

Mr. Dennis Hughes
Pactiv Corporation
1411 Pidco Drive
Plymouth, IN 46563

Re: **099-13841-00028**
Second Administrative Amendment to
Part 70 099-5969-00028

Dear Mr. Hughes:

Pactiv Corporation was issued a permit on June 28, 1999 for a stationary packaging materials manufacturing plant. A letter requesting a modification was received on January 26, 2001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Pactiv Corporation has submitted a proposal for an increase in the processing speed of the existing profile reclaim line GR-8 from 700 lbs/hr to 1,000 lbs/hr, the addition of a new profile reclaim line, identified as GR-9, and the addition of a third bubble wrap line. The existing source is not a major prevention of significant deterioration (PSD) source. The unrestricted volatile organic compound (VOC) potential to emit from the increases at line GR-8 and new line GR-9 is estimated to be 6.98 tons/yr. The proposed bubble wrap line does not generate any emissions and is determined to be ancillary equipment, but the source has requested that this line be included in the insignificant activity list with the other 2 existing bubble wrap lines. The emissions generated by the proposed changes are at exempt levels under 326 IAC 2-1.1-3. The VOC emissions from the new line (GR-9) will be controlled by a thermal oxidizer with an overall control efficiency of 95%. There will be no new applicable requirements triggered or existing permit terms violated.

The proposed modification shall be incorporated into the Title V permit via an administrative amendment because the proposed changes to the Title V permit are determined to be a revision of descriptive information where the revision will not trigger a new applicable requirement or violate a permit term as specified in 326 IAC 2-7-11(a)(8). The permit shall be amended as follows with bold type indicating additional language and strike-out type indicating deleted information.

Condition A.2 is amended as follows to include the new profile line GR-9 into the source description.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary packaging materials manufacturing plant consists of the following emission units and pollution control devices:

- (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; **and**
 - (e) **One (1) scrap line with an automated grinder and reclaim, identified as GR-**

9.

Pactiv Corporation
Plymouth, Indiana
Permit Reviewer: SDF

Page 2 of 2
099-13841-00028

Condition A.3 is amended as follows to include the new bubble wrap line into the insignificant activities list.

(10) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only
Lead (Pb) = 0.6ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO2) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOx) = 5 lbs/hour or 25 lbs/day Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- a. ~~Two (2)~~ **Three (3)** bubble pack wrap lines
- b. Heat seal on bubble pack

The source description of Section D.1 is amended as follows to include the new profile line GR-9 into the source description.

(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; ; **and**
- (e) **One (1) scrap line with an automated grinder and reclaim, identified as GR-9.**

No changes to the permit are required for the proposed increases to line GR-8 because the source descriptions of Sections A and D of the permit do not reference the line speeds.

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 Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF

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

Mr. Dennis Hughes
Pactiv Corporation
1411 Pidco Drive
Plymouth, IN 46563

Re: **099-13841-00028**
Second Administrative Amendment to
Part 70 099-5969-00028

Dear Mr. Hughes:

Pactiv Corporation was issued a permit on June 28, 1999 for a stationary packaging materials manufacturing plant. A letter requesting a modification was received on January 26, 2001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Pactiv Corporation has submitted a proposal for an increase in the processing speed of the existing profile reclaim line GR-8 from 700 lbs/hr to 1,000 lbs/hr, the addition of a new profile reclaim line, identified as GR-9, and the addition of a third bubble wrap line. The existing source is not a major prevention of significant deterioration (PSD) source. The unrestricted volatile organic compound (VOC) potential to emit from the increases at line GR-8 and new line GR-9 is estimated to be 6.98 tons/yr. The proposed bubble wrap line does not generate any emissions and is determined to be ancillary equipment, but the source has requested that this line be included in the insignificant activity list with the other 2 existing bubble wrap lines. The emissions generated by the proposed changes are at exempt levels under 326 IAC 2-1.1-3. The VOC emissions from the new line (GR-9) will be controlled by a thermal oxidizer with an overall control efficiency of 95%. There will be no new applicable requirements triggered or existing permit terms violated.

The proposed modification shall be incorporated into the Title V permit via an administrative amendment because the proposed changes to the Title V permit are determined to be a revision of descriptive information where the revision will not trigger a new applicable requirement or violate a permit term as specified in 326 IAC 2-7-11(a)(8). The permit shall be amended as follows with bold type indicating additional language and strike-out type indicating deleted information.

Condition A.2 is amended as follows to include the new profile line GR-9 into the source description.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary packaging materials manufacturing plant consists of the following emission units and pollution control devices:

- (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; **and**
 - (e) **One (1) scrap line with an automated grinder and reclaim, identified as GR-**

9.

Pactiv Corporation
Plymouth, Indiana
Permit Reviewer: SDF

Page 2 of 2
099-13841-00028

Condition A.3 is amended as follows to include the new bubble wrap line into the insignificant activities list.

(10) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only
Lead (Pb) = 0.6ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO2) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOx) = 5 lbs/hour or 25 lbs/day Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- a. ~~Two (2)~~ **Three (3)** bubble pack wrap lines
- b. Heat seal on bubble pack

The source description of Section D.1 is amended as follows to include the new profile line GR-9 into the source description.

(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; ; **and**
- (e) **One (1) scrap line with an automated grinder and reclaim, identified as GR-9.**

No changes to the permit are required for the proposed increases to line GR-8 because the source descriptions of Sections A and D of the permit do not reference the line speeds.

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 Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF

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

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**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 and 326 IAC 2-1-3.2 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	Date Issued: June 28, 1999
First Minor Source Modification No.: 099-10880-00028	Date Issued: May 19, 1999
First Significant Permit Modification No.: 099-11161-00028	Date Issued: November 4, 1999
Second Significant Permit Modification No.: 099-11177-00028	Date Issued: October 18, 1999
First Administrative Amendment No.: 099-11469-00028	Date Issued: November 4, 1999
First Minor Permit Modification No.: 099-12283-00028	Date Issued: July 11, 2000
Second Administrative Amendment No.: 099-13841-00028	Affected Pages: 4, 5, and 29
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality original signed by Paul Dubenetzky	Issuance Date: April 10, 2001

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary packaging materials manufacturing plant.

Responsible Official: Terry Smith
Source Address: 1411 Pidco Drive, Plymouth, Indiana 46563
Mailing Address: 1411 Pidco Drive, Plymouth, Indiana 46563
SIC Code: 3086
County Location: Marshall
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary packaging materials manufacturing plant consists of the following emission units and pollution control devices:

- (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;
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8; and
 - (e) One (1) scrap line with an automated grinder and reclaim, identified as GR-9.
- (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 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.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary packaging materials sheet and plank foam manufacturing plant also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (4) Closed loop heating and cooling systems.
- (5) Water based adhesives that are less than or equal to 5% by volume of VOC'S excluding HAP's.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (8) Stationary fire pumps.
- (9) A laboratory as defined in 326 IAC 2-7-1(20)(c).
- (10) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only
Lead (Pb) = 0.6ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (a) Three (3) bubble pack wrap lines
- (b) Heat seal on bubble pack
- (c) Two (2) Kraft paper package mailer lines
- (d) Plank laminator
- (e) VOC emissions from the customer scrap recycling process

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;
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8; and
 - (e) One (1) scrap line with an automated grinder and reclaim, identified as GR-9.
- (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 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 1429.8 tons per twelve (12) month period, rolled on a monthly basis. This production limitation is equivalent to 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 119.15 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.

Mr. Dennis Hughes
Pactiv Corporation
1411 Pidco Drive
Plymouth, IN 46563

Re: **099-13841-00028**
Second Administrative Amendment to
Part 70 099-5969-00028

Dear Mr. Hughes:

Pactiv Corporation was issued a permit on June 28, 1999 for a stationary packaging materials manufacturing plant. A letter requesting a modification was received on January 26, 2001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Pactiv Corporation has submitted a proposal for an increase in the processing speed of the existing profile reclaim line GR-8 from 700 lbs/hr to 1,000 lbs/hr, the addition of a new profile reclaim line, identified as GR-9, and the addition of a third bubble wrap line. The existing source is not a major prevention of significant deterioration (PSD) source. The unrestricted volatile organic compound (VOC) potential to emit from the increases at line GR-8 and new line GR-9 is estimated to be 6.98 tons/yr. The proposed bubble wrap line does not generate any emissions and is determined to be ancillary equipment, but the source has requested that this line be included in the insignificant activity list with the other 2 existing bubble wrap lines. The emissions generated by the proposed changes are at exempt levels under 326 IAC 2-1.1-3. The VOC emissions from the new line (GR-9) will be controlled by a thermal oxidizer with an overall control efficiency of 95%. There will be no new applicable requirements triggered or existing permit terms violated.

The proposed modification shall be incorporated into the Title V permit via an administrative amendment because the proposed changes to the Title V permit are determined to be a revision of descriptive information where the revision will not trigger a new applicable requirement or violate a permit term as specified in 326 IAC 2-7-11(a)(8). The permit shall be amended as follows with bold type indicating additional language and strike-out type indicating deleted information.

Condition A.2 is amended as follows to include the new profile line GR-9 into the source description.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary packaging materials manufacturing plant consists of the following emission units and pollution control devices:

- (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; **and**
 - (e) **One (1) scrap line with an automated grinder and reclaim, identified as GR-**

9.

Pactiv Corporation
Plymouth, Indiana
Permit Reviewer: SDF

Page 2 of 2
099-13841-00028

Condition A.3 is amended as follows to include the new bubble wrap line into the insignificant activities list.

(10) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only
Lead (Pb) = 0.6ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO2) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOx) = 5 lbs/hour or 25 lbs/day Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- a. ~~Two (2)~~ **Three (3)** bubble pack wrap lines
- b. Heat seal on bubble pack

The source description of Section D.1 is amended as follows to include the new profile line GR-9 into the source description.

(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; ; **and**
- (e) **One (1) scrap line with an automated grinder and reclaim, identified as GR-9.**

No changes to the permit are required for the proposed increases to line GR-8 because the source descriptions of Sections A and D of the permit do not reference the line speeds.

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 Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF

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