San Joaquin Valley Unified Air Pollution Control District

INITIAL STUDY

A. PROJECT BACKGROUND INFORMATION

1. **Project Title**: **Pactiv Corporation Facility 2001 Expansion**

2. **Lead Agency Name and Address**:
San Joaquin Valley Unified Air Pollution Control District
1990 E. Gettysburg Ave.
Fresno, CA 93726

3. **Contact Person**: **Tom Jordan – (559) 230-5802**

4. **Project Location**:
2024 Norris Road, Bakersfield, CA 93308

5. **Project Sponsor's Name and Address**:
Jim Wakeman
661-392-4021
Pactiv Corporation
2024 Norris Road
Bakersfield, CA 93308-2297

6. **Description of Project**:

Pactiv Corporation (formerly Tenneco Packaging) operates a polystyrene foam manufacturing facility in Bakersfield, CA. Currently, the facility operates 8 extruder lines and 15 thermoformer lines with associated ancillary permitted equipment. This application requests approval for the following facility modifications to allow for facility expansion:

- Modification of throughput limit of 8 existing foam extruders from 1,200 pounds per hour capacity each to 1,500 pounds per hour capacity each,
- Installation of 4 additional foam extruders with 1,500 pounds per hour throughput capacity,
- Installation of 4 additional virgin resin use bins with bin-vent filters, and
- Installation of 4 additional reclaim use bins with bin-vent filters.

The modifications proposed will result in a calculated increase in potential emissions of 190.6 tons per year VOC and 5.1 pounds per day PM10 after the fifth phase is implemented. Pactiv Corporation proposes to mitigate all increases in excess of offset thresholds with Emission Reduction Credit Certificates and BACT will be provided for all emissions unit increases in excess of two pounds per day. Pactiv is a Title V facility. A Title V application and certificate of conformity have been submitted as part of this project.

7. **Other Agencies Whose Approvals Are Required and Permits Needed**:
This project does not involve any significant changes, which would affect other

permitting authorities. Therefore, approval from other public agencies is not required.

8. **Project Compatibility with Existing Zones and Plans:**
The area is currently zoned for medium industrial use. Pactiv's project will not result in any modification to that status. The project will remain compatible with current zoning and land use designing for this region.

9. **Name of Person Who Prepared Initial Study:**
Tom Jordan

B. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impacts/Measures – Air

The modifications proposed will result in a calculated increase in potential emissions of 190.6 tons per year VOC and 5.1 pounds per day PM_{10}. Pactiv Corporation proposes to mitigate all increases in excess of offset thresholds with Emission Reduction Credit Certificates and Best Available Control Technology (BACT) will be provided for all emissions unit increases in excess of two pounds per day.

To satisfy BACT requirements for VOC emissions, all capturable emissions will be collected and routed to a regenerative thermal oxidizer for destruction. The proposed PM_{10} increase will not result in emissions in excess of the thresholds; therefore, BACT for PM_{10} emissions will not be required.

There are no increases in toxic or hazardous air pollutants proposed. The District's Risk Management Policy requires an evaluation of the risk associated with increases in hazardous air pollutants. There are no increases in any hazardous air pollutants; therefore, an evaluation of the associated health risk is not required. The plant has submitted the 1993 "Hot Spots" inventory, which was reviewed and approved by SJVUAPCD.

Increase in VOC emissions will be mitigated through the purchase and submittal of emission reduction credit certificates (ERCs). Emission reductions banked as ERCs are subject to a 10% air quality improvement deduction. The ERCs to be purchased were generated and banked at a source within 15 miles of Pactiv. Reductions to be used as offsets that were generated offsite, but within 15 miles of the source are effectively decreased in value by 20%; therefore, an additional quantity of offsets will be purchased to satisfy the requirements of a 1.2 to 1 offset ratio. Because this project will be using ERCs generated offsite, this equates to an additional 30% of banked ERCs that will be purchased, taken out of circulation, and relinquished to mitigate the project increase. Offsite ERCs are considered a valid CEQA mitigation for VOCs because VOCs have no specific Health Standard but only of a concern on a regional basis in its participation in the formation of ozone, therefore there is no perceived localized health problem. Conditions will be incorporated into the permits to ensure continuous compliance with all applicable local, state, and federal air pollution rules and regulations.

In addition, PM_{10}, SOx, NOx, VOC, and CO air emissions are being reduced through the establishment of a Pactiv Corporation employee Rideshare program. Approximately 10% of Pactiv's employees have been regular participants, with a concurrent reduction in emissions of

8,550 lb. per year.

The overall impacts on air quality after mitigation are expected to be less than significant.

Impacts/Measures – Hazards and Hazardous Materials
The proposal strictly involves the addition of four extruder lines, and ancillary equipment. Additional exposure of people or structures to adverse effects is minimal. Safety is designed into the operation of the plant.

While there is always some risk involved with the types of materials stored and handled at a polystyrene manufacturing facility, the risk of any large scale upset is minimal due to the many established safeguards and procedures that are in place and enforced. The facility participates in the OSHA and Cal-OSHA Voluntary Protection Program (a.k.a. STAR program) and has been certified since 1986. The plant holds routine drills and crisis management exercises with the participation of local agencies. All projects of this nature are subjected to management of change reviews at several stages of the project.

Under the federal and California Occupational Safety and Health Administrations (OSHA), regulations have been promulgated that require polystyrene manufacturers to prepare and implement a Process Safety Management (PSM) Program. The federal requirement is identified under Title 29 of the Code of Federal Regulations (CFR) Part 1910, Section 119 (29 CFR 1910.119) and the California regulation is found under Title 8 of the California Code of Regulations (CCR), Section 5189 (8 CCR 5189). This program considers facility design, process hazard analysis, operating procedures, training, mechanical integrity, contractor safety, process safety information, management of change, emergency procedures, chemical and material use, maintenance procedures, and pre-startup safety review. The PSM program requires participation of employees and experts in the process, and process design and safety.

Extensive safety controls exist in this polystyrene manufacturing facility to control potential sources of ignition. These controls include equipment safeguards, monitoring for hazards with equipment designed to detect sources of flammable gases and vapors, written procedures, training, and a formal procedure authorizing the use of such equipment by way of a written permit from the appropriate regulatory agency, the San Joaquin Valley Unified Air Pollution Control District. Because of these stringent controls, no increase in the risk of upset is expected at the polystyrene plant.

This project will not result in significant exposure of people to Hazards and Hazardous Materials.

Impacts/Measures – Noise
The proposal involves the addition of four extruder lines, and ancillary equipment within the confines of buildings on previously developed land.

Although noise levels are not expected to significantly increase over the long-term, there exists the potential for some short-term noise level increase that could result from the installation of the new extruders. The impact to employees and contractors working on the site due to these

noise level increases will be minimized through an existing ear plug program which is required to gain entrance to the manufacturing areas. To further ensure the hearing protecting to employees and contractors, Pactiv Corporation performs noise dosimetry measurements on an annual basis; to verify CAL/OSHA permissible exposure limits within the facility. Additionally, an audiometric hearing examination is included as part of the annual update by Pactiv Corporation's medical group to each employee's medical records. Thus, Pactiv Corporation complies with all applicable state and federal requirements as it pertains to noise level exposures. Sensitive receptors (including residential areas) are not located in the immediate construction area and no significant impacts to sensitive receptors are expected.

The project will not significantly impact Noise.

C. DETERMINATION

I certify that this project was independently reviewed and analyzed and that this document reflects the independent judgment of the District.

__X__ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

_____ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A NEGATIVE DECLARATION will be prepared.

_____ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

_____ I find that the proposed project MAY have a significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

Signature: _____ **Date:** _____

Printed name: **Title:**