



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

November 18, 2020

SVC LLC  
1836 Stone Avenue  
San Jose, CA 95125

Attention: Denny Christensen

Application Number: 29980  
Plant Number: 24454  
Equipment Location: same as above

Dear Applicant:

Enclosed are your Permits to Operate the following:

- S-1 Ethylene Oxide Sterilizer, 3M, Model GS8X, Serial # G0000018**  
*abated by*  
**A-1 Ethylene Oxide Catalytic Bed, Electric  
Catalytic Oxidizer, 3M, ETO Abator, 50 CFM, Serial # 300171**
- S-2 Ethylene Oxide Sterilizer, 3M, Model 8XL, Serial # 3000058**  
*abated by*  
**A-2 Ethylene Oxide Catalytic Bed, Electric  
Catalytic Oxidizer, 3M, ETO Abator, 50 CFM, Serial # 300172**
- S-3 Ethylene Oxide Sterilizer, 3M, Model 8XL, Serial # 3000059**  
*abated by*  
**A-2 Ethylene Oxide Catalytic Bed, Electric  
Catalytic Oxidizer, 3M, ETO Abator, 50 CFM, Serial # 300172**
- S-4 Ethylene Oxide Sterilizer, 3M, Model GS8X, Serial # G0000018**  
*abated by*  
**A-1 Ethylene Oxide Catalytic Bed, Electric  
Catalytic Oxidizer, 3M, ETO Abator, 50 CFM, Serial # 300171**
- S-5 Ethylene Oxide Sterilizer, 3M, Model GS8X, Serial # HA000011**  
*abated by*  
**A-3 Ethylene Oxide Catalytic Bed, Electric  
Catalytic Oxidizer, 3M, ETO Abator, 50 CFM, Serial # 300391**

The equipment described above is subject to condition no. 27253.

In accordance with Regulation 2-1-411.2, you must sign your Permit to Operate. All Permits should be posted in a clearly visible and accessible place on or near the equipment to be operated or kept available for inspection at any time. Operation of this equipment in violation of District Regulations or any permit conditions is subject to penalty action.

In the absence of specific permit conditions to the contrary, the throughputs, fuel and material consumption, capacities, and hours of operation described in your permit application will be considered maximum allowable limits. A new permit will be required before any increase in these parameters or change in raw material handled may be made.

Please include your permit number with any correspondence with the District. If you have any questions on this matter please call Dennis T Jang, Supervising Air Quality Engineer at (415) 749-4707.

Very truly yours,

Pamela J. Leong  
Director of Engineering

by *Sanjeev Kamboj*  
Air Quality Engineering Manager

DTJ  
Enclosure



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

## PERMIT TO OPERATE

Plant No. 24454

Source No. 1

### SVC LLC

1836 Stone Avenue, San Jose, CA 95125

IS HEREBY GRANTED A PERMIT TO OPERATE THE FOLLOWING EQUIPMENT

Ethylene Oxide Sterilizer, 3M, Model 8XL, Serial # G0000018

*abated by*

A-1 Ethylene Oxide Catalytic Bed, Electric  
Catalytic Oxidizer, 3M, ETO Abator, 50 CFM, Serial # 300171

Subject to attached condition no. 27253.<sup>1</sup>

PAMELA J. LEONG  
DIRECTOR OF ENGINEERING

Permit Issue Date November 18, 2020  
Reported Start Up Date July 24, 2020  
Permit Expiration Date July 24, 2021

By Sanjeev Kamboj

#### Right of Entry

The Air Pollution Control Officer of the Bay Area Air Quality Management District, the Chairman of the California Air Resources Board, the Regional Administrator of the Environmental Protection Agency, and/or their designees, upon presentation of credentials, shall be granted the right of entry to any premises on which an air pollution source is located for the purposes of i) the inspection of the source, ii) the sampling of materials used at the source, iii) the conduction of an emissions source test, and iv) the inspection of any records required by District rule or permit condition.

#### Permit Expiration

In accordance with Regulation 3-408, a Permit to Operate is valid for 12 months from the date of issuance or other time period as approved by the APCO. Use of this Permit to Operate is authorized by the District until the later of the Permit Expiration Date or the Permit Renewal Date. Permit to operate fees will be prorated as described in Regulation 3-402 when the permit is renewed.

This permit does not authorize violation of the rules and regulations of the BAAQMD or the Health and Safety Code of the State of California. District regulations may be viewed online at [www.baaqmd.gov](http://www.baaqmd.gov). This permit is not transferable to another person without approval from the District. It is the responsibility of the permit holder to have knowledge of and comply with all District Rules and Regulations.

1. Compliance with conditions contained in this permit does not mean that the permit holder is currently in compliance with District Rules and Regulations.

**Permit Holder Must Sign Here** \_\_\_\_\_



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# PERMIT TO OPERATE

Plant No. 24454

Source No. 2

## SVC LLC

1836 Stone Avenue, San Jose, CA 95125

IS HEREBY GRANTED A PERMIT TO OPERATE THE FOLLOWING EQUIPMENT

Ethylene Oxide Sterilizer, 3M, Model 8XL, Serial # 30000058

*abated by*

A-2 Ethylene Oxide Catalytic Bed, Electric  
Catalytic Oxidizer, 3M, ETO Abator, 50 CFM, Serial # 300172

Subject to attached condition no. 27253.<sup>1</sup>

PAMELA J. LEONG  
DIRECTOR OF ENGINEERING

Permit Issue Date November 18, 2020  
Reported Start Up Date July 24, 2020  
Permit Expiration Date July 24, 2021

By Sanjeev Kamboj

**Right of Entry**

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**Permit Holder Must Sign Here** \_\_\_\_\_



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## PERMIT TO OPERATE

Plant No. 24454

Source No. 3

### SVC LLC

1836 Stone Avenue, San Jose, CA 95125

IS HEREBY GRANTED A PERMIT TO OPERATE THE FOLLOWING EQUIPMENT

Ethylene Oxide Sterilizer, 3M, Model 8XL, Serial # 30000059

*abated by*

A-2 Ethylene Oxide Catalytic Bed, Electric  
Catalytic Oxidizer, 3M, ETO Abator, 50 CFM, Serial # 300172

Subject to attached condition no. 27253.<sup>1</sup>

PAMELA J. LEONG  
DIRECTOR OF ENGINEERING

Permit Issue Date November 18, 2020  
Reported Start Up Date July 24, 2020  
Permit Expiration Date July 24, 2021

By Sanjeev Kamboj

#### Right of Entry

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Permit Holder Must Sign Here \_\_\_\_\_



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# PERMIT TO OPERATE

Plant No. 24454

Source No. 4

## SVC LLC

1836 Stone Avenue, San Jose, CA 95125

IS HEREBY GRANTED A PERMIT TO OPERATE THE FOLLOWING EQUIPMENT

Ethylene Oxide Sterilizer, 3M, Model GS8X, Serial # G000018

*abated by*

A-1 Ethylene Oxide Catalytic Bed, Electric  
Catalytic Oxidizer, 3M, ETO Abator, 50 CFM, Serial # 300171

Subject to attached condition no. 27253.<sup>1</sup>

PAMELA J. LEONG  
DIRECTOR OF ENGINEERING

Permit Issue Date November 18, 2020  
Reported Start Up Date July 24, 2020  
Permit Expiration Date July 24, 2021

By Sanjeev Kamboj

**Right of Entry**

The Air Pollution Control Officer of the Bay Area Air Quality Management District, the Chairman of the California Air Resources Board, the Regional Administrator of the Environmental Protection Agency, and/or their designees, upon presentation of credentials, shall be granted the right of entry to any premises on which an air pollution source is located for the purposes of : i) the inspection of the source ii) the sampling of materials used at the source iii) the conduction of an emissions source test iv) the inspection of any records required by District rule or permit condition.

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**Permit Holder Must Sign Here** \_\_\_\_\_



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# PERMIT TO OPERATE

Plant No. 24454

Source No. 5

## SVC LLC

1836 Stone Avenue, San Jose, CA 95125

IS HEREBY GRANTED A PERMIT TO OPERATE THE FOLLOWING EQUIPMENT

Ethylene Oxide Sterilizer, 3M, Model GS8X, Serial # HA000011

*abated by*

A-3 Ethylene Oxide Catalytic Bed, Electric  
Catalytic Oxidizer, 3M, ETO Abator, 50 CFM, Serial # 300391

Subject to attached condition no. 27253.<sup>1</sup>

PAMELA J. LEONG  
DIRECTOR OF ENGINEERING

Permit Issue Date November 18, 2020  
Reported Start Up Date July 24, 2020  
Permit Expiration Date July 24, 2021

By Sanjeev Kamboj

**Right of Entry**

The Air Pollution Control Officer of the Bay Area Air Quality Management District, the Chairman of the California Air Resources Board, the Regional Administrator of the Environmental Protection Agency, and/or their designees, upon presentation of credentials, shall be granted the right of entry to any premises on which an air pollution source is located for the purposes of : i) the inspection of the source ii) the sampling of materials used at the source iii) the conduction of an emissions source test iv) the inspection of any records required by District rule or permit condition.

**Permit Expiration**

In accordance with Regulation 3-408, a Permit to Operate is valid for 12 months from the date of issuance or other time period as approved by the APCO. Use of this Permit to Operate is authorized by the District until the later of the Permit Expiration Date or the Permit Renewal Date. Permit to operate fees will be prorated as described in Regulation 3-402 when the permit is renewed.

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**Permit Holder Must Sign Here** \_\_\_\_\_



**Plant Name: SVC LLC**

**Source Nos. S-1, S-2, S-3, S-4, and S-5 Ethylene Oxide Sterilizer, 3M, Model GS8X**

**Condition No. 27253**

**Plant No. 24454**

**Application No. 29980**

1. The Owner/Operator shall ensure the use of 100% ethylene oxide sterilant gas only. The use of any other sterilant gas is expressly prohibited under the terms of the permit unless prior approval and a Change of Condition is obtained in writing from the Bay Area Air Quality Management District.  
[Basis: Cumulative Increase]
2. The Owner/Operator shall ensure that the total cumulative emissions of ethylene oxide sterilant gas from sources S1, S2, S3, S4, and S5 shall not exceed 0.92 pounds per consecutive twelve-month period.  
[Basis: Cumulative Increase; Regulation 2, Rule 5]
3. The Owner/Operator shall ensure that the total number of sterilizer cycles (sterilization plus aeration) shall not exceed 3,640 cycles per consecutive 12-month period for all five sterilizers combined and the total usage of ethylene oxide gas does not exceed 1,364 pounds per year.  
[Basis: Regulation 2, Rule 5, Section 401]
4. The Owner/Operator shall ensure that the ethylene oxide emissions from Sources S1 and S4 are controlled by A1 3M Model 50 Ethylene Oxide Catalytic Oxidizer, Sources S2 and S3 are controlled by A2 3M Model 50 Ethylene Oxide Catalytic Oxidizer, and Source S5 is controlled by A3 3M Model 50 Ethylene Oxide Catalytic Oxidizer.  
[Basis: Cumulative Increase; Regulation 2, Rule 5]
5. The owner/Operator shall ensure that the sterilization cycle shall not be conducted unless ethylene oxide emissions are reduced by at least 99.99% during discharge of the sterilization phase and reduced by at least 99.90% during discharge of the aeration phase of each discrete cycle. At any time when the abatement system is unable to accept emissions from the sterilizers, the flow to the sterilizers shall automatically cease. The catalyst beds shall be replaced as needed to comply with this requirement.  
[Basis: Cumulative Increase, "Ethylene Oxide ATCM for Sterilizers and Aerators", Section 93109, Title 17, CCR, Subsection (e)]
6. In order to demonstrate compliance with parts 2 and 3, the Owner/Operator shall maintain a log of sterilant gas purchases and the date and time of each sterilization operation cycle. These records shall be retained on site for two years after the date of purchase or entry, and shall be made available for inspection by District staff upon request.





**Plant Name: SVC LLC**

**Source Nos. S-1, S-2, S-3, S-4, and S-5 Ethylene Oxide Sterilizer, 3M, Model GS8X**

**Condition No. 27253**

**Plant No. 24454**

**Application No. 29980**

[Basis: Cumulative Increase, Regulation 1, Rule 1-543]

7. To demonstrate compliance with these permit conditions, the Owner/Operator shall perform a District approved compliance source test (ARB Test Method 431) on each sterilizer within 60 days of sterilizer startup. The test shall include the sterilization cycle and the aeration cycle. The permit holder shall notify the Manager of the District's Source Test Section and the Director of the District's Engineering Division in writing at least seven(7) days prior to the test, to provide District staff the option of observing testing. Within 30 days of test completion a comprehensive report of the test results shall be submitted to the Manager of the District's Source Test Section for review and disposition.

[Basis: "Ethylene Oxide ATCM for Sterilizers and Aerators", Section 93109, Title 17, CCR, Subsections (g) and (h)]

8. To demonstrate compliance with these permit conditions, the Owner/Operator also shall perform a District-approved compliance source test (ARB Test Method 431) on each sterilizer every two years. The test shall include the sterilization cycle and the aeration cycle. The Owner/Operator shall notify the Manager of the District's Source Test Section and the Director of the District's Engineering Division in writing at least Seven (7) days prior to the test, to provide District Staff the option of observing testing. Within 30 days of test completion a comprehensive report of the test results shall be submitted to the Manager of the District's Source Test Section for review and disposition. The first source test shall be due to the District on the second anniversary of the date of the Permit to Operate.

[Basis: "Ethylene Oxide ATCM for Sterilizers and Aerators", Section 93109, Title 17, CCR, Subsections (g) and (h)]

9. The Owner/Operator shall obtain approval from the District's Technical Services Division for the installation of stack sampling ports, and for all source testing procedures. The Owner/Operator shall notify the Permit Services and Technical Divisions at least two weeks prior to any source test.

[Basis: Regulation 1, Rule 1-501]

*End of Conditions*