

Mr. Terry Smith
Tenneco Packaging AVI
1411 Pidco Drive
Plymouth, Indiana 46563

Re: 099-11469-00028
First Administrative Amendment to
Part 70 permit No.: T099-5969-00028

Dear Mr. Terry Smith:

Tenneco Packaging AVI was issued a Part 70 permit T099-5969 on June 28, 1999 for a foam packaging material production. A letter requesting a relaxation of the existing blowing agent usage limitation was received on July 19, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

The Administrative Amendment consists of incorporating the operation condition changes made under the Significant Source Modification 099-11161-00028.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

APD

cc: File - Marshall County
U.S. EPA, Region V
Marshall County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Tenneco Packaging AVI
1411 Pidco Drive
Plymouth, Indiana 46563**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-5969-00028	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 28, 1999
1 st Significant Source Modification: 099-11161-00028	
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Management	Issuance Date: Pages Affected: 29, 31, 36
1 st Administrative Amendment 099-11469-00028	
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Management	Issuance Date:

SECTION D.1

FACILITY OPERATION CONDITIONS

- (1) Three (3) profile extrusion lines, identified as PL-1, PL-2, and PL-4 respectively, using one (1) recuperative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each profile extrusion line consists of the following equipment:
 - (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
- (2) Two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, respectively. The foam sheet extrusion line identified as SL-1 uses one (1) recuperative thermal oxidizer, identified as CE02, as control which exhausts to one (1) stack identified as SC-2. The foam sheet extrusion line identified as SL-2 uses one (1) recuperative thermal oxidizer, identified as CE01, as control which exhausts to one (1) stack identified as SC-1. Each foam sheet line consists of the following equipment.
 - (a) One (1) extruder;
 - (b) One (1) foam sheet die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-1.
- (3) One (1) tandem profile extrusion line, identified as PL-3, using one (1) recuperative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3 and consists of the following equipment:
 - (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
- (4) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
- (5) Insignificant degreasing operation.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) month period, rolled on a monthly basis. This input limitation shall result in equivalent VOC emissions of 249 tons per year, rolled on a monthly basis. The VOC potential to emit (PTE) for the entire source shall not exceed 249 tons per year. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.
- (b) During the first twelve (12) months of operation, the input of VOC raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 291.6 tons per month.
- (c) Any change or modification which may increase the VOC PTE of this source to greater than 250 tons per year, shall require prior approval from IDEM, OAM before such change may occur.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1)]

- (a) Testing of this facility is specifically required by this permit. Compliance with the control efficiency and minimum operating temperature specified in Condition D.1.9 shall be determined by a performance test conducted in accordance with Section C Performance Testing.

Retention data tests shall also be determined by a performance test conducted in accordance with Section C Performance Testing.

- (b) During the period within 60 days after the issuance of this modification, a performance test shall be required to demonstrate that the source is complying with 326 IAC 8-1-6.
- (1) If the oxidizer is determined to demonstrate compliance, the required temperature and control efficiency shall be specified.
 - (2) If the oxidizer is determined to not demonstrate compliance, the efficiency needed to comply with 326 IAC 8-1-6 shall be determined by the performance test.
 - (3) The source shall be required to comply with the required control efficiency as determined by the performance test.
- (c) Retention data tests, shall be ran on all grades being utilized by the source to verify the emission factors used in establishing the blowing agent and VOC emission limits. The source shall calculate the potential to emit (PTE) based on the worst case emission factors until the various emission factors for all other sheet grades have been verified and approved by OAM.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Particulate Matter (PM)

Pursuant to CP No. 099-9807-00028, issued on October 28, 1998, the dust collectors for PM control shall be in operation at all times when SL-1, SL-2, PL-1, PL-2, PL-3 and PL-4 are in operation.

D.1.9 Recuperative Thermal Oxidizer Operations

- (a) CE01, CE02 and CE03 shall each operate at all times SL-1, SL-2, PL-1, PL-2, PL-3, and PL-4 are in operation to demonstrate compliance with the VOC limit of 249 tons per year, rolled on a monthly basis.
- (b) When operating, CE01, CE02 and CE03 shall each maintain a minimum operating temperature of 1500°F, or a minimum operating temperature as determined by the most recent compliance test, in order for each to maintain a 100% capture efficiency and a 98% destruction rate for the manufacturing process of the foam sheet and profile lines, and a 98% capture efficiency and a 97% destruction rate for the scrap lines.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Tenneco Packaging AVI
 Source Address: 1411 Pidco Drive, Plymouth, IN 46563
 Mailing Address: 1411 Pidco Drive, Plymouth, IN 46563
 Part 70 Permit No.: T099-5969-00028
 Facility: Entire Source
 Parameter: VOC PTE (blowing agent)
 Input Limit: 3,500 tons per twelve (12) month period
 Emissions Limit: 249 tons per twelve (12) month period

Year: _____

Month	Column 1		Column 2		Column 1 + 2	
	Blowing Agent Usage This Month (tons)	VOC Emissions This Month (tons)	Blowing Agent Usage for Previous 11 Months	VOC Emissions for Previous 11 Months	Blowing Agent Usage for Twelve (12)Month Total	VOC Emissions for Twelve (12)Month Total
Month 1						
Month 2						
Month 3						

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____