

October 7, 1998

(AR-18J)

Lloyd Eagan, Director
Bureau of Air Management
Wisconsin Department of Natural Resources
101 South Webster Street
P.O. Box 7921
Madison, Wisconsin 53707-7921

Dear Ms. Eagan:

This letter is in regards to your July 6, 1998, letter regarding a request for the United States Environmental Protection Agency (USEPA) to make a finding as to whether or not the warehouse space Tenneco Foam Products Company (Tenneco) occupies at the Indianhead facility should be considered a support facility. Since receiving your letter we have also received an August 6, 1998, letter from Tenneco stating its position in regards to the information given in your letter. As you know, we held a meeting with Tenneco and the Wisconsin Department of Natural Resources on September 3, 1998, to further discuss the matter.

After reviewing the information on Tenneco and its relationship with the Indianhead warehouse facility, USEPA has determined that the Indianhead facility does not constitute being a support facility of Tenneco. We understand that a majority of Tenneco's product is sent to the Indianhead warehouse, but the existence of the Indianhead warehouse is not solely due to its relationship with Tenneco. However, from the information provided to date, the emissions from the Indianhead warehouse coming off the Tenneco polystyrene foam product in storage may make this facility applicable for an air pollution control permit.

Since Tenneco has requested a "synthetic minor" permit, quantifiable federally enforceable conditions must be placed in the permit to ensure that the emission from the modification remain below the significant emission rates at the facility. Volatile organic compound (VOC) emissions and retention test data are necessary in order to verify the emissions proposed in the permit application. This will be required so that the potential emissions from Tenneco's proposed modification, as well as the potential emissions from the Indianhead facility, are accurately quantified in their respective permit applications. As you stated in your letter, approximately 450 tons per year of VOC's will need to be quantified from the retention data and allocated to the appropriate permit. We will work with you on these permitting actions to ensure the testing compliance methods proposed in the permit accurately verify the emissions off-gased from the product, no matter where it is located.

If you have any further questions or comments, please contact me or have your staff contact Constantine Blathras at (312) 886-0671.

Sincerely yours,

/s/

Robert Miller, Chief
Permits and Grants Section

cc: Jeff Hanson
Wisconsin Department of Natural Resources