



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 20, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant
RE: Pactiv Corporation / 099-20044-00028
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 20, 2004

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

Re: 099-20044-00028
Fourth 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 the removal of the extruded polystyrene foam insulation board manufacturing line from the Part 70 permit was received on September 7, 2004. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

1. The addition of the extruded polystyrene foam insulation board manufacturing line to the existing source was previously permitted under Significant Source Modification No. 099-13908-00028, issued on October 4, 2001. However, construction of this polystyrene foam insulation board manufacturing line, including the associated insignificant activities, was never completed. At no time were any manufacturing materials brought on site for this polystyrene foam insulation board manufacturing line nor was the line ever operated. Therefore, this emission unit, the associated section D.2, and the quarterly report form are being removed from the Part 70 permit.

Section A.2 of the Part 70 permit is revised as follows:

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) regenerative 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) regenerative thermal oxidizer, identified as CE04, as control which exhausts to one (1) stack identified as SC-2. The foam sheet extrusion line identified as SL-2 uses one (1) regenerative thermal oxidizer, identified as CE04. 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) regenerative 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) One (1) extruded polystyrene foam insulation board manufacturing line consisting of the following equipment:~~
- ~~(a) one (1) existing insulation board extruder (to replace the existing profile extrusion line (ID PL-4)), identified as ES-24, exhausting inside the building;~~
 - ~~(b) one (1) feed blender, identified as ES-25, with particulate matter emissions controlled by a baghouse, exhausting through one (1) stack identified as V25;~~
 - ~~(c) one (1) polystyrene fluff bin, identified as ES-51, with particulate matter emissions controlled by a baghouse, exhausting through one (1) stack identified as V51;~~
 - ~~(d) one (1) reclaim extruder, identified as ES-53, exhausting through one (1) stack identified as S53;~~
 - ~~(e) one (1) truckload staging operation, identified as ES-58; and~~
 - ~~(f) four (4) curing towers, together identified as ES-117, exhausting inside the building.~~

Section A.3 of the Part 70 permit is revised as follows:

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 HAPs: 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 HAPs.
- (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
Sulfur Dioxide (SO2) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOx) = 5 lbs/hour or 25 lbs/day
Carbon Monoxide (CO) = 25 lbs/day
Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (a) Two (2) 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
- (f) ~~one (1) virgin resin storage silo, identified as ES-2, exhausting through one (1) stack identified as V2;~~
- (g) ~~one (1) 30,000 gallon non-VOC (non-HAP) blowing agent storage tank, identified as ES-3;~~
- (h) ~~one (1) 18,000 gallon HAP blowing agent storage tank, identified as ES-4;~~
- (i) ~~one (1) reclaim resin storage silo, identified as ES-12, exhausting through one (1) stack identified as V12;~~
- (j) ~~one (1) railcar receiver bin, identified as ES-15, with particulate matter emissions controlled by a baghouse, exhausting through one (1) stack identified as V15;~~
- (k) ~~one (1) flexographic water based printer, identified as ES-116, exhausting inside the building.~~

Section D.2 of the Part 70 permit is removed as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

- (5) ~~One (1) extruded polystyrene foam insulation board manufacturing line consisting of the following equipment:~~
 - (a) ~~one (1) existing insulation board extruder (to replace the existing profile extrusion line (ID PL-4)), identified as ES-24, exhausting inside the building;~~
 - (b) ~~one (1) feed blender, identified as ES-25, with particulate matter emissions controlled by a baghouse, exhausting through one (1) stack identified as V25;~~
 - (c) ~~one (1) polystyrene fluff bin, identified as ES-51, with particulate matter emissions controlled by a baghouse, exhausting through one (1) stack identified as V51;~~
 - (d) ~~one (1) reclaim extruder, identified as ES-53, exhausting through one (1) stack identified as S53;~~
 - (e) ~~one (1) truckload staging operation, identified as ES-58; and~~
 - (f) ~~four (4) curing towers, together identified as ES-117, exhausting inside the building.~~

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

D.2.1 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1] [326 IAC 8-1-6]

Pursuant to the MACT determination under 326 IAC 2-4.1-1 and the BACT determination under 326 IAC 8-1-6, operation of the extruded polystyrene foam insulation board manufacturing line without the use of add-on controls and the following emission limitation will satisfy the MACT and BACT requirements:

- (a) ~~Total emissions of ethyl chloride/VOC from the polystyrene fluff bin (ES-51) and the reclaim extruder (ES-53) shall not exceed 157.0 tons per twelve (12) consecutive month period. Ethyl chloride/VOC emissions shall be calculated as follows:~~

$$\text{Ethyl chloride/VOC emissions (tons/yr)} = (\text{Foam throughput to fluff bin (lbs/hr)} \times \text{Weight \% ethyl chloride/VOC blowing agent in foam} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs}) + (\text{Foam throughput to reclaim extruder (lbs/hr)} \times \text{ethyl chloride/VOC emission factor for reclaim extruder (lb pollutant/lb foam)} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs})$$

~~D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the feed blender (ID ES-25), the fluff bin (ID ES-51), the virgin resin storage silo (ID ES-2), the reclaim resin storage silo (ID ES-12), and the railcar receiver bin (ID ES-15) shall each be limited by the following:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

~~$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
 P = process weight rate in tons per hour~~

~~The allowable emissions for each facility are as follows:~~

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Feed Blender	confidential	5.97
Fluff Bin	confidential	2.36
Virgin resin storage silo	confidential	13.62
Reclaim resin storage silo	confidential	13.62
Railcar receiver bin	confidential	15.82

Compliance Determination Requirements

~~D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]~~

~~During the period within 180 days after start-up, in order to verify the emission factors used to determine the potential emissions from the extruded polystyrene foam insulation board manufacturing line, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.~~

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.2.4 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the ethyl chloride/VOC emission limit established in Condition D.2.1.~~

- ~~(1) The throughput of polystyrene foam to the polystyrene fluff bin (ES-51) and the reclaim extruder (ES-53) in pounds;~~
- ~~(2) The weight % of ethyl chloride/VOC blowing agent in the foam; and~~
- ~~(3) The weight of ethyl chloride/VOC emitted for each compliance period.~~

~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

~~D.2.5 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

The Table of Contents has been revised to reflect the removal of section D.2.

The quarterly report form to document compliance with condition D.2.1 has been removed as shown on the following page.

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

Part 70 Quarterly Report

Source Name: _____ Pactiv Corporation
 Source Address: _____ 1411 Pidco Drive, Plymouth, IN 46563
 Mailing Address: _____ 1411 Pidco Drive, Plymouth, IN 46563
 Part 70 Permit No.: _____ T099-5969-00028
 Facility: _____ Extruded polystyrene foam insulation board manufacturing line
 Parameter: _____ ethyl chloride/VOC emissions
 Limit: _____ Total emissions of ethyl chloride/VOC from the polystyrene fluff bin (ES-51) and the reclaim extruder (ES-53) shall not exceed 157.0 tons per twelve (12) consecutive month period. Ethyl chloride/VOC emissions shall be calculated as follows:

$$\text{Ethyl chloride/VOC emissions (tons/yr)} = (\text{Foam throughput to fluff bin (lbs/hr)} \times \text{Weight \% ethyl chloride/VOC blowing agent in foam} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs}) + (\text{Foam throughput to reclaim extruder (lbs/hr)} \times \text{ethyl chloride/VOC emission factor for reclaim extruder (lb pollutant/lb foam)} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs})$$

YEAR: _____

Month	Weight % Blowing Agent in Foam to Fluff Bin	Fluff Bin Foam Throughput This Month (lbs)	Fluff Bin Foam Throughput Previous 11 Months (lbs)	12 Month Total Fluff Bin Foam Throughput (lbs)	Emission Factor (lb pollutant/lb foam) for Reclaim Extruder	Reclaim Extruder Foam Throughput This Month (lbs)	Reclaim Extruder Foam Throughput Previous 11 Months (lbs)	12 Month Total Reclaim Extruder Foam Throughput (lbs)

_____ No deviation occurred in this quarter.
 _____ Deviation/s occurred in this quarter.
 _____ Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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 Trish Earls/EVP, at (973) 575-2555, ext. 3219 or dial (800) 451-6027, and ask for extension 3-6878.

Sincerely,

Original Signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
TE/EVP

cc: File – Marshall County
U.S. EPA, Region V
Marshall County Health Department
IDEM Northern Regional Office
Air Compliance Section Inspector – Rick Reynolds
Compliance Data Section
Administrative and Development
Technical Support and Modeling



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Pactiv Corporation
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	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 28, 1999 Expiration Date: June 28, 2004

First Significant Permit Modification No.: 099-11161-00028, issued on November 4, 1999;
First Administrative Amendment No.: 099-11469-00028, issued on November 4, 1999;
Second Significant Permit Modification No.: 099-11177-00028, issued on October 18, 1999;
First Minor Permit Modification No.: 099-12283-00028, issued on July 11, 2000;
Second Administrative Amendment No.: 099-13841-00028, issued on April 10, 2001;
First Significant Source Modification No.: 099-13908-00028, issued on October 4, 2001;
Third Administrative Amendment No.: 099-15185-00028, issued on November 29, 2001;
Second Significant Source Modification No.: 099-16015-00028, issued on October 22, 2002;
Third Significant Permit Modification No.: 099-16299-00028, issued on November 7, 2002.

Fourth Administrative Amendment No.: 099-20044- Pages Affected: 3, 4, 5 00028	
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 20, 2004

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.9 Compliance Schedule [326 IAC 2-7-6(3)]
- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.12 Monitoring Methods [326 IAC 3]
- C.13 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Source29

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]
- D.1.2 General Reduction Requirements For New Facilities [326 IAC 8-1-6]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.4 Cold Cleaner Degreasing Operation [326 IAC 8-3-2]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.1.7 Volatile Organic Compounds (VOC)
- D.1.8 Particulate Matter (PM)
- D.1.9 Recuperative Thermal Oxidizer Operations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). 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)] [326 IAC 2-7-1(22)]

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

Responsible Official:	Dennis Hughes
Source Address:	1411 Pidco Drive, Plymouth, Indiana 46563
Mailing Address:	1411 Pidco Drive, Plymouth, Indiana 46563
General Source Phone Number:	219-936-7065
SIC Code:	3086
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

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) regenerative 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) regenerative thermal oxidizer, identified as CE04, as control which exhausts to one (1) stack identified as SC-2. The foam sheet extrusion line identified as SL-2 uses one (1) regenerative thermal oxidizer, identified as CE04. 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) regenerative 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):

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- (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 HAPs: 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 HAPs.
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- (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) Two (2) 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

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).