

JUL 19 2012

Mark Steinberg  
SC Johnson Storage Inc  
1525 Howe Street  
Racine, WI 53403

**Re: Notice of Preliminary Decision - Emission Reduction Credits**  
**Project Number: C-1113096**

Dear Mr. Steinberg:

Enclosed for your review and comment is the District's analysis of SC Johnson Storage Inc's application for Emission Reduction Credits (ERCs) resulting from the shutdown of all emissions units, at 4787 E. Date Ave in Fresno, CA. The quantity of ERCs proposed for banking is 1st Qtr: 1,055 lb-VOC; 2nd Qtr: 1,415 lb-VOC; 3rd Qtr: 1,403 lb-VOC; 4th Qtr: 1,447 lb-VOC and 1st Qtr: 271 lb-PM10; 2nd Qtr: 360 lb-PM10; 3rd Qtr: 355 lb-PM10; 4th Qtr: 366 lb-PM10.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jesse A. Garcia of Permit Services at (559) 230-5918.

Sincerely,



David Warner  
Director of Permit Services

DW:jag

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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

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

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



JUL 19 2012

Gerardo C. Rios (AIR 3)  
Chief, Permits Office  
Air Division  
U.S. E.P.A. - Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

**Re: Notice of Preliminary Decision - Emission Reduction Credits**  
**Project Number: C-1113096**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of SC Johnson Storage Inc's application for Emission Reduction Credits (ERCs) resulting from the shutdown of all emissions units, at 4787 E. Date Ave in Fresno, CA. The quantity of ERCs proposed for banking is 1st Qtr: 1,055 lb-VOC; 2nd Qtr: 1,415 lb-VOC; 3rd Qtr: 1,403 lb-VOC; 4th Qtr: 1,447 lb-VOC and 1st Qtr: 271 lb-PM10; 2nd Qtr: 360 lb-PM10; 3rd Qtr: 355 lb-PM10; 4th Qtr: 366 lb-PM10.

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JUL 19 2012

Mike Tollstrup, Chief  
Project Assessment Branch  
Stationary Source Division  
California Air Resources Board  
PO Box 2815  
Sacramento, CA 95812-2815

**Re: Notice of Preliminary Decision - Emission Reduction Credits**  
**Project Number: C-1113096**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of SC Johnson Storage Inc's application for Emission Reduction Credits (ERCs) resulting from the shutdown of all emissions units, at 4787 E. Date Ave in Fresno, CA. The quantity of ERCs proposed for banking is 1st Qtr: 1,055 lb-VOC; 2nd Qtr: 1,415 lb-VOC; 3rd Qtr: 1,403 lb-VOC; 4th Qtr: 1,447 lb-VOC and 1st Qtr: 271 lb-PM10; 2nd Qtr: 360 lb-PM10; 3rd Qtr: 355 lb-PM10; 4th Qtr: 366 lb-PM10.

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Sincerely,

David Warner  
Director of Permit Services

DW:jag

Enclosure

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Executive Director/Air Pollution Control Officer

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Fresno Bee  
Fresno Bee

**NOTICE OF PRELIMINARY DECISION  
FOR THE PROPOSED ISSUANCE OF  
EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to SC Johnson Storage Inc for the shutdown of all emissions units, at 4787 E. Date Ave in Fresno, CA. The quantity of ERCs proposed for banking is 1st Qtr: 1,055 lb-VOC; 2nd Qtr: 1,415 lb-VOC; 3rd Qtr: 1,403 lb-VOC; 4th Qtr: 1,447 lb-VOC and 1st Qtr: 271 lb-PM10; 2nd Qtr: 360 lb-PM10; 3rd Qtr: 355 lb-PM10; 4th Qtr: 366 lb-PM10.

The analysis of the regulatory basis for this proposed action, Project #C-1113096, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the District office at the address below. Written comments on this project must be submitted within 30 days of the publication date of this notice to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.**

# Emission Reduction Credit Banking Application Review

*Shutdown of Plastic Bag Manufacturing Operation*

**Processing Engineer:** Jesse A. Garcia

**Lead Engineer:** Joven Refuerzo

**Date:** June 7, 2012

**Facility Name:** SC Johnson Storage Inc  
**Mailing Address:** 1525 Howe Street  
Racine, WI 53403

**Primary Contact:** Bill Jones  
**Phone:** (559) 488-7633  
**Email:** brjones@scj.com

**Applicant:** Mark Steinberg  
**Phone:** (262) 260-6827  
**E-mail:** mpsteinb@scj.com

**Facility Location:** 4787 E. Date Ave  
Fresno, CA 93725

**Deemed Complete Date:** January 26, 2012  
**Project Number:** C-1113096

## I. Summary:

SC Johnson operated a plastic bag manufacturing facility in Fresno, CA. The facility ceased production operations in December of 2011 and cancelled the permits in December 2011, which included two bag extrusion lines (permit units C-437-6 and -21) and four bag extrusion and printing lines (permit units C-437-7, -8, -17 and -18) in January of 2012. Therefore, the facility is applying for VOC and PM<sub>10</sub> emissions reduction credits for the shutdown of these plastic bag manufacturing operations.

SC Johnson has also surrendered Permits to Operate (PTO's) C-437-19-2, '-20-0, '-25-0 and '-27-1 of which the applicant has not requested emissions to be banked. A copy of the surrendered PTO's is included in Attachment A of this document.

Based on the historical operating data prior to the shutdown, the amounts of bankable Actual Emission Reductions (AER's) for VOC and PM<sub>10</sub> emissions are as shown in the table below. These values are calculated in Section V of this document:

<b>Bankable Emissions Reductions Credits (ERC's)</b>				
<b>Pollutant</b>	<b>1<sup>st</sup> Qtr. ERC's (lb/qtr)</b>	<b>2<sup>nd</sup> Qtr. ERC's (lb/qtr)</b>	<b>3<sup>rd</sup> Qtr. ERC's (lb/qtr)</b>	<b>4<sup>th</sup> Qtr. ERC's (lb/qtr)</b>
VOC	1,055	1,415	1,403	1,447
PM <sub>10</sub>	271	360	355	366

**II. Applicable Rules:**

- Rule 2201 - New and Modified Stationary Source Review Rule (4/21/11)
- Rule 2301 - Emission Reduction Credit Banking (12/17/92)
- Rule 4201 - Particulate Matter Concentration (12/17/92)
- Rule 4202 - Particulate Matter - Emission Rate (12/17/92)
- Rule 4682 - Polystyrene, Polyethylene, and Polypropylene Products Manufacturing (12/15/11)

**III. Location of Reductions:**

Physical Location of Equipment: 4787 E. Date Ave in Fresno, CA.

**IV. Method of Generating Reductions:**

The AER's were generated by shutting down the plastic bag manufacturing operation, which includes two bag extrusion lines and four bag extrusion lines with printing operations. The equipment description for each unit is as follows:

**C-437-6-5:**

TRAIN 55 POLYETHYLENE EXTRUSION, BAG CONVERSION PRODUCTION LINE. MAJOR EQUIPMENT INCLUDES: BAG SEALER, AND BAG RECYCLING SYSTEM WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST AND FLUFF CONVEYING BLOWER SHARED WITH TRAIN 11 (C-437-7) AND TRAIN 12 (C-437-8)

**C-437-7-3:**

TRAIN 11 POLYETHYLENE EXTRUSION, BAG CONVERSION AND BAG PRINTING PRODUCTION LINE. MAJOR EQUIPMENT INCLUDES: BAG SEALER WITH VACUUM SYSTEM; PERMIT EXEMPT ENERCON CORONA TREATER & OZONE DECOMPOSER; COMCO PRINTER; AND BAG RECYCLING SYSTEM WITH SUPPLEMENTAL GRANULATOR SHARED WITH TRAIN 55 (C-437-6) AND TRAIN 12 (C-437-8) WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST AND FLUFF CONVEYING BLOWER

**C-437-8-3:**

TRAIN 12 POLYETHYLENE EXTRUSION, BAG CONVERSION AND BAG PRINTING PRODUCTION LINE. MAJOR EQUIPMENT INCLUDES: BAG

SEALER WITH VACUUM SYSTEM; PERMIT EXEMPT ENERCON CORONA TREATER & OZONE DECOMPOSER; COMCO PRINTER; AND BAG RECYCLING SYSTEM WITH SUPPLEMENTAL GRANULATOR SHARED WITH TRAIN 55 (C-437-6) AND TRAIN 11 (C-437-7) WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST AND FLUFF CONVEYING BLOWER

**C-437-17-1:**

TRAIN 57 POLYETHYLENE EXTRUSION, BAG CONVERSION AND BAG PRINTING PRODUCTION LINE. MAJOR EQUIPMENT INCLUDES: BAG SEALER WITH VACUUM SYSTEM; MICROPERFORATOR; PERMIT EXEMPT ENERCON CORONA TREATER & OZONE DECOMPOSER; COMCO PRINTER; AND BAG RECYCLING SYSTEM SHARED WITH TRAIN 56 (C-437-21) AND TRAIN 58 (C-437-18) WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST, DUST COLLECTOR, AND FLUFF CONVEYING BLOWER

**C-437-18-4:**

TRAIN 58 POLYETHYLENE EXTRUSION, BAG CONVERSION AND BAG PRINTING PRODUCTION LINE. MAJOR EQUIPMENT INCLUDES: BAG SEALER WITH VACUUM SYSTEM; MICROPERFORATOR; PERMIT EXEMPT ENERCON CORONA TREATER & OZONE DECOMPOSER; COMCO PRINTER; AND BAG RECYCLING SYSTEM SHARED WITH TRAIN 56 (C-437-21) AND TRAIN 57 (C-437-17) WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST, DUST COLLECTOR AND FLUFF CONVEYING BLOWER

**C-437-21-4:**

TRAIN 56 POLYETHYLENE EXTRUSION, BAG CONVERSION PRODUCTION LINE INCLUDING: BAG SEALER AND BAG RECYCLING SYSTEM SHARED WITH TRAIN 57 (C-437-17) AND TRAIN 58 (C-437-18) WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST, DUST COLLECTOR, AND FLUFF CONVEYING BLOWER

**V. Calculations:**

**A. Assumptions**

**C-437-6 and -21 (polyethylene extrusion lines):**

- VOC from extrusion and PM<sub>10</sub> from scrap handling is the only pollutant emitted from these polyethylene extrusion lines.

**C-437-7, -8, -17, -18 and -21 (polyethylene extrusion and printing lines):**

- VOC from extrusion and from printing and PM<sub>10</sub> from scrap handling is the only pollutant emitted from these polyethylene extrusion lines.
- Quart sized bags require 0.0078 grams-ink/bag (per applicant)
- Gallon sized bags require 0.01204 grams-ink/bag (per applicant)

- Density of ink is 10.842 lb/gal and Specific gravity of ink is 1.3 (per MSDS)
- The thinning ratio of the ink (with ammonia) is 70% (per applicant)

**C-437-7 & -18 (polyethylene extrusion and printing lines):**

- Maximum daily emissions limited to 5.2 lb-VOC/day (per permit).
- Maximum daily emissions limited to 3.5 lb-PM10/day (per permit).
- Maximum daily resin usage limited to 31,900 lb/day (per permit).

**C-437-8 & -17 (polyethylene extrusion and printing line):**

- Maximum daily emissions limited to 7.0 lb-VOC/day (per permit).
- Maximum daily emissions limited to 4.8 lb-PM10/day (per permit).
- Maximum daily resin usage limited to 43,200 lb/day (per permit).

**B. Emission Factors (EF's)**

**C-437-6, -7, -8, -17, -18 and -21 (polyethylene extrusion lines):**

VOC Emissions from Bag Sealer:

Since all of the subject emissions units seal bags in a similar method, the source test from December 21, 2010 (See Appendix Attachment E) performed on permit C-437-18-4 will be used to compare to permitted emission factors.

<b>Source Test – December 21, 2010</b>	<b>VOC Source Test EF (lb/ton)</b>
Run #1	0.22
Run #2	0.25
Run #3	0.22
Run #4	0.23
<b>Average</b>	<b>0.23</b>

For comparison to the source test results, the permitted VOC EFs are calculated below from the permits:

C-437-6 & -21: Listed as 0.33 lb-VOC/ton on permit

C-437-7 & -18:  $(5.2 \text{ lb-VOC/day}) \div [(31,900 \text{ lb-resin/day}) \div (2,000 \text{ lb/ton})] = 0.33 \text{ lb-VOC/ton}$

C-437-8 & -17:  $(7.0 \text{ lb-VOC/day}) \div [(43,200 \text{ lb-resin/day}) \div (2,000 \text{ lb/ton})] = 0.32 \text{ lb-VOC/ton}$

The historical actual VOC emissions during the baseline period will be calculated using the lower of either the permitted emission factor of the emission factor from the abovementioned source test. Since the emission factor from the source test is lower, it will be utilized to calculate emissions.



**C-437-7, -8, -17, -18 and -21 (polyethylene extrusion and printing lines):**

VOC Emissions from Printing:

From the MSDS provided by the applicant (See Attachment G), the VOC emission factor is 1.03 lb-VOC/gal.

**C-437-6, -7, -8, -17, -18 and -21 (polyethylene extrusion lines):**

PM10:

As mentioned previously, these polyethylene extrusion lines operate in a similar method; therefore, the source test from August 14, 2001 (See Attachment F) performed on permit C-437-6-5 will be used to compare to permitted emission factors.

<b>Source Test – August 14, 2001</b>	<b>PM10 Source Test EF (lb/ton)</b>
Run #1	0.11
Run #2	0.09
Run #3	0.07
<b>Average</b>	<b>0.09</b>

For comparison to the source test results, the permitted PM10 EFs are calculated below from the permits:

C-437-6 & -21: Listed as 0.24 lb-PM10/ton on permit

C-437-7 & -18:  $(3.5 \text{ lb-PM10/day}) \div [(31,900 \text{ lb-resin/day}) \div (2,000 \text{ lb/ton})] = 0.22 \text{ lb-PM10/ton}$

C-437-8 & -17:  $(4.8 \text{ lb-PM10/day}) \div [(43,200 \text{ lb-resin/day}) \div (2,000 \text{ lb/ton})] = 0.22 \text{ lb-PM10/ton}$

The historical actual PM10 emissions during the baseline period will be calculated using the lower of either the permitted emission factor or the emission factor from the abovementioned source test. Since the emission factor from the source test is lower, it will be utilized to calculate emissions.

**C. Baseline Period Determination and Data**

**Baseline Period Determination:**

In accordance with District Rule 2201, Section 3.8, the baseline period is the two consecutive years of operation immediately prior to the submission of the complete application; or another period of at least two consecutive years within

the five years immediately prior to the submission of the complete application if it is more representative of normal source operations.

The primary purpose of this facility was to produce plastic bags by extrusion of resin. The facility has furnished resin usage and ink usage records from the facility dating from January 2006 through December 2011. Since the primary business of this facility was to produce plastic bags by extrusion of resin and ink usage is based on the number of bags produced (or resin extruded), only resin usage will be used to determine the baseline period for this facility.

The normal source operation (NSO) can be determined using the quarterly resin usage records provided by SC Johnson dating from January 2006 through December 2011.

The baseline period determination is shown in Attachment C and presented in the following table.

<b>Baseline Period Data</b>	
<b>Month</b>	<b>Resin Usage (tons)</b>
3 <sup>rd</sup> Qtr 2008	4,790
4 <sup>th</sup> Qtr 2008	4,976
1 <sup>st</sup> Qtr 2009	2,646
2 <sup>nd</sup> Qtr 2009	4,156
3 <sup>rd</sup> Qtr 2009	3,951
4 <sup>th</sup> Qtr 2009	4,066
1 <sup>st</sup> Qtr 2010	4,031
2 <sup>nd</sup> Qtr 2010	4,723
Total	33,338

**D. Historical Actual Emissions (HAE's)**

**C-437-6, -7, -8, -17, -18 and -21 (polyethylene extrusion lines):**

VOC Emissions from Extrusion:

As shown above, a VOC emission factor of 0.23 lb/ton will be used to calculate the HAE's from the shutdown of these extrusion lines. Therefore, the historical actual VOC emissions from all permit units can be calculated using this emission factor and the resin usage rates listed above.

$$\text{VOC HAE} = 0.23 \text{ lb/ton} \times \text{Resin Usage (tons/qtr)}$$

<b>VOC HAE from Resin Usage for All Permits</b>				
<b>Year</b>	<b>Q1 (lb/quarter)</b>	<b>Q2 (lb/quarter)</b>	<b>Q3 (lb/quarter)</b>	<b>Q4 (lb/quarter)</b>
2008	N/A	N/A	1,102	1,144
2009	609	956	909	935
2010	927	1,086	N/A	N/A
<b>Average</b>	<b>768</b>	<b>1,021</b>	<b>1,006</b>	<b>1,040</b>

PM10 Emissions:

As shown above, a PM10 emission factor of 0.09 lb/ton will be used to calculate the HAE's from the shutdown of these extrusion lines. Therefore, the historical actual PM10 emissions from all permit units can be calculated using this emission factor and the resin usage rates listed above.

$$\text{PM10 HAE} = 0.09 \text{ lb/ton} \times \text{Resin Usage (tons/qtr)}$$

<b>PM10 HAE for All Permits</b>				
<b>Year</b>	<b>Q1 (lb/quarter)</b>	<b>Q2 (lb/quarter)</b>	<b>Q3 (lb/quarter)</b>	<b>Q4 (lb/quarter)</b>
2008	N/A	N/A	431	448
2009	238	374	356	366
2010	363	425	N/A	N/A
<b>Average</b>	<b>301</b>	<b>400</b>	<b>394</b>	<b>407</b>

**C-437-7, -8, -17, and -18 (polyethylene extrusion lines with printing operations):**

VOC Emissions from Printing:

As shown above, a VOC emission factor of 1.03 lb-VOC/gal will be used to calculate the HAE's from the shutdown of these extrusion lines with printing operations. Therefore, the historical actual VOC emissions from the permit units can be calculated using this emission factor and the ink usage rates provided by SC Johnson.

$$\text{VOC Emissions from Printing} = (\# \text{ of Bags Produced}) \times (\text{Ink Usage Rate, grams/bag}) \div (453.6 \text{ grams/lb}) \div (62 \text{ lb/ft}^3) \times (\text{specific gravity of ink}) \times (7.48052 \text{ gal/ft}^3) \times (1.03 \text{ lb-VOC/gal}) \times (\text{Thinning Ratio})$$

<b>C-437-7 (Quart Size)</b>			
Month	Number of Bags Produced	Ink Usage Rates (grams/bag)	Lbs-VOC
3 <sup>rd</sup> Qtr 2008	125,249,613	0.0078	134.7
4 <sup>th</sup> Qtr 2008	117,131,591		72.4
1 <sup>st</sup> Qtr 2009	62,998,995		111.1
2 <sup>nd</sup> Qtr 2009	96,650,592		110.1
3 <sup>rd</sup> Qtr 2009	95,788,805		117.1
4 <sup>th</sup> Qtr 2009	101,830,995		131.0
1 <sup>st</sup> Qtr 2010	113,940,556		149.0
2 <sup>nd</sup> Qtr 2010	129,570,822		144.0
Total	843,161,969		

<b>C-437-8 (Gallon Size)</b>			
Month	Number of Bags Produced	Ink Usage Rates (grams/bag)	Lbs-VOC
3 <sup>rd</sup> Qtr 2008	93,551,385	0.01204	166.0
4 <sup>th</sup> Qtr 2008	97,302,457		172.7
1 <sup>st</sup> Qtr 2009	41,590,678		73.8
2 <sup>nd</sup> Qtr 2009	87,202,599		154.8
3 <sup>rd</sup> Qtr 2009	83,490,414		148.2
4 <sup>th</sup> Qtr 2009	84,906,203		150.7
1 <sup>st</sup> Qtr 2010	86,713,990		153.9
2 <sup>nd</sup> Qtr 2010	81,651,131		144.9
Total	656,408,857		

<b>C-437-17 (Gallon Size)</b>			
Month	Number of Bags Produced	Ink Usage Rates (grams/bag)	Lbs-VOC
3 <sup>rd</sup> Qtr 2008	90,513,611	0.01204	160.6
4 <sup>th</sup> Qtr 2008	93,086,404		165.2
1 <sup>st</sup> Qtr 2009	55,368,606		98.3
2 <sup>nd</sup> Qtr 2009	66,961,411		118.8
3 <sup>rd</sup> Qtr 2009	68,553,772		121.7
4 <sup>th</sup> Qtr 2009	61,737,204		109.6
1 <sup>st</sup> Qtr 2010	75,456,006		133.9
2 <sup>nd</sup> Qtr 2010	87,819,007		155.8
<b>Total</b>	<b>599,496,021</b>		

<b>C-437-18 (Quart Size)</b>			
Month	Number of Bags Produced	Ink Usage Rates (grams/bag)	Lbs-VOC
3 <sup>rd</sup> Qtr 2008	125,050,804	0.0078	143.8
4 <sup>th</sup> Qtr 2008	149,585,293		172.0
1 <sup>st</sup> Qtr 2009	45,047,629 <sup>1</sup>		51.8
2 <sup>nd</sup> Qtr 2009	113,782,612		130.8
3 <sup>rd</sup> Qtr 2009	96,198,006		110.6
4 <sup>th</sup> Qtr 2009	98,719,157		113.5
1 <sup>st</sup> Qtr 2010	80,228,166		92.2
2 <sup>nd</sup> Qtr 2010	117,302,181		134.9
<b>Total</b>	<b>825,913,848</b>		

<b>Total VOC HAE from Printing</b>				
Year	Q1 (lb/quarter)	Q2 (lb/quarter)	Q3 (lb/quarter)	Q4 (lb/quarter)
2008	N/A	N/A	614	645
2009	296	516	491	491
2010	511	585	N/A	N/A
<b>Average</b>	<b>404</b>	<b>551</b>	<b>553</b>	<b>568</b>

<sup>1</sup> Only one month's data supplied by applicant

<b>Total VOC HAE from Resin Usage and Printing</b>				
<b>Emissions Source</b>	<b>Q1 (lb/quarter)</b>	<b>Q2 (lb/quarter)</b>	<b>Q3 (lb/quarter)</b>	<b>Q4 (lb/quarter)</b>
Resin Usage	768	1,021	1,006	1,040
Printing	404	551	553	568
<b>Total</b>	<b>1,172</b>	<b>1,572</b>	<b>1,559</b>	<b>1,608</b>

**E. Adjustments to HAE's**

Pursuant to Section 3.23 of Rule 2201, Historical Actual Emissions must be discounted for any emissions reduction which, is:

- required or encumbered by any laws, rules, regulations, agreements, orders, or
- attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or
- proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act.

**Adjustment for Rule 2201 – New and Modified Stationary Source Review Rule:**

Section 2.0 states that this rule shall apply to all new stationary sources and all modifications to existing stationary sources which are subject to the District permit requirements and after construction emit, or may emit, one or more affected pollutants.

**Extrusion Lines:**

As discussed above, SC Johnson is proposing to receive emission reduction credits for the shutdown of their plastic bag manufacturing operation at this location. This facility is not a new stationary source and the shutdown of this operation does not meet the definition of a modification. Therefore, Rule 2201 does not apply at this time.

In accordance with information in the facility files, this operation was previously subject to District Rule 2201 when the original permits were issued and subsequently modified. Based on the actual production records provided by SC Johnson, this operation demonstrated compliance with all of the Rule 2201 requirements (best available control technology (BACT), daily emission limits, etc.). Therefore, no adjustment to the calculated HAE's above is necessary.

**Adjustment for Rule 4201 – Particulate Matter Concentration:**

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

C-437-6, -7 & -8:

$$\text{PM Conc. (gr/scf)} = \frac{(\text{PM emission rate}) \times (7,000 \text{ gr/lb})}{(\text{Air flow rate}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})}$$

PM<sub>10</sub> emission rate = 2.0 lb/day

Exhaust Gas Flow = 4,000 scfm (per Project C-1010326)

$$\text{PM Conc. (gr/scf)} = [(2.0 \text{ lb/day}) \times (7,000 \text{ gr/lb})] \div [(4,000 \text{ ft}^3/\text{min}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})]$$

PM Conc. = 0.0024 gr/dscf

Therefore, the emission factor used to calculate the actual PM emission concentration from these plastic bag manufacturing operations demonstrate that these units were in compliance with the requirements of this rule and no adjustment is necessary.

C-437-17, -18 & -21:

$$\text{PM Conc. (gr/scf)} = \frac{(\text{PM emission rate}) \times (7,000 \text{ gr/lb})}{(\text{Air flow rate}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})}$$

PM<sub>10</sub> emission rate = 2.0 lb/day

Exhaust Gas Flow = 5,000 scfm (per Project C-980005)

$$\text{PM Conc. (gr/scf)} = [(2.0 \text{ lb/day}) \times (7,000 \text{ gr/lb})] \div [(4,000 \text{ ft}^3/\text{min}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})]$$

PM Conc. = 0.009 gr/dscf

Therefore, the emission factor used to calculate the actual PM emission concentration from these plastic bag manufacturing operations demonstrate that these units were in compliance with the requirements of this rule and no adjustment is necessary.

**Adjustment for Rule 4202 – Particulate Matter Emission Rate:**

C-437-6, -7 & -8:

Section 4.1 of this rule contains the following equations for the allowable PM emissions:

$$E = 3.59P^{0.62} \text{ (P less than or equal to 30 tons/hr)}$$

$$E = 17.31P^{0.16} \text{ (P greater than 30 tons/hr)}$$

where, E = Emissions in Pounds per hour

P = Process weight rate in tons per hour

Where,

P = 0.34 tons/hour for each unit (per projects C-1000633 & C-1010326)

Therefore, the allowable PM emission rate is:

$$E_{\text{allowable}} = 3.59(P)^{0.62}$$
$$E_{\text{allowable}} = 3.59 (0.34)^{0.62}$$

$$E_{\text{allowable}} = 1.84 \text{ lb-PM/hr}$$

The potential to emit for this unit = 0.08 lb-PM10/hr. Assuming 50% of PM is PM10, PM = 0.16 lb/hr.

Therefore the emission factor listed on the permits demonstrate that these units were in compliance with the requirements of this rule and no adjustment is necessary.

C-437-17:

Section 4.1 of this rule contains the following equations for the allowable PM emissions:

$$E = 3.59P^{0.62} \text{ (P less than or equal to 30 tons/hr)}$$
$$E = 17.31P^{0.16} \text{ (P greater than 30 tons/hr)}$$

where, E = Emissions in Pounds per hour  
P = Process weight rate in tons per hour

Where,

$$P = 0.9 \text{ tons/hour (per permit)}$$

Therefore, the allowable PM emission rate is:

$$E_{\text{allowable}} = 3.59(P)^{0.62}$$
$$E_{\text{allowable}} = 3.59 (0.9)^{0.62}$$

$$E_{\text{allowable}} = 3.36 \text{ lb-PM/hr}$$

The potential to emit for this unit = 0.2 lb-PM10/hr. Assuming 50% of PM is PM10, PM = 0.4 lb/hr.

Therefore the emission factor listed on the permit demonstrates that this unit was in compliance with the requirements of this rule and no adjustment is necessary.

C-437-18:

Section 4.1 of this rule contains the following equations for the allowable PM emissions:

$$E = 3.59P^{0.62} \text{ (P less than or equal to 30 tons/hr)}$$
$$E = 17.31P^{0.16} \text{ (P greater than 30 tons/hr)}$$



where, E = Emissions in Pounds per hour  
P = Process weight rate in tons per hour

Where,

P = 0.66 tons/hour for each unit (per permit)

Therefore, the allowable PM emission rate is:

$$E_{\text{allowable}} = 3.59(P)^{0.62}$$
$$E_{\text{allowable}} = 3.59 (0.66)^{0.62}$$

$$E_{\text{allowable}} = 2.77 \text{ lb-PM/hr}$$

The potential to emit for this unit = 0.15 lb-PM<sub>10</sub>/hr. Assuming 50% of PM is PM<sub>10</sub>, PM = 0.3 lb/hr.

Therefore the emission factor listed on the permit demonstrates that this unit was in compliance with the requirements of this rule and no adjustment is necessary.

C-437-21:

Section 4.1 of this rule contains the following equations for the allowable PM emissions:

$$E = 3.59P^{0.62} \text{ (P less than or equal to 30 tons/hr)}$$
$$E = 17.31P^{0.16} \text{ (P greater than 30 tons/hr)}$$

where, E = Emissions in Pounds per hour  
P = Process weight rate in tons per hour

Where,

P = 0.34 tons/hour for each unit (per permit)

Therefore, the allowable PM emission rate is:

$$E_{\text{allowable}} = 3.59(P)^{0.62}$$
$$E_{\text{allowable}} = 3.59 (0.34)^{0.62}$$

$$E_{\text{allowable}} = 1.84 \text{ lb-PM/hr}$$

The potential to emit for this unit = 0.15 lb-PM<sub>10</sub>/hr. Assuming 50% of PM is PM<sub>10</sub>, PM = 0.3 lb/hr.

Therefore the emission factor listed on the permit demonstrates that this unit was in compliance with the requirements of this rule and no adjustment is necessary.

**Adjustment for Rule 4682 – Polystyrene, Polyethylene, and Polypropylene Products Manufacturing:**

Section 5.2.2 requires the operator of an extrusion facility to demonstrate that the total product emissions do not exceed 2.4 lbs-VOC/100 pounds of total material processed.

As demonstrated in Section V.B the emission factors listed on the permits demonstrate that these units were in compliance with the requirements of this rule and no adjustment is necessary.

**Total Adjusted Historical Actual Emissions**

Based on the discussions here in Section V.E, no adjustments to the emission factors need to be made for the purposes of this project.

**F. Actual Emissions Reductions (AER's):**

The AER's summarized from Section V.D. are presented in the tables below:

<b>Total Actual Emission Reductions (AER)</b>				
Pollutant	1 <sup>st</sup> Qtr. AER (lb/qtr)	2 <sup>nd</sup> Qtr. AER (lb/qtr)	3 <sup>rd</sup> Qtr. AER (lb/qtr)	4 <sup>th</sup> Qtr. AER (lb/qtr)
VOC	1,172	1,572	1,559	1,608
NO <sub>x</sub>	0	0	0	0
CO	0	0	0	0
PM10	301	400	394	407
SO <sub>x</sub>	0	0	0	0

**G. Air Quality Improvement Deduction**

In accordance with District Rule 2201, Sections 3.6 and 4.12.1, prior to banking, all AER's shall be discounted by 10 percent (10%) for Air Quality Improvement Deduction (AQID). The AQID for the AER's associated with this project are shown in the table below:

<b>Air Quality Improvement Deduction (AQID)</b>				
Pollutant	1 <sup>st</sup> Qtr. AQID (lb/qtr)	2 <sup>nd</sup> Qtr. AQID (lb/qtr)	3 <sup>rd</sup> Qtr. AQID (lb/qtr)	4 <sup>th</sup> Qtr. AQID (lb/qtr)
VOC	117	157	156	161
NO <sub>x</sub>	0	0	0	0
CO	0	0	0	0
PM10	30	40	39	41
SO <sub>x</sub>	0	0	0	0

**H. Bankable ERC's**

The bankable emission reduction credits (ERC's) are determined by subtraction of the AQID's from the AER's and are summarized in the table below.

<b>Bankable Emissions Reductions Credits (ERC's)</b>				
<b>Pollutant</b>	<b>1<sup>st</sup> Qtr. ERC's (lb/qtr)</b>	<b>2<sup>nd</sup> Qtr. ERC's (lb/qtr)</b>	<b>3<sup>rd</sup> Qtr. ERC's (lb/qtr)</b>	<b>4<sup>th</sup> Qtr. ERC's (lb/qtr)</b>
VOC	1,055	1,415	1,403	1,447
NO <sub>x</sub>	0	0	0	0
CO	0	0	0	0
PM10	271	360	355	366
SO <sub>x</sub>	0	0	0	0

**VI. Compliance:**

To comply with the definition of Actual Emissions Reductions (Rule 2201, Section 3.2.1 and Rule 2301, Sections 3.6 and 4.2.1), the reductions must be:

**A. Real**

The emissions reductions were generated by the shutdown of SC Johnson's plastic bag manufacturing operations. The associated permits for these units have been surrendered to the District. The emissions reductions were calculated based on actual historic production data, manufacturer's specifications, and source test results. Therefore, the allowed reductions are real.

**B. Enforceable**

The PTO's for SC Johnson plastic bag manufacturing at this facility have been surrendered to the District. Operation of any of the equipment without a valid permit would subject the permittee to enforcement actions. Therefore, the reductions are enforceable.

**C. Quantifiable**

The reductions are quantifiable since they were calculated from historic production and ink use data, source testing data, established EF's, permitted limits, and methods according to District Rule 2201.

**D. Permanent**

The reductions will be permanent since the changes are major physical changes where the facility cannot revert back. Further, any change in operation, including an increase in emissions, would require a permit from the

District. If the facility were to propose an increase in emissions in the future, offsets (as ERCs) will be required for 100% of the potential increase.

**E. Surplus**

To be considered surplus, Actual Emission Reductions shall be in excess, at the time the application for an Emission Reduction Credit or an Authority to Construct authorizing such reductions is deemed complete, of any emissions reduction which:

- **Is required or encumbered by any laws, rules, regulations, agreements, orders, or**

*No laws, rules, regulations, agreements or orders were responsible for the surrendering the facility's permits or their subsequent application for Emission Reduction Credits (ERC's).*

- **Is attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or**

*Currently there are no control measures noticed for workshop, or proposed or contained in a State Implementation Plan that require the reduction of the emissions at this facility.*

- **Is proposed in the APCO's adopted air quality plan pursuant to the California Clean Air Act.**

*The shutdown of plastic bag manufacturing is not proposed in the APCO's adopted air quality plan.*

Shutdown of the plastic bag manufacturing was voluntary and not required by any law, rule, agreement, or regulation. The ERC's are not needed for their current or proposed operations. The ERC's are not in excess of SC Johnson's permitted emission levels. Therefore, the reductions are surplus.

**F. Not used for the approval of an Authority to Construct or as offsets**

The ERC's generated by the proposed modifications were not used for the approval of any ATC or as offsets.

**G. Timely submittal**

Section 5.5 of Rule 2301 – Emissions Reduction Credit Banking (12/17/92) states that ERC certificate applications for reductions shall be submitted within 180 days after the emission reduction occurs. The ERC application was received on October 3, 2011. The plastic bag manufacturing equipment permanently ceased operations at this location on June 3, 2011, and the determination was made at that time that the factory would no longer operate. Therefore, the application was submitted in a timely fashion.

**VII. Recommendation:**

Pending a successful Public Noticing period, issue Emission Reduction Credit certificates C-1173-1 (VOC) and C-1173-4 (PM<sub>10</sub>) to SC Johnson in accordance with the amounts specified on the draft ERC certificates in Attachment G.

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**Attachments:**

- Attachment A: Surrendered PTO's C-437-6-5, -7-3, -8-3, -17-1, -18-4 and -21-4
- Attachment B: ERC Application
- Attachment C: Baseline Period Determination
- Attachment D: SC Johnson Extrusion Rates
- Attachment E: Polyethylene Extrusion Operation VOC Source Test Result Summaries
- Attachment F: Polyethylene Extrusion Operation PM10 Source Test Result Summaries
- Attachment G: MSDS for Ink Used
- Attachment H: Draft ERC Certificates

## Attachment A

Surrendered PTO's  
C-437-6-5, -7-3, -8-3, -17-1, -18-4 and -21-4

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-437-6-5

**EXPIRATION DATE:** 06/30/2016

**EQUIPMENT DESCRIPTION:**

TRAIN 55 POLYETHYLENE EXTRUSION, BAG CONVERSION PRODUCTION LINE. MAJOR EQUIPMENT INCLUDES: BAG SEALER, AND BAG RECYCLING SYSTEM WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST AND FLUFF CONVEYING BLOWER SHARED WITH TRAIN 11 (C-437-7) AND TRAIN 12 (C-437-8)

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. 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]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
6. Polyethylene resin extruded on this bag line shall not exceed 16,400 lb/day. [District Rule 2201]
7. Emissions from the Train 55 bag sealer exhaust shall not exceed either of the following: 0.24 lb PM10/ton or 0.33 lb VOC/ton. [District Rule 2201]
8. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
9. Maximum plastic bag scrap rate shall not exceed 25% of the bags produced. [District Rule 2201]
10. The recycle material removed from the scrap collection system #1 serving extrusion #T-11, #T-12, and #T-55 shall be disposed of in a manner preventing visible emissions in excess of 0% opacity into the atmosphere. [District Rule 2201]
11. Records of polyethylene extrusion process weights, weight of scrap plastic bags collected, and operating schedule shall be maintained, retained on the premises for at least five years and made available for District inspection upon request. [District Rule 1070]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-437-7-3

**EXPIRATION DATE:** 06/30/2016

**EQUIPMENT DESCRIPTION:**

TRAIN 11 POLYETHYLENE EXTRUSION, BAG CONVERSION AND BAG PRINTING PRODUCTION LINE. MAJOR EQUIPMENT INCLUDES: BAG SEALER WITH VACUUM SYSTEM; PERMIT EXEMPT ENERCON CORONA TREATER & OZONE DECOMPOSER; COMCO PRINTER; AND BAG RECYCLING SYSTEM WITH SUPPLEMENTAL GRANULATOR SHARED WITH TRAIN 55 (C-437-6) AND TRAIN 12 (C-437-8) WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST AND FLUFF CONVEYING BLOWER

## PERMIT UNIT REQUIREMENTS

---

1. The bag sealer exhaust shall be controlled by a filtration system with a filter area of at least 4 square feet by 2 inches thick . [District Rule 2201]
2. Maximum plastic bag scrap rate shall not exceed 25% of the bags produced. [District Rule 2201]
3. The recycle material removed from the scrap collection system #1 serving extrusion #T-11, #T-12, and #T-55 shall be disposed of in a manner preventing visible emissions in excess of 0% opacity into the atmosphere. [District Rule 2201]
4. Emissions from the bag sealer shall not exceed either of the following limits: 3.5 lb PM10/day or 5.2 lb VOC/day. [District Rule 2201]
5. Polyethylene resin extruded on this bag line shall not exceed 31,900 lb/day. [District Rule 2201]
6. All printing operations shall comply with Rule 4607 (Graphic Arts). [District Rule 4607]
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. 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]
10. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
11. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
12. Records of monthly ink consumption, polyethylene extrusion process weights, weight of scrap plastic bags collected, and operating schedule shall be maintained, retained on the premises for at least five years, and made available for District inspection upon request. [District Rules 1070]

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-437-8-3

**EXPIRATION DATE:** 06/30/2016

## **EQUIPMENT DESCRIPTION:**

TRAIN 12 POLYETHYLENE EXTRUSION, BAG CONVERSION AND BAG PRINTING PRODUCTION LINE. MAJOR EQUIPMENT INCLUDES: BAG SEALER WITH VACUUM SYSTEM; PERMIT EXEMPT ENERCON CORONA TREATER & OZONE DECOMPOSER; COMCO PRINTER; AND BAG RECYCLING SYSTEM WITH SUPPLEMENTAL GRANULATOR SHARED WITH TRAIN 55 (C-437-6) AND TRAIN 11 (C-437-7) WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST AND FLUFF CONVEYING BLOWER

## **PERMIT UNIT REQUIREMENTS**

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1. The bag sealer exhaust shall be controlled by a filtration system with a filter area of at least 4 square feet by 2 inches thick . [District Rule 2201]
2. Maximum plastic bag scrap rate shall not exceed 25% of the bags produced. [District Rule 2201]
3. The recycle material removed from the scrap collection system #1 serving extrusion #T-11, #T-12, and #T-55 shall be disposed of in a manner preventing visible emissions in excess of 0% opacity into the atmosphere. [District Rule 2201]
4. Emissions from the bag sealer shall not exceed either of the following limits: 4.8 lb PM10/day or 7.0 lb VOC/day. [District Rule 2201]
5. Total polyethylene resin extruded shall not exceed 43,200 lb/day. [District Rule 2201]
6. All printing operations shall comply with Rule 4607 (Graphic Arts). [District Rule 4607]
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. 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]
10. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
11. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
12. Records of monthly ink consumption, polyethylene extrusion process weights, weight of scrap plastic bags collected, and operating schedule shall be maintained, retained on the premises for at least five years, and made available for District inspection upon request. [District Rules 1070]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-437-17-1

**EXPIRATION DATE:** 06/30/2016

**EQUIPMENT DESCRIPTION:**

TRAIN 57 POLYETHYLENE EXTRUSION, BAG CONVERSION AND BAG PRINTING PRODUCTION LINE. MAJOR EQUIPMENT INCLUDES: BAG SEALER WITH VACUUM SYSTEM; MICROPERFORATOR; PERMIT EXEMPT ENERCON CORONA TREATER & OZONE DECOMPOSER; COMCO PRINTER; AND BAG RECYCLING SYSTEM SHARED WITH TRAIN 56 (C-437-21) AND TRAIN 58 (C-437-18) WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST, DUST COLLECTOR, AND FLUFF CONVEYING BLOWER

## PERMIT UNIT REQUIREMENTS

---

1. The bag sealer exhaust shall be controlled by a filtration system with a filter area of at least 4 square feet by 2 inches thick. [District Rule 2201]
2. The recycle material removed from the scrap collection system #2 serving extrusion #T-56, #T-57, and #T-58 shall be disposed of in a manner preventing visible emissions in excess of 0% opacity into the atmosphere. [District Rule 2201]
3. Emissions from the bag sealer shall not exceed either of the following limits: 4.8 lb PM10/day or 7.0 lb VOC/day. [District Rule 2201]
4. Total polyethylene resin extruded shall not exceed 43,200 lb/day. [District Rule 2201]
5. The VOC content of inks used by any equipment under this permit shall not exceed 1.5 lbs/gal, as applied, excluding water and exempt compounds. [District Rule 4607]
6. Records of monthly ink consumption, polyethylene extrusion process weights, weight of scrap plastic bags collected, and operating schedule shall be maintained, retained on the premises for at least five years, and made available for District inspection upon request. [District Rules 1070]
7. All printing operations shall comply with Rule 4607 (Graphic Arts). [District Rule 4607]
8. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
9. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
10. 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]
11. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
12. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
13. VOC emissions from the printing operation of this permit shall not exceed 5.4 lb VOC/day. [District Rule 2201]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-437-18-4

**EXPIRATION DATE:** 06/30/2016

**EQUIPMENT DESCRIPTION:**

TRAIN 58 POLYETHYLENE EXTRUSION, BAG CONVERSION AND BAG PRINTING PRODUCTION LINE. MAJOR EQUIPMENT INCLUDES: BAG SEALER WITH VACUUM SYSTEM; MICROPERFORATOR; PERMIT EXEMPT ENERCON CORONA TREATER & OZONE DECOMPOSER; COMCO PRINTER; AND BAG RECYCLING SYSTEM SHARED WITH TRAIN 56 (C-437-21) AND TRAIN 57 (C-437-17) WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST, DUST COLLECTOR AND FLUFF CONVEYING BLOWER

## PERMIT UNIT REQUIREMENTS

---

1. The bag sealer exhaust shall be controlled by a filtration system with a filter area of at least 4 square feet by 2 inches thick . [District Rule 2201]
2. The recycle material removed from the scrap collection system #2 serving extrusion #T-56, #T-57, and #T-58 shall be disposed of in a manner preventing visible emissions in excess of 0% opacity into the atmosphere. [District Rule 2201]
3. Emissions from the bag sealer shall not exceed either of the following limits: 3.5 lb PM10/day or 5.2 lb VOC/day. [District Rule 2201]
4. Total polyethylene resin extruded shall not exceed 31,900 lb/day. [District Rule 2201]
5. VOC emissions from the printing operation of this permit shall not exceed 5.4 lb VOC/day. [District Rule 2201]
6. All printing operations shall comply with Rule 4607 (Graphic Arts). [District Rule 4607]
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. 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]
10. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
11. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
12. Records of monthly ink consumption, polyethylene extrusion process weights, weight of scrap plastic bags collected, and operating schedule shall be maintained, retained on the premises for at least five years, and made available for District inspection upon request. [District Rules 1070]
13. The VOC content of inks used by any equipment under this permit shall not exceed 1.5 lbs/gal, as applied, excluding water and exempt compounds. [District Rule 4607]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-437-21-4

**EXPIRATION DATE:** 06/30/2016

**EQUIPMENT DESCRIPTION:**

TRAIN 56 POLYETHYLENE EXTRUSION, BAG CONVERSION PRODUCTION LINE INCLUDING: BAG SEALER AND BAG RECYCLING SYSTEM SHARED WITH TRAIN 57 (C-437-17) AND TRAIN 58 (C-437-18) WITH GRINDER AND GRINDER BLOWERS, FLUFF TANK EXHAUST, DUST COLLECTOR, AND FLUFF CONVEYING BLOWER

## PERMIT UNIT REQUIREMENTS

---

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. 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]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. Polyethylene resin extruded on this bag line shall not exceed 16,400 lb/day. [District Rule 2201]
6. Emissions from the Train 56 bag sealer exhaust shall not exceed either of the following limits: 0.24 lb PM10/ton or 0.33 lb VOC/ton. [District Rule 2201]
7. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201 and District NSR Rule]
8. The recycle material removed from scrap collection system #2 serving Train 56, Train 57, and Train 58 shall be disposed of in a manner preventing visible emissions in excess of 0% opacity into the atmosphere. [District Rule 2201]
9. Records of polyethylene extrusion process weights, weight of scrap plastic bags collected, and operating schedule shall be maintained, retained on the premises for at least five years, and made available for District inspection on request. [District Rule 1070]

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

**Attachment B**


**ERC Application**

# San Joaquin Valley Air Pollution Control District

## Application for

EMISSION REDUCTION CREDIT (ERC)

CONSOLIDATION OF ERC CERTIFICATES

1. ERC TO BE ISSUED TO: S.C. Johnson & Son, Inc.		Facility ID: <u>C - 437</u> (if known)				
2. MAILING ADDRESS: Street/P.O. Box: <u>1525 Howe Street</u>						
City: <u>Racine</u> State: <u>WI</u> Zip Code: <u>53403</u>						
3. LOCATION OF REDUCTION: Street: <u>4787 E. Date Ave.</u> City: <u>Fresno, CA 93725</u>  _____/4 SECTION _____ TOWNSHIP _____ RANGE _____		4. DATE OF REDUCTION: C-437-6: 06-03-2011, C-437-21: 09-09-2011, C-437-17: 09-09-2011, C-437-18: 09-09-2011, C-437-7: 12-02-2011, C-437-8: 12-02-2011				
5. PERMIT NO(S): _____ EXISTING ERC NO(S): <u>C-437-6, C-437-21, C-437-17, C-437-18, C-437-7, C-437-8</u>						
6. METHOD RESULTING IN EMISSION REDUCTION:  <input checked="" type="checkbox"/> SHUTDOWN <input type="checkbox"/> RETROFIT <input type="checkbox"/> PROCESS CHANGE <input type="checkbox"/> OTHER  DESCRIPTION: <u>Plant shutdown as described in line 4</u>						
(Use additional sheets if necessary)						
7. REQUESTED ERCs (In Pounds Per Calendar Quarter):						
	VOC	NOx	CO	PM10	SOx	OTHER
1ST QUARTER	2208.27			755.71		
2ND QUARTER	2297.91			786.03		
3RD QUARTER	2463.17			839.55		
4TH QUARTER	2498.47			852.31		
8. SIGNATURE OF APPLICANT: 				TYPE OR PRINT TITLE OF APPLICANT: S/H/E Manager - North America S.C. Johnson & Son, Inc.		
9. TYPE OR PRINT NAME OF APPLICANT: <u>Mark Steinberg</u>				DATE: <u>1/25/12</u>	TELEPHONE NO: <u>(262)-260-6827</u>	

**FOR APCD USE ONLY:**

DATE STAMP	FILING FEE RECEIVED: \$ _____ / _____
	DATE PAID: _____
	PROJECT NO.: _____ FACILITY ID.: _____

# Attachment C

## Baseline Period Determination

## Baseline Period Determination

Non-Seasonal Source (Plastic Bag Manufacturing)		
Calendar Quarter	Resin Used (tons/qtr)	8-Qtr Block Differences vs NSO
Q1 - 2006	4,327	
Q2 - 2006	3,732	
Q3 - 2006	4,481	
Q4 - 2006	4,593	
Q1 - 2007	4,886	
Q2 - 2007	4,293	
Q3 - 2007	4,903	
Q4 - 2007	4,925	370
Q1 - 2008	4,554	399
Q2 - 2008	4,241	462
Q3 - 2008	4,790	501
Q4 - 2008	4,976	549
Q1 - 2009	2,646	269
Q2 - 2009	4,156	251
Q3 - 2009	3,951	132
Q4 - 2009	4,066	25
Q1 - 2010	4,031	40
Q2 - 2010	4,723	20
Q3 - 2010	4,027	75
Q4 - 2010	4,036	193
Q1 - 2011	3,729	57
Q2 - 2011	4,246	46
Q3 - 2011	3,838	60
Q4 - 2011	1,388	395
<b>NSO Average</b>	<b>4,147</b>	

This value is the smallest "difference" compared to the Normal Source Operation (NSO) average. Therefore, the 8 consecutive quarters associated with it (Q2 2010 - Q3 2008) most closely represent NSO. As such, the baseline period is Q2 2010 - Q3 2008.

### Example 8-Qtr Block Calculation (Q2 - 2010):

8-Qtr Block = Absolute[NSO - Average(Q2-2010 through Q3-2008)]

8-Qtr Block = Absolute[4,147 - ((4,723+4,031+4,066+3,951+4,156+2,646+4,976+4,790) / 8)]

8-Qtr Block = 20



## Attachment D

### SC Johnson Extrusion Rates

S. C. Johnson Home Storage LLC  
 4787 E. Date Ave.  
 Fresno, Ca. 93725  
 Project Number: C-1113096

T11      Quart

PM10=            0.09 lb/ton      from source test on 8/14/01  
 PolyVOC=        0.23 lb/ton      from source test on 12/21/10  
 InkVOC=         N/A lb/ton

Year	Poly Extruded 1st Quarter (pounds)	Poly VOC Pounds 1st Quarter	Ink VOC Pounds 1st Quarter	PM10 Pounds 1st Quarter	Poly Extruded 2nd Quarter (pounds)	Poly VOC Pounds 2nd Quarter	Ink VOC Pounds 2nd Quarter	PM10 Pounds 2nd Quarter	Poly Extruded 3rd Quarter (pounds)	Poly VOC Pounds 3rd Quarter	Ink VOC Pounds 3rd Quarter	PM10 Pounds 3rd Quarter	Poly Extruded 4th Quarter (pounds)	Poly VOC Pounds 4th Quarter	Ink VOC Pounds 4th Quarter	PM10 Pounds 4th Quarter
2006	1451997	166.98	330.76	65.34	824669	94.84	194.77	37.11	1316370	151.38	328.73	59.24	1253868	144.19	287.86	56.42
2007	1619970	186.30	136.17	72.90	1032427	118.73	91.30	46.46	1507341	173.34	138.18	67.83	1280173	147.22	110.03	57.61
2008	1721408	197.96	143.53	77.46	1762168	202.65	154.85	79.30	1646029	189.29	143.99	74.07	1432724	164.76	134.66	64.47
2009	883941	101.65	75.94	39.78	1154307	132.75	116.51	51.94	1176414	135.29	115.47	52.94	1364841	156.96	122.75	61.42
2010	1549248	132.34	130.99	51.78	1712082	175.56	148.96	68.70	1626109	219.46	151.36	85.88	1740692	152.36	151.00	59.62
2011	1150766	132.34	103.37	51.78	1526610	175.56	129.50	68.70	1908376	219.46	151.41	85.88	1324829	152.36	105.81	59.62
<b>Average</b>		152.93	153.46	59.84		150.01	139.32	58.70		181.37	171.52	70.97		152.97	152.02	59.86

S. C. Johnson Home Storage LLC  
 4787 E. Date Ave.  
 Fresno, Ca. 93725  
 Project Number: C-1113096

T12      Gallon

PM10=        0.09 lb/ton      from source test on 8/14/01  
 PolyVOC=    0.23 lb/ton      from source test on 12/21/10  
 InkVOC=     N/A lb/ton

Year	Poly Extruded 1st Quarter (pounds)	Poly VOC Pounds 1st Quarter	Ink VOC Pounds 1st Quarter	PM10 Pounds 1st Quarter	Poly Extruded 2nd Quarter	Poly VOC Pounds 2nd Quarter	Ink VOC Pounds 2nd Quarter	PM10 Pounds 2nd Quarter	Poly Extruded 3rd Quarter	Poly VOC Pounds 3rd Quarter	Ink VOC Pounds 3rd Quarter	PM10 Pounds 3rd Quarter	Poly Extruded 4th Quarter	Poly VOC Pounds 4th Quarter	Ink VOC Pounds 4th Quarter	PM10 Pounds 4th Quarter
2006	1951986	224.48	210.12	87.84	1739960	200.10	190.84	78.30	2443695	281.02	270.18	109.97	2180962	250.81	240.64	98.14
2007	2562416	294.68	156.17	115.31	2667915	306.81	163.04	120.06	2636496	303.20	163.83	118.64	2616699	300.92	159.41	117.75
2008	2235167	257.04	138.54	100.58	737217	84.78	46.95	33.17	2525785	290.47	166.02	113.66	2581355	296.86	172.67	116.16
2009	1119600	128.75	77.39	50.38	2310249	265.68	162.26	103.96	2230825	256.54	155.36	100.39	2268165	260.84	157.99	102.07
2010	2314813	266.20	153.88	104.17	2225706	255.96	144.90	100.16	2422384	278.57	157.26	109.01	2450453	281.80	159.95	110.27
2011	2366860	272.19	157.74	106.51	2544004	292.56	115.66	114.48	2088562	240.18	137.94	93.99	1451274	166.90	94.77	65.31
Average		234.23	147.22	91.66		222.66	141.60	87.13		281.96	182.53	110.33		278.25	178.13	108.88

S. C. Johnson Home Storage LLC  
 4787 E. Date Ave.  
 Fresno, Ca. 93725  
 Project Number: C-1113096

T55 Sandwich

PM10= 0.09 lb/ton from source test on 8/14/01  
 PolyVOC= 0.23 lb/ton from source test on 12/21/10

Year	Poly Extruded 1st Quarter (pounds)	VOC Pounds 1st Quarter	PM10 Pounds 1st Quarter	Poly Extruded 2nd Quarter	VOC Pounds 2nd Quarter	PM10 Pounds 2nd Quarter	Poly Extruded 3rd Quarter	VOC Pounds 3rd Quarter	PM10 Pounds 3rd Quarter	Poly Extruded 4th Quarter	VOC Pounds 4th Quarter	PM10 Pounds 4th Quarter
2006	950713	109.33	42.78	852901	98.08	38.38	882762	101.52	39.72	857845	98.65	38.60
2007	835528	96.09	37.60	777873	89.46	35.00	797589	91.72	35.89	850732	97.83	38.28
2008	814943	93.72	36.67	852175	98.00	38.35	592722	68.16	26.67	684768	78.75	30.81
2009	649680	74.71	29.24	722317	83.07	32.50	681757	78.40	30.68	762591	87.70	34.32
2010	715443	82.28	32.19	834159	95.93	37.54	768297	88.35	34.57	800757	92.09	36.03
2011	299479	34.44	13.48	244145	28.08	10.99	0	0.00	0.00	0	0.00	0.00
<b>Average</b>			35.70			36.35			33.51			35.61

**S. C. Johnson Home Storage LLC**  
**4787 E. Date Ave.**  
**Fresno, Ca. 93725**  
**Project Number: C-1113096**

**T56 Sandwich**

**PM10= 0.09 lb/ton from source test on 8/14/01**  
**PolyVOC= 0.23 lb/ton from source test on 12/21/10**

Year	Poly Extruded 1st Quarter (pounds)	VOC Pounds 1st Quarter	PM10 Pounds 1st Quarter	Poly Extruded 2nd Quarter	VOC Pounds 2nd Quarter	PM10 Pounds 2nd Quarter	Poly Extruded 3rd Quarter	VOC Pounds 3rd Quarter	PM10 Pounds 3rd Quarter	Poly Extruded 4th Quarter	VOC Pounds 4th Quarter	PM10 Pounds 4th Quarter
2006	871073	100.17	39.20	887791	102.10	39.95	966764	111.18	43.50	953747	109.68	42.92
2007	884752	101.75	39.81	776365	89.28	34.94	790040	90.85	35.55	851242	97.89	38.31
2008	901194	103.64	40.55	839438	96.54	37.77	882581	101.50	39.72	862615	99.20	38.82
2009	651882	74.97	29.33	747466	85.96	33.64	555821	63.92	25.01	765764	88.06	34.46
2010	692455	79.63	31.16	824902	94.86	37.12	732572	84.25	32.97	629416	72.38	28.32
2011	537872	61.86	24.20	785267	90.31	35.34	517914	59.56	23.31	0	0.00	0.00
<b>Average</b>			36.01			36.68			35.35			36.57

S. C. Johnson Home Storage LLC  
 4787 E. Date Ave.  
 Fresno, Ca. 93725  
 Project Number: C-1113096

T57      Gallon

PM10=        0.09 lb/ton  
 PolyVOC=    0.23 lb/ton  
 InkVOC=     N/A lb/ton

Year	Poly Extruded 1st Quarter (pounds)	Poly VOC Pounds 1st Quarter	Ink VOC Pounds 1st Quarter	PM10 Pounds 1st Quarter	Poly Extruded 2nd Quarter	Poly VOC Pounds 2nd Quarter	Ink VOC Pounds 2nd Quarter	PM10 Pounds 2nd Quarter	Poly Extruded 3rd Quarter	Poly VOC Pounds 3rd Quarter	Ink VOC Pounds 3rd Quarter	PM10 Pounds 3rd Quarter	Poly Extruded 4th Quarter	Poly VOC Pounds 4th Quarter	Ink VOC Pounds 4th Quarter	PM10 Pounds 4th Quarter
2006	1714887	197.21	187.02	77.17	1819456	209.24	218.85	81.88	2103624	241.92	255.43	94.66	2195187	252.45	253.22	98.78
2007	2196002	252.54	141.45	98.82	1897372	218.20	128.15	85.38	2301467	264.67	153.31	103.57	2215224	254.75	147.40	99.69
2008	2092951	240.69	139.52	94.18	2358000	271.17	158.89	106.11	2204741	253.55	160.63	99.21	2334070	268.42	165.19	105.03
2009	1378886	158.57	103.03	62.05	1781417	204.86	124.60	80.16	1873204	215.42	127.56	84.29	1571056	180.67	114.88	70.70
2010	2052245	236.01	133.90	92.35	2332029	268.18	155.84	104.94	1072661	123.36	78.41	48.27	907583	104.37	69.95	40.84
2011	1660596	190.97	123.80	74.73	2075745	238.71	142.98	93.41	1850535	212.81	121.06	83.27	0	0.00	0.00	0.00
Average		217.00		84.91		234.33		91.69		219.78		86.00		212.13		83.01

S. C. Johnson Home Storage LLC  
 4787 E. Date Ave.  
 Fresno, Ca. 93725  
 Project Number: C-1113096

T58      Quart

PM10=        0.09 lb/ton  
 PolyVOC=    0.23 lb/ton  
 InkVOC=     N/A lb/ton

Year	Poly Extruded 1st Quarter (pounds)	Poly VOC Pounds 1st Quarter	Ink VOC Pounds 1st Quarter	PM10 Pounds 1st Quarter	Poly Extruded 2nd Quarter	Poly VOC Pounds 2nd Quarter	Ink VOC Pounds 2nd Quarter	PM10 Pounds 2nd Quarter	Poly Extruded 3rd Quarter	Poly VOC Pounds 3rd Quarter	Ink VOC Pounds 3rd Quarter	PM10 Pounds 3rd Quarter	Poly Extruded 4th Quarter	Poly VOC Pounds 4th Quarter	Ink VOC Pounds 4th Quarter	PM10 Pounds 4th Quarter
2006	1712729	196.96	346.68	77.07	1338620	153.94	372.68	60.24	1249076	143.64	397.34	56.21	1743600	200.51	350.37	78.46
2007	1672750	192.37	126.08	75.27	1642480	188.89	121.09	73.91	1963535	225.81	151.17	88.36	2062987	237.24	158.15	92.83
2008	1591352	183.01	125.71	71.61	2024341	232.80	168.61	91.10	1727850	198.70	143.77	77.75	2055516	236.38	171.97	92.50
2009	607030	69.81	54.30	27.32	1595507	183.48	137.16	71.80	1383004	159.05	115.96	62.24	1400178	161.02	119.00	63.01
2010	1137182	130.78	92.24	51.17	1703474	195.90	134.86	76.66	1741456	200.27	136.41	78.37	2029101	233.35	160.95	91.31
2011	1442101	165.84	120.48	64.89	1315677	151.30	124.47	59.21	1309747	150.62	104.34	58.94	0	0.00	0.00	0.00
Average		154.58		60.49		191.00		74.74		185.49		72.58		213.70		83.62

## Attachment E

### Polyethylene Extrusion Operation VOC Source Testing Result Summaries











## Attachment F

### Polyethylene Extrusion Operation PM10 Source Testing Result Summaries

# AEROS ENVIRONMENTAL, INC.

## Summary Of Results

**SC Johnson  
Fresno Facility  
Bag Sealer**

**Project 340-2414  
August 14, 2001  
Permit No. C-437-6-5**

Pollutant	gr/dscf	gr/scf	lb/hr	lb/ton	Permit Limits
<b>Particulate PM-10</b>	0.00112	0.00111	0.027	0.11	<b>0.24 lb/ton</b>
	0.00089	0.00088	0.021	0.09	
	0.00067	0.00067	0.017	0.07	
	<b>Mean</b>	<b>0.00089</b>	<b>0.00088</b>	<b>0.021</b>	
<b>Particulate Total</b>	0.00128	0.00126	0.030	0.12	<b>0.1 gr/DSCF</b>
	0.00095	0.00094	0.023	0.09	
	0.00086	0.00086	0.021	0.08	
	<b>Mean</b>	<b>0.00103 ✓</b>	<b>0.00102</b>	<b>0.025</b>	
	<b>ppm</b>		<b>lb/hr</b>	<b>lb/ton</b>	
<b>VOC C<sub>3</sub>-C<sub>6</sub> as methane</b>	0.0		0.000	0.00	<b>0.33 lb/ton</b>
	0.0		0.000	0.00	
	0.0		0.000	0.00	
	<b>Mean</b>	<b>0.0</b>		<b>0.000</b>	
<b>Production Rate = .25 tons/hr</b>					

# Attachment G

MSDS for Ink Used

MATERIAL SAFETY DATA SHEET  
For Coatings, Resins and Related Materials

Printed : 08/25/10

Revised : 08/11/10

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SECTION I - PRODUCT IDENTIFICATION

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Manufacturer: ENVIRONMENTAL INKS & COATINGS      Information Phone: 828-433-1922  
1 QUALITY PRODUCT RD                              Emergency Phone: 1-800-368-4657

MORGANTON    NC 28655

Product Class: WATER BASED INKS AND COATINGS      ! Hazard Ratings:              Health - 1  
Trade Name : H. FILM FAST DRY WHITE REV.1      ! none -> extreme              Fire - 2  
Product Code : EH070388                              ! 0 ---> 4                      Reactivity - 0  
C.A.S. Number: MIXTURE                              !  
Prepared By : TODD REDMAN                              !                              Personal Protection - B  
Title : GOVT AFFAIRS COORDINATOR

=====

SECTION II - HAZARDOUS INGREDIENTS

-----

Ingredients	CAS #	Weight %	--- Exposure Limits ----		VP mm HG
			ACGIH/TLV	OSHA/PEL	
*AMMONIUM HYDROXIDE	1336-21-6	1.822	25 ppm	35	450 ppm
			STEL= 35	NE	
ALUMINUM TRIHYDRATE	21645-51-2	1.176	10 mg/M3	15	mg/M30
n-PROPANOL	71-23-8	7.231	200 ppm	200	13 ppm
			STEL= 250		
ISOPROPYL ALCOHOL	67-63-0	0.505	400 ppm	400	33 ppm
			STEL= 500	500	

\* -> These items are listed on the SARA TITLE III Section 313 inventory

=====

SECTION III - PHYSICAL DATA

-----

Boiling Range: 180 - 207 Deg. F                      Vapor Density: Heavier than Air.  
Evap. Rate: 0.05 x n-Butyl Acetate              Liquid Density: Heavier than Water.  
Appearance: COLORED VISCOUS LIQUID; CHARACTERISTIC ODOR

\*\*\*\*\* VOC INFORMATION \*\*\*\*\*

WEIGHT PERCENT OF WATER: 31.60              VOLUME PERCENT OF WATER: 33.34  
WEIGHT PERCENT OF VOC'S: 7.80              VOLUME PERCENT OF VOC'S: 10.24  
WEIGHT PERCENT OF TNV'S: 60.60              VOLUME PERCENT OF TNV'S: 56.41  
LBS OF VOC PER GALLON OF INK LESS WATER: 1.03  
LBS OF VOC PER GALLON OF TNV: 1.22

=====

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

-----

Flammability Class: IIIA                      Flash Point: 130 F                      LEL: NONE  
-EXTINGUISHING MEDIA:  
Carbon dioxide - Dry chemical - Foam - Water fog  
Use water for cooling material stored in vicinity of fire.  
-SPECIAL FIREFIGHTING PROCEDURES:  
Use self-contained breathing apparatus with a full facepiece  
operated in pressure demand or other positive pressure mode.



=====  
SECTION IV - FIRE AND EXPLOSION HAZARD DATA (cont.)  
=====

## -UNUSUAL FIRE &amp; EXPLOSION HAZARDS:

Vapors are heavier than air and may travel along the ground to an ignition source some distance from material handling point. Ignition sources include pilot lights, smoking, electric motors, heaters, sparks from electrical switches and static discharges. CAUTION: Never use cutting torch on empty containers! Residual solvent vapor in empty container may explode.

=====  
SECTION V - HEALTH HAZARD DATA  
=====

## -PERMISSIBLE EXPOSURE LEVEL:

NOT ESTABLISHED

## -EFFECTS OF OVEREXPOSURE:

Eyes: can cause irritation, redness, tearing; blurred vision.

Skin: prolonged or repeated contact can cause moderate irritation, defatting, dermatitis.

Breathing: excessive inhalation of vapors and/or spraymist can cause respiratory irritation, dizziness, weakness, fatigue, nausea, headache, unconsciousness and even asphyxiation.

Swallowing: can cause gastrointestinal irritation, nausea, vomiting and diarrhea; aspiration of material into the lungs can cause chemical pneumonitis which can be fatal.

## -FIRST AID:

Eyes: flush with large amounts of water lifting eyelids occasionally; get prompt medical attention.

Skin: wash thoroughly with soap and water, remove contaminated clothing promptly; wash clothing before reuse.

Swallowing: do NOT induce vomiting! Keep person warm, quiet and get medical attention; aspiration of material into the lungs due to vomiting can cause chemical pneumonitis which can be fatal.

Breathing: move affected person to fresh air. If breathing is difficult, administer oxygen. If breathing has stopped, give artificial respiration. Keep person warm, quiet and get medical attention.

=====  
SECTION VI - REACTIVITY DATA  
=====

STABILITY: [ ] Unstable [x] Stable

HAZARDOUS POLYMERIZATION: [ ] May occur [x] Will not occur

## -INCOMPATIBILITY

Avoid contact with strong oxidizers ( e.g. nitric acid )

## -CONDITIONS TO AVOID:

Keep away from heat and open flame.

## -HAZARDOUS DECOMPOSITION PRODUCTS:

May form carbon monoxide and dioxide, various hydrocarbons, etc.

SECTION VII - SPILL OR LEAK PROCEDURES

-STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

SMALL SPILL: absorb liquid with rags, floor absorbent, vermiculite or other absorbent material and transfer to hood.

LARGE SPILL: eliminate all ignition sources---dike area of spill to prevent spreading---ventilate area if indoors---pump liquid into salvage tank---remaining liquid may be taken up with sand, floor absorbent or other absorbent material and shoveled into containers---prevent run-off to sewers or bodies of water---notify proper authorities as required by local, state and federal regulations.

-WASTE DISPOSAL METHOD:

No special method. Observe all applicable federal, state, and local regulations regarding the disposal of materials.

SECTION VIII - SPECIAL PROTECTION INFORMATION:

-RESPIRATORY PROTECTION:

If TLV of the product is exceeded, a NIOSH/MSHA jointly approved air supplied respirator is advised in absence of proper environmental control. OSHA regulations also permit other NIOSH/MSHA respirators under specified conditions.(see your safety equipmt. supplier). Engineering or administrative controls should be implemented to reduce exposure.

-VENTILATION:

Provide sufficient mechanical (general and/or local exhaust) ventilation to maintain exposure below TLV.

-PROTECTIVE GLOVES:

Wear resistant gloves such as: nitrile rubber.

-EYE PROTECTION:

Safety glasses or chemical goggles, depending on exposure.

-OTHER PROTECTIVE EQUIPMENT:

NONE

-ENGINEERING CONTROLS:

NONE

SECTION IX - SPECIAL PRECAUTIONS

-PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

NONE

-OTHER PRECAUTIONS:

NONE

SECTION X - OTHER REGULATORY INFORMATION

-SHIPPING INFORMATION

NONE

**Attachment H**  
**Draft ERC Certificates**

San Joaquin Valley  
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

**Emission Reduction Credit Certificate**  
**C-1173-1**

ISSUED TO: SC JOHNSON HOME STORAGE INC  
ISSUED DATE: <DRAFT>  
LOCATION OF REDUCTION: 4787 E DATE AVE  
FRESNO, CA 93725-2189

**For VOC Reduction In The Amount Of:**

Quarter 1	Quarter 2	Quarter 3	Quarter 4
1,055 lbs	1,415 lbs	1,403 lbs	1,447 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source  
 Shutdown of Emissions Units  
 Other

Shutdown of polyethylene extrusion lines

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

**DRAFT**

David Warner, Director of Permit Services

San Joaquin Valley  
Air Pollution Control District

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726

**Emission Reduction Credit Certificate**  
**C-1173-4**

ISSUED TO: SC JOHNSON HOME STORAGE INC  
ISSUED DATE: <DRAFT>  
LOCATION OF REDUCTION: 4787 E DATE AVE  
FRESNO, CA 93725-2189

**For PM10 Reduction In The Amount Of:**

Quarter 1	Quarter 2	Quarter 3	Quarter 4
271 lbs	360 lbs	355 lbs	366 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source  
 Shutdown of Emissions Units  
 Other

Shutdown of polyethylene extrusion lines

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

**DRAFT**

David Warner, Director of Permit Services