√of the Facility-wide Permit to Operate.

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297 S-892-5-26 : Mar 14 2023 4:43PM -- BISHERC

PERMIT UNIT: S-892-6-5

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #1 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM

RELIEF VALVE

PERMIT UNIT REQUIREMENTS

Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.0 and 4682, 5.0] Federally Enforceable Through Title V Permit

> These terms and conditions e Facility-wide Permit to Operate.

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297 S-892-6-5 : Mar 14 2023 4-43PM - BISHERC

PERMIT UNIT: S-892-7-5

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #2 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM

RELIEF VALVE

PERMIT UNIT REQUIREMENTS

Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.0 and 4682, 5.0] Federally Enforceable Through Title V Permit

> These terms and conditions e Facility-wide Permit to Operate.

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297 S-892-7-5: Mar 14 2023 4-43PM - BISHERC

PERMIT UNIT: S-892-8-5

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #3 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE.

PERMIT UNIT REQUIREMENTS

Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.0 and 4682, 5.0] Federally Enforceable Through Title V Permit

> These terms and conditions e Facility-wide Permit to Operate.

Facility Name: PACTIV LLC Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297 S-892-8-5 : Mar 14 2023 4-43PM - BISHERC

PERMIT UNIT: S-892-10-38

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

THERMOPLASTIC RESIN FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

PERMIT UNIT REQUIREMENTS

EXPIRATION DA

- 1. Only thermoplastic resins approved by the APCO shall be used. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. When using polystyrene resin, blowing agent will consist of isopentane, 10% or greater CO2 by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.2.2 on a monthly basis. When using thermoplastic resin other than polystyrene, methyl formate and/or CO2 will not be required but operations will still comply with District 4682, Section 5.3.1, on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- 4. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- 5. Total Materials Input (TMI) shall include the total material (including all virgin and recycled thermoplastic resins, 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
- 6. Total VOC emissions from thermoplastic resin 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
- 7. Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. 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
- 9. Total VOC emissions from thermoplastic resin 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
- 10. 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
- 11. Weight of VOC blowing agent retained in finished product shall be determined using EPA approved test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 12. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297

392-10-38 : Mar 14 2023 4:43PM -- BISHER0

- 13. VOC emissions from thermoplastic resin foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: lbs-VOC emitted per ton of TMI = (2000)[BAI (PFP*BAR) BAD+WH]/TMI where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of thermoplastic resin 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
- 14. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation: LE (lb-VOC/100 lb TMI) = 100 x [BAI (RECOLL*EFF)]/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 all virgin and recycled thermoplastic resins, 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
- 15. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation: RECOLL = (SCRAPBA 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 all reclaimed thermoplastic resin pellets) made from thermoformer and extruder scrap from the extruders. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- 16. VOC content of thermoformed products and reclaimed thermoplastic resin pellets (RPP) shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Based on 2002 source test, RTO capture efficiency for calculation 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
- 18. 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 thermoplastic resin 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 for a minimum of 5 years. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
- 19. 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
- 20. 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
- 21. 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
- 22. Average daily amount of material input to extruders shall be calculated as follows: (actual daily hours) x ((total thermoplastic resin foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. 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

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

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-S-892-10-38: Mar 14 2023 4:43PM - BISHERC

PERMIT UNIT: S-892-12-5

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

REPROCESSED POLYSTYRENE PELLET (RPP) BOX DUMPER OPERATION (24 TOTAL HP)

PERMIT UNIT REQUIREMENTS

- 1. Box dumper system shall be equipped with one 20 hp Sutorbilt model 6MVF blower. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Box dumper system shall be equipped with no more than two 75 cubic foot bins, each with a 1 hp hydraulic dumper and a 1 hp rotary airlock. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. Box dumper operation shall not process more than 60,000 lbm recycled polystyrene pellets (RPP) per day and 7,200,000 lbm RPP per year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Particulate matter (PM10) emissions shall not exceed 0.15 lb per 1,000 lbm-RPP processed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Operator shall maintain daily records of process weight rate and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. 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 and 4101, 6.0] Federally Enforceable Through Title V Permit

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

Facility Name: PACTIV LLC Location: PACTIV LLC 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297

S-892-12-5 : Mar 14 2023 4:43PM -- BISHERC

PERMIT UNIT: S-892-17-29

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS. HEAT

TUNNELS AND TRIM PRESSES

PERMIT UNIT REQUIREMENTS

- Only thermoplastic resins approved by the APCO shall be used. [District Rule 2201] Federally Enforceable Through Title V Permit
- Total Materials Input (TMI) shall include the total material (including virgin and recycled thermoplastic resin, 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
- Total VOC emissions from thermoplastic resin 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
- At the end of each calendar month, the permittee shall record the following information for that calendar month: pounds of VOC blowing agent introduced into the process; pounds of thermoplastic resin foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
- 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
- Average daily amount of material input to extruders shall be calculated as follows: (actual daily hours) x ((total thermoplastic resin foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
- 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
- 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
- Operator shall maintain records of mass balance calculations to verify compliance with VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rule 1070, 2201, and 4682] 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.

2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 Location:

S-892-17-29 : Mar 14 2023 4:43PM -- BISHERO

Facility Name: PACTIV LLC

- 10. VOC emissions from thermoplastic resin foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: lbs-VOC emitted per ton of TMI = (2000)[BAI -(PFP*BAR) - BAD+WH]/TMI where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of thermoplastic resin 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
- 11. 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 Rules 1070] Federally Enforceable Through Title V Permit

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

Facility Name: PACTIV LLC 2024 NORRIS RD, BAKERSFIELD, CA 93308-

Location: S-892-17-29 : Mar 14 2023 4:43PM -- BISHERC

PERMIT UNIT: S-892-22-3

EQUIPMENT DESCRIPTION:

18,000 GALLON METHYL FORMATE PRESSURE VESSEL STORAGE TANK

PERMIT UNIT REQUIREMENTS

This pressure vessel shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 2201 and 4623, 4.0] Federally Enforceable Through Title V Permit

> These terms and conditions he Facility-wide Permit to Operate.

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 S-892-22-3 : Mar 14 2023 4:43PM -- BISHERC

PERMIT UNIT: S-892-23-8

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

- The bin vent filter shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. 1. 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
- 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
- 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
- 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
- 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
- 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
- The bin vent filters shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
- 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
- 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
- 10. A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACTIV LLC

2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 Location:

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- 12. 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
- 13. 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

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

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-S-892-23-8: Mar 14 2023 4:43PM -- BISHERC

PERMIT UNIT: S-892-24-6

EXPIRATION DAT

EQUIPMENT DESCRIPTION:

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)**

PERMIT UNIT REQUIREMENTS

- 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
- 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
- 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
- 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
- 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
- The fabric filter shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
- The fabric filters cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 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
- A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. 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
- 11. Operator shall maintain records of monthly amount of polystyrene/polypropylene/polyethylene resin transferred and total hours of operation per month. [District Rule 220] 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.

Facility Name: PACTIV LLC

2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 Location: S-892-24-6: Mar 14 2023 4:44PM -- BISHERC

- 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 polystyrene/polypropylene/polyethylene resin transferred in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit

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

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-S-892-24-6 : Mar 14 2023 4:44PM -- BISHERC

PERMIT UNIT: S-892-25-6

EQUIPMENT DESCRIPTION:

OFFLINE POLYSTYRENE, POLYPROPYLENE AND POLYETHYLENE SCRAP GRINDING OPERATION CONSISTING OF TWO GRINDERS EACH SERVED BY CYCLONE VENTED TO A FABRIC SOCK FILTER

PERMIT UNIT REQUIREMENTS

- 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
- 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
- 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
- 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
- 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
- The sock filters shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. The sock filters cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 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
- A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. 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
- 11. 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
- 12. Operator shall maintain records of daily scheduled hours of operation. [District Rule 2201] 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.

Facility Name: PACTIV LLC

2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 Location:

S-892-25-6 : Mar 14 2023 4:44PM -- BISHERC

13. 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

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

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297 S-892-25-6 : Mar 14 2023 4:44PM -- BISHERC

PERMIT UNIT: S-892-26-1

EQUIPMENT DESCRIPTION:

RECYCLED RESIN PELLET (RRP) STORAGE SILO WITH BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

- 1. Only thermoplastic resins approved by the APCO shall be used. [District Rule 2201] Federally Enforceable Through Title V Permit
- Daily throughput of recycled resin pellets (RRP) shall not exceed 28,800 lbs/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.0002 lb-PM10/1,000 lb RRP throughput. [District Rule 2201] Federally Enforceable Through Title V Permit
- 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
- 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. [District Rules 2520, 9.0 and 4101, 6.0] Federally Enforceable Through Title V Permit
- Dust collectors shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken, such as baghouse maintenance, cleaning, or replacement of bags as needed [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 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
- Operator shall maintain records of monthly amount by weight of RRP processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total thermoplastic foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions acility-wide Permit to Operate.

Facility Name: PACTIV LLC Location:

2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 S-892-26-1 : Mar 14 2023 4:44PM -- BISHERC

PERMIT UNIT: S-892-28-2

EQUIPMENT DESCRIPTION:

260 BHP CUMMINS MODEL QSB6.7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

PERMIT UNIT REQUIREMENTS

- 1. The exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- Particulate matter emissions shall not exceed 0.1 grains/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] Federally Enforceable Through Title V Permit
- No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
- Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801; 17 CCR 93115; 40 CFR 60.4207(b)] Federally Enforceable Through Title V Permit
- This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
- An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
- Emissions from this IC engine shall not exceed any of the following limits: 2.9 g-NOx/bhp-hr, 2.6 g- CO/bhp-hr, 0.1 g-VOC/bhp-hr, or 0.15 g-PM10/bhp-hr. [District Rules 2201 and 4102; 17 CCR 93115; 40 CFR 60.4205(c) and 60.4211(c)] Federally Enforceable Through Title V Permit
- This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702; 17 CCR 93115; 40 CFR Part 60.4211(f)] Federally Enforceable Through Title V Permit
- The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

10. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702; 40 CFR 60.4211(a)] Federally Enforceable Through Title V Permit

> the Facility-wide Permit to Operate. These terms and conditions

Facility Name: PACTIV LLC Location:

2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 S-892-28-2 : Mar 14 2023 4:44PM -- BISHERC

ATTACHMENT B

Previous Title V Operating Permits

FACILITY: S-892-0-4 **EXPIRATION DATE: 01/31/2022**

FACILITY-WIDE REQUIREMENTS

- 1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.0 and Kern County Rule 111] Federally Enforceable Through Title V Permit
- The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and Kern County Rule 111] Federally Enforceable Through Title V Permit
- The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (8/18/11). [District Rules 2010, 3.0, 4.0 and 2020, 5.0, 6.0, 7.0] Federally Enforceable Through Title V Permit
- The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080 and 2520, 9.0] Federally Enforceable Through Title V Permit
- A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District Rule 2031, 2.0] Federally Enforceable Through Title V Permit
- Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040, 3.0] Federally Enforceable Through Title V Permit
- The operator shall maintain records of required monitoring that include, where appropriate: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- All Title V records required by conditions on this permit shall be readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. The results of each source test required by the conditions in this permit, shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.0] Federally Enforceable Through Title V Permit

- 11. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 12. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 13. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but, no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.0 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 14. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 15. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 16. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 17. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 18. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 19. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 22. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 23. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit

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- 24. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, 5.0 and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
- 25. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.0] Federally Enforceable Through Title V Permit
- 26. All VOC-containing materials for architectural coatings subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.0] Federally Enforceable Through Title V Permit
- 27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.0] Federally Enforceable Through Title V Permit
- 28. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.0 and 10.0] Federally Enforceable Through Title V Permit
- 29. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 30. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
- 31. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8021, 4.0, 5.0 and 8011 4.0 and 5.0] Federally Enforceable Through Title V Permit
- 32. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8031, 4.0, 5.0 and 8011, 4.0 and 5.0] Federally Enforceable Through Title V Permit
- 33. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8041, 4.0, 5.0 and 8011, 4.0, 5.0] Federally Enforceable Through Title V Permit
- 34. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8051, 4.0, 5.0 and 8011, 4.0, 5.0] Federally Enforceable Through Title V Permit
- 35. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8061, 4.0, 5.0 and 8011, 4.0, and 5.0] Federally Enforceable Through Title V Permit
- 36. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8071, 4.0 and 5.0 and 8011, 4.0 and 5.0] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

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- 37. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
- 38. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 39. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.0] Federally Enforceable Through Title V
- 40. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 41. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Kern County Rules 111, 407 and 401. A permit shield is granted from these requirements. [District Rule 2520, 13.0] Federally Enforceable Through Title V Permit
- 42. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92): 2040 (12/17/92): 2070, section 7.0 (12/17/92): 2080 (12/17/92): 2031 (12/17/92): 2040 (12/17/92): 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4201 (12/17/92); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (12/17/09); 4623 (5/19/05); 4682 sections 5.1 and 5.2 (9/20/07); 4801 (12/17/92); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (8/19/04). A permit shield is granted from these requirements. [District Rule 2520, 13.0] Federally Enforceable Through Title V Permit
- 43. Records of dust collector maintenance, inspections, and repair 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, 9.0] Federally Enforceable Through Title V Permit
- 44. 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, 9.0] Federally Enforceable Through Title V Permit
- 45. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702, 6.0 and 17 CCR 93115] Federally Enforceable Through Title V Permit
- 46. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin July 15 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 47. The facility shall submit to the proper authority a Risk Management Plan, and comply with all the requirements of Program 1, 2, or 3. [40 CFR Part 68] Federally Enforceable Through Title V Permit
- 48. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102, 4.0]

Facility Name: PACTIV LLC

2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 S-892-0-4 : Mar 14 2023 9:55AM - BISHERO

PERMIT UNIT: S-892-1-11 **EXPIRATION DATE:** 01/31/2022

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

VIRGIN RESIN UNLOADING AND STORAGE INCLUDING RAIL CAR UNLOADING FILTER/RECEIVER WITH 75 HP EXHAUST BLOWER, 60 HP FEED BLOWER, FOUR STORAGE SILOS, AND ONE FABRIC DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

- 1. Virgin resin silo vents shall vent only to fabric dust collector. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Materials collected in fabric dust collector shall be recycled into virgin resin silos or disposed of in a manner preventing emissions to the atmosphere. [District Rule 4102, 4.1]
- 3. The fabric dust collector shall be maintained in proper working order. [District Rule 2201] 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
- 5. 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. [District Rules 2520, 9.0 and 4101, 6.0] 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

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

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297 S-892-1-11: Mar 14 2023 9:55AM -- BISHERC

PERMIT UNIT: S-892-2-24 **EXPIRATION DATE: 01/31/2022**

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE. TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

PERMIT UNIT REQUIREMENTS

- Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit numbers S-892-2 and S-892-5 shall 1. not exceed 302,400 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- Particulate matter (PM10) emissions shall not exceed 0.008 lbm-PM10 per 1,000 lbm virgin resin. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operator shall maintain records of monthly amount of weight virgin resin processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
- 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
- Visible emissions from the 30 hp vacuum transfer blower exhaust 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
- 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

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

Facility Name: PACTIV LLC 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 S-892-2-24 : Mar 14 2023 9:55AM -- BISHERC

Location:

PERMIT UNIT: S-892-4-32 **EXPIRATION DATE: 01/31/2022**

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

THERMOPLASTIC RESIN FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS. SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE IN 11 FLUFF STORAGE SILOS, FOUR RECLAIM EXTRUDER LINES, VOC VAPOR COLLECTION SYSTEM, AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)

PERMIT UNIT REQUIREMENTS

- Only thermoplastic resins approved by the APCO shall be used. [District Rule 2201] Federally Enforceable Through 1. Title V Permit
- Storage silos shall be maintained gas tight. [District Rule 2201] Federally Enforceable Through Title V Permit 2.
- 3. Trim grinders units and reclaim granulator units shall be vented only to the fluff feed silos with fabric collectors. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operation shall be equipped with no more than 11 fluff storage silos each with separate fabric collectors, 6 of which have live bottom bins, and all venting to the RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
- The VOC vapor collection system shall serve 4 fluff feed silo fabric collector exhausts, 4 extruder vents including vapor mix box #MB-2 and vapor booster fan exhausting to mix box #MB-1. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- Operation shall include no more than 4 reclaim extruder lines with underwater pelletizer systems, air dryers, 4 pelletizer blowers, and one reclaim extruder line with a waterslide pelletizer and blower. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operation shall include VOC vapor collection system exhausting to RTO serving 11 fluff storage silos including mix box #MB-1. [District Rule 2201] Federally Enforceable Through Title V Permit
- RTO shall be equipped with 3 heat exchanger beds filled with ceramic media, combustion chamber, two 8 MMBtu/hr burners, combustion air fan and induced draft exhaust fan. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- RTO beds smokeless burnout system shall include burnout fan and ducting from outlet side of heat exchanger beds to combustion chamber. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Fluff transfer and reclaim resin storage operation shall not operate or produce VOC emissions during RTO burnout process. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. RTO burners shall be fired exclusively with PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Fuel gas sulfur content shall not exceed 0.25 grain per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Fuel gas flowrate to RTO burners shall not exceed 384,000 scf per day. [District Rule 2201] 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.

Facility Name: PACTIV LLC 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 Location:

LOCATION: 2024 NORRIS S-892-4-32 : Mar 14 2023 9:55AM -- BISHERC

- 14. RTO combustion chamber temperature shall be maintained at no less than 1350 deg. F. [District Rule 4682 and 40 CFR 64] Federally Enforceable Through Title V Permit
- 15. The RTO shall be equipped with a continuous temperature monitoring and recording device. During operation, the temperature shall be recorded at least once every fifteen minutes. [40 CFR 64]
- 16. The blowing agent vapor residence time in RTO firebox shall be maintained at no less than 1.0 second. [District Rule 4682] Federally Enforceable Through Title V Permit
- 17. The blowing agent vapor collection and incineration efficiency shall be maintained at no less than 95% by weight. [District Rule 4682] Federally Enforceable Through Title V Permit
- 18. Ambient air flow into vapor control system shall be regulated at mix boxes and shall not exceed amount required to maintain vapor concentration below lower explosive limit (LEL). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- 19. Permittee shall maintain accurate records of vapor control system operation conditions (RTO operating temperature, fuel gas flowrate, etc.). [District Rule 4682] Federally Enforceable Through Title V Permit
- 20. Records required by conditions on this permit shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- 21. Particulate matter (PM10) emission rate at RTO exhaust shall not exceed 14.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Maximum emission rate of SOx (as SO2) shall not exceed 0.2 pound per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. Maximum emission rate of volatile organic compounds (VOC) shall not exceed 184.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Maximum emission rate of oxides of nitrogen (NOx) shall not exceed 53.8 pounds per day (as NO2). [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. Maximum emission rate of carbon monoxide (CO) shall not exceed 13.4 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 26. The lifetime emissions from total material input (TMI) shall not exceed 2.4 lb-VOC/100 lb-TMI (calculated on a monthly average). [District Rule 4682] Federally Enforceable Through Title V Permit
- 27. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation: LE (lb-VOC/100 lb TMI) = 100 x [BAI (RECOLL*EFF)]/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 Rule 4682] Federally Enforceable Through Title V Permit
- 28. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation: RECOLL = (SCRAPBA 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 Rule 4682] Federally Enforceable Through Title V Permit
- 29. District witnessed source testing to demonstrate compliance with VOC and sulfur compound emission limits and RTO control efficiency shall be conducted by independent testing laboratory annually 60 days prior to permit anniversary date. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 30. Source testing to demonstrate compliance with District Rule 4682 shall be performed using EPA Methods 25 and 25A for gaseous organics at inlet/outlet of RTO. [District Rule 4682] Federally Enforceable Through Title V Permit

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- 31. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4682. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
- 32. RTO outlet shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken. [District Rule 2520] Federally Enforceable Through Title V Permit
- 33. Records of control system maintenance, inspections, and repair 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] Federally Enforceable Through Title V Permit
- 34. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 4201, section 3.0 (12/17/92) and 4682, sections 5.1 and 5.2 (6/16/94). [District Rule 2520] Federally Enforceable Through Title V Permit

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PERMIT UNIT: S-892-5-25 **EXPIRATION DATE: 01/31/2022**

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

RECLAIMED POLYSTYRENE PELLET (RPP) SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 10 RPP SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RPP USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

PERMIT UNIT REQUIREMENTS

- Reclaimed Polystyrene Pellet (RPP) conveying system shall be equipped with no more than 3 static baghouses. 1. [District Rule 2201] Federally Enforceable Through Title V Permit
- Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit numbers S-892-2 and S-892-5 shall 2. not exceed 302,400 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- Particulate matter (PM10) emissions shall not exceed 0.008 lbm-PM10 per 1,000 lbm-RPP. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operator shall maintain records of monthly amount of weight RPP processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
- Visible emissions from the 30 hp vacuum transfer blower exhaust 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
- 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
- Dust collectors shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken, such as bughouse maintenance, cleaning, or replacement of bags as needed [District Rule 2520, 9.0] 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.

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10. 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

PERMIT UNIT: S-892-6-4 **EXPIRATION DATE:** 01/31/2022

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #1 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE

PERMIT UNIT REQUIREMENTS

1. Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.0 and 4682, 5.0] Federally Enforceable Through Title V Permit

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

Facility Name: PACTIV LLC Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297 S-892-6-4: Mar 14 2023 9:55AM – BISHERC

EXPIRATION DATE: 01/31/2022 **PERMIT UNIT:** S-892-7-4

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #2 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM **RELIEF VALVE**

PERMIT UNIT REQUIREMENTS

Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.0 and 4682, 5.0] Federally Enforceable Through Title V Permit

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

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297 S-892-7-4: Mar 14 2023 9:55AM – BISHERC

PERMIT UNIT: S-892-8-4 **EXPIRATION DATE:** 01/31/2022

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #3 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE.

PERMIT UNIT REQUIREMENTS

1. Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.0 and 4682, 5.0] Federally Enforceable Through Title V Permit

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

Facility Name: PACTIV LLC Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297 S-892-8-4: Mar 14 2023 9:55AM – BISHERC

PERMIT UNIT: S-892-10-37 **EXPIRATION DATE:** 01/31/2022

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

THERMOPLASTIC RESIN FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

PERMIT UNIT REQUIREMENTS

- Only thermoplastic resins approved by the APCO shall be used. [District Rule 2201] Federally Enforceable Through 1. Title V Permit
- 2. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. When using polystyrene resin, blowing agent will consist of isopentane, 10% or greater CO2 by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.2.2 on a monthly basis. When using thermoplastic resin other than polystyrene, methyl formate and/or CO2 will not be required but operations will still comply with District 4682, Section 5.3.1, on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- Total Materials Input (TMI) shall include the total material (including all virgin and recycled thermoplastic resins, 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
- Total VOC emissions from thermoplastic resin 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
- Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. 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
- Total VOC emissions from thermoplastic resin 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
- 10. 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
- 11. Weight of VOC blowing agent retained in finished product shall be determined using EPA approved test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
- 12. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACTIV LLC 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 Location:

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- 13. VOC emissions from thermoplastic resin foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: lbs-VOC emitted per ton of TMI = (2000)[BAI -(PFP*BAR) - BAD+WH]/TMI where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of thermoplastic resin 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
- 14. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation: LE (lb-VOC/100 lb TMI) = 100 x [BAI - (RECOLL*EFF)]/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 all virgin and recycled thermoplastic resins, 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
- 15. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation: RECOLL = (SCRAPBA - 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 all reclaimed thermoplastic resin pellets) made from thermoformer and extruder scrap from the extruders. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
- 16. VOC content of thermoformed products and reclaimed thermoplastic resin pellets (RPP) shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Based on 2002 source test, RTO capture efficiency for calculation 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
- 18. 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 thermoplastic resin 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 for a minimum of 5 years. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
- 19. 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
- 20. 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
- 21. 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
- 22. Average daily amount of material input to extruders shall be calculated as follows: (actual daily hours) x ((total thermoplastic resin foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. 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

PERMIT UNIT: S-892-12-4 **EXPIRATION DATE:** 01/31/2022

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

REPROCESSED POLYSTYRENE PELLET (RPP) BOX DUMPER OPERATION (24 TOTAL HP)

PERMIT UNIT REQUIREMENTS

- Box dumper system shall be equipped with one 20 hp Sutorbilt model 6MVF blower. [District Rule 2201] Federally Enforceable Through Title V Permit
- Box dumper system shall be equipped with no more than two 75 cubic foot bins, each with a 1 hp hydraulic dumper and a 1 hp rotary airlock. [District Rule 2201] Federally Enforceable Through Title V Permit
- Box dumper operation shall not process more than 60,000 lbm recycled polystyrene pellets (RPP) per day and 7,200,000 lbm RPP per year. [District Rule 2201] Federally Enforceable Through Title V Permit
- Particulate matter (PM10) emissions shall not exceed 0.15 lb per 1,000 lbm-RPP processed. [District Rule 2201] Federally Enforceable Through Title V Permit
- Operator shall maintain daily records of process weight rate and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- 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 and 4101, 6.0] Federally Enforceable Through Title V Permit

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

Facility Name: PACTIV LLC 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 S-892-12-4 : Mar 14 2023 9:55AM -- BISHERC

Location:

PERMIT UNIT: S-892-17-28 **EXPIRATION DATE:** 01/31/2022

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS, HEAT

TUNNELS AND TRIM PRESSES

PERMIT UNIT REQUIREMENTS

- 1. Only thermoplastic resins approved by the APCO shall be used. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Total Materials Input (TMI) shall include the total material (including virgin and recycled thermoplastic resin, 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
- 3. Total VOC emissions from thermoplastic resin 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
- 4. At the end of each calendar month, the permittee shall record the following information for that calendar month: pounds of VOC blowing agent introduced into the process; pounds of thermoplastic resin foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
- 5. 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
- 6. Average daily amount of material input to extruders shall be calculated as follows: (actual daily hours) x ((total thermoplastic resin foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. 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
- 8. 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
- 9. Operator shall maintain records of mass balance calculations to verify compliance with VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rule 1070, 2201, and 4682] 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.

Facility Name: PACTIV LLC Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297

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- 10. VOC emissions from thermoplastic resin foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: lbs-VOC emitted per ton of TMI = (2000)[BAI -(PFP*BAR) - BAD+WH]/TMI where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of thermoplastic resin 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
- 11. 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 Rules 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-892-22-2 **EXPIRATION DATE:** 01/31/2022

EQUIPMENT DESCRIPTION:

18,000 GALLON METHYL FORMATE PRESSURE VESSEL STORAGE TANK

PERMIT UNIT REQUIREMENTS

This pressure vessel shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 2201 and 4623, 4.0] Federally Enforceable Through Title V Permit

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

Facility Name: PACTIV LLC

Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297 S-892-22-2: Mar 14 2023 9:56AM -- BISHERC

PERMIT UNIT: S-892-23-7 **EXPIRATION DATE:** 01/31/2022

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

- 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 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
- 3. 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
- 4. 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
- 5. 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
- 6. 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
- 7. The bin vent filters shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. 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
- 9. 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
- 10. A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACTIV LLC Location: 2024 NORRIS RD,BAKERSFIELD, CA 93308-2297

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- 12. 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
- 13. 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

PERMIT UNIT: S-892-24-5 **EXPIRATION DATE:** 01/31/2022

EQUIPMENT DESCRIPTION:

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)**

PERMIT UNIT REQUIREMENTS

- 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
- 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
- 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
- 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
- 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
- The fabric filter shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
- The fabric filters cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 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
- A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. 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
- 11. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PACTIV LLC 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 Location: S-892-24-5 : Mar 14 2023 9:56AM -- BISHERC

- 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 polystyrene/polypropylene/polyethylene resin transferred in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit

EXPIRATION DATE: 01/31/2022 **PERMIT UNIT:** S-892-25-5

EQUIPMENT DESCRIPTION:

OFFLINE POLYSTYRENE, POLYPROPYLENE AND POLYETHYLENE SCRAP GRINDING OPERATION CONSISTING OF TWO GRINDERS EACH SERVED BY CYCLONE VENTED TO A FABRIC SOCK FILTER

PERMIT UNIT REQUIREMENTS

- 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
- 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
- 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
- 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
- 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
- The sock filters shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. The sock filters cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 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
- A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. 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
- 11. 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
- 12. Operator shall maintain records of daily scheduled hours of operation. [District Rule 2201] 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.

Facility Name: PACTIV LLC 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 Location:

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13. 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

PERMIT UNIT: S-892-26-0 **EXPIRATION DATE:** 01/31/2022

EQUIPMENT DESCRIPTION:

RECYCLED RESIN PELLET (RRP) STORAGE SILO WITH BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

- 1. Only thermoplastic resins approved by the APCO shall be used. [District Rule 2201] Federally Enforceable Through Title V Permit
- Daily throughput of recycled resin pellets (RRP) shall not exceed 28,800 lbs/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.0002 lb-PM10/1,000 lb RRP throughput. [District Rule 2201] Federally Enforceable Through Title V Permit
- 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
- 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. [District Rules 2520, 9.0 and 4101, 6.0] Federally Enforceable Through Title V Permit
- Dust collectors shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken, such as bughouse maintenance, cleaning, or replacement of bags as needed [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
- 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
- Operator shall maintain records of monthly amount by weight of RRP processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total thermoplastic foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit

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

Facility Name: PACTIV LLC

PERMIT UNIT: S-892-28-1 **EXPIRATION DATE:** 01/31/2022

EQUIPMENT DESCRIPTION:

260 BHP CUMMINS MODEL QSB6.7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

PERMIT UNIT REQUIREMENTS

- 1. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201]
- 2. No emission factor and no emissions shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201]
- 3. The exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- 4. Particulate matter emissions shall not exceed 0.1 grains/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]
- 5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
- 6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]
- 7. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702]
- 8. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115]
- 9. Emissions from this IC engine shall not exceed any of the following limits: 2.9 g-NOx/bhp-hr, 2.6 g- CO/bhp-hr, 0.1 g-VOC/bhp-hr, or 0.15 g-PM10/bhp-hr. [District Rule 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
- 10. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

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- 11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
- 12. Permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [District Rule 40 CFR 63 Subpart ZZZZ]
- 13. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [District Rule 40 CFR 63 Subpart ZZZZ]
- 14. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [District Rule 40 CFR 63 Subpart ZZZZ]
- 15. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [District Rule 40 CFR 63 Subpart ZZZZ]
- 16. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [District Rule 40 CFR 63 Subpart ZZZZ]
- 17. Permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with °63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 40 CFR 63 Subpart ZZZZ]
- 18. Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [District Rule 40 CFR 63 Subpart ZZZZ]
- 19. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

2024 NORRIS RD, BAKERSFIELD, CA 93308-2297 Location:

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ATTACHMENT C

Detailed Summary List of Facility Permits

Detailed Facility Report For Facility=892

Sorted by Facility Name and Permit Number S 892

3/27/23 3:53 pm

PACTIV LLC 2024 NORRIS RD			FAC	# TUS:	S 892 A		TYPE: TitleV EXPIRE ON: 01/31/2022 TOXIC ID: 50160 AREA: 82 /
BAKERSFIELD, CA	A 93308-2297			EPHONE:	6613924020		INSP. DATE: 11/23
PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-892-1-11	135 hp electric horsepower	3020-01 D	1	379.00	379.00	Α	VIRGIN RESIN UNLOADING AND STORAGE INCLUDING RAIL CAR UNLOADING FILTER/RECEIVER WITH 75 HP EXHAUST BLOWER, 60 HP FEED BLOWER, FOUR STORAGE SILOS, AND ONE FABRIC DUST COLLECTOR
S-892-2-24	70 hp	3020-01 C	1	239.00	239.00	Α	VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)
S-892-4-32	16.0 MMBtu/hr	3020-02 H	1	1,238.00	1,238.00	A	THERMOPLASTIC RESIN FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE IN 11 FLUFF STORAGE SILOS, FOUR RECLAIM EXTRUDER LINES, VOC VAPOR COLLECTION SYSTEM, AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)
S-892-5-25	60 hp	3020-01 C	1	239.00	239.00	А	RECLAIMED POLYSTYRENE PELLET (RPP) SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 10 RPP SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RPP USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDERS 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)
S-892-6-4	12,000 Gallon	3020-05 B	1	113.00	113.00	Α	12,000 GALLON BLOWING AGENT STORAGE VESSEL #1 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE
S-892-7-4	12,000 Gallon	3020-05 B	1	113.00	113.00	Α	12,000 GALLON BLOWING AGENT STORAGE VESSEL #2 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE
S-892-8-4	12,000 Gallon	3020-05 B	1	113.00	113.00	Α	12,000 GALLON BLOWING AGENT STORAGE VESSEL #3 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE.
S-892-10-37	1,600 electric motor horsepower	3020-01 H	1	1,238.00	1,238.00	Α	THERMOPLASTIC RESIN FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES
S-892-11-7	250 hp IC engine	3020-10 C	1	290.00	290.00	D	250 BHP CUMMINS MODEL NT-855-11 DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP
S-892-12-4	24 Electric Hp	3020-01 A	1	107.00	107.00	Α	REPROCESSED POLYSTYRENE PELLET (RPP) BOX DUMPER OPERATION (24 TOTAL HP)
S-892-14-1	2670.5 GALLONS	3020-05 A	1	91.00	91.00	D	2,670.5 GALLON REPROCESSED POLYSTYRENE PELLET (RPP) STORAGE SILO WITH FABRIC FILTER.
S-892-15-1	2670.5 GALLONS	3020-05 A	1	91.00	91.00	D	2,670.5 GALLON REPROCESSED POLYSTYRENE PELLET (RPP) STORAGE SILO WITH FABRIC FILTER.
S-892-16-1	2670.5 GALLONS	3020-05 A	1	91.00	91.00	D	2,670.5 GALLON REPROCESSED POLYSTYRENE PELLET (RPP) STORAGE SILO WITH FABRIC FILTER.

Detailed Facility Report
For Facility=892
Sorted by Facility Name and Permit Number
FEE FEE PERMIT

3/27/23 3:53 pm

P	ERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-	-892-17-28	1,600 electric motor horsepower	3020-01 H	1	1,238.00	1,238.00	Α	THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS, HEAT TUNNELS AND TRIM PRESSES
S-	-892-18-0	2610 bhp	3020-10 F	1	900.00	900.00	D	2,610 BHP CATERPILLAR MODEL 3516B DIESEL-FIRED EMERGENCY IC ENGINE WITH TURBOCHARGER AND AFTERCOOLER POWERING AN 1880 KW EMERGENCY GENERATOR
S-	-892-19-0	2610 bhp	3020-10 F	1	900.00	900.00	D	2,610 BHP CATERPILLAR MODEL 3516B DIESEL-FIRED EMERGENCY IC ENGINE WITH TURBOCHARGER AND AFTERCOOLER POWERING AN 1880 KW EMERGENCY GENERATOR
S-	-892-20-0	2610 bhp	3020-10 F	1	900.00	900.00	D	2,610 BHP CATERPILLAR MODEL 3516B DIESEL-FIRED EMERGENCY IC ENGINE WITH TURBOCHARGER AND AFTERCOOLER POWERING AN 1880 KW EMERGENCY GENERATOR
S-	-892-21-0	2610 bhp	3020-10 F	1	900.00	900.00	D	2,610 BHP CATERPILLAR MODEL 3516B DIESEL-FIRED EMERGENCY IC ENGINE WITH TURBOCHARGER AND AFTERCOOLER POWERING AN 1880 KW EMERGENCY GENERATOR
S-	-892-22-2	18,000 gallon	3020-05 B	1	113.00	113.00	Α	18,000 GALLON METHYL FORMATE PRESSURE VESSEL STORAGE TANK
S-	-892-23-7	47,000 dry gallons	3020-05 C	1	165.00	165.00	A	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
S-	-892-24-5	30 electric motor horsepower	3020-01 B	1	143.00	143.00	Α	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)
S-	-892-25-5	60 electric motor horsepower	3020-01 C	1	239.00	239.00	Α	OFFLINE POLYSTYRENE, POLYPROPYLENE AND POLYETHYLENE SCRAP GRINDING OPERATION CONSISTING OF TWO GRINDERS EACH SERVED BY CYCLONE VENTED TO A FABRIC SOCK FILTER
S-	-892-26-0	4,500 gallons dry	3020-05 A	1	91.00	91.00	Α	RECYCLED RESIN PELLET (RRP) STORAGE SILO WITH BIN VENT FILTER
S-	-892-28-1	260 BHP	3020-10 C	1	290.00	290.00	Α	260 BHP CUMMINS MODEL QSB6.7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

Number of Facilities Reported: 1