NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Federaely Enforceable State Operating Permit (FESOP)

for Janco Engineered Products, LLC in St. County

FESOP Renewal No.: F141-42754-00593

The Indiana Department of Environmental Management (IDEM) has received an application from Janco Engineered Products, LLC located at 1217 East 7th Street, Mishawaka, Indiana 46544 for a renewal of its FESOP issued on January 15, 2016. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Janco Engineered Products, LLC to continue to operate its existing source.

A copy of the permit application and IDEM’s preliminary findings have been sent to:

Mishawaka Public Library
209 Lincoln Way East
Mishawaka, IN 46544

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you
do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F 141-42754-00593 in all correspondence.

Comments should be sent to:

Nicholas Walters  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Nicholas Walters or (317) 234-9513  
Or dial directly: (317) 234-9513  
Fax: (317) 232-6749 attn: Nicholas Walters  
E-mail: nbwalter@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, IDEM Northern Regional Office, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Nicholas Walters of my staff at the above address.

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality
Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Janco Engineered Products, LLC
1217 East 7th Street
Mishawaka, Indiana 46544

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.
TABLE OF CONTENTS

SECTION A  SOURCE SUMMARY ......................................................................................................... 4
A.1  General Information [326 IAC 2-8-3(b)]
A.2  Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.3  Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]
A.4  FESOP Applicability [326 IAC 2-8-2]

SECTION B  GENERAL CONDITIONS ................................................................................................... 7
B.1  Definitions [326 IAC 2-8-1]
B.2  Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
B.3  Term of Conditions [326 IAC 2-1.1-9.5]
B.4  Enforceability [326 IAC 2-8-6][IC 13-17-12]
B.5  Severability [326 IAC 2-8-4(4)]
B.6  Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.7  Duty to Provide Information [326 IAC 2-8-4(5)(E)]
B.8  Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(1)][326 IAC 2-8-5(1)]
B.9  Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.10  Compliance Order Issuance [326 IAC 2-8-5(b)]
B.11  Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]
B.12  Emergency Provisions [326 IAC 2-8-12]
B.13  Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.14  Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
B.15  Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
B.16  Permit Renewal [326 IAC 2-8-3(h)]
B.17  Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.18  Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.19  Source Modification Requirement [326 IAC 2-8-11.1]
B.20  Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
B.21  Transfer of Ownership or Operational Control [326 IAC 2-8-10]
B.22  Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-8-1.1-7]
B.23  Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

SECTION C  SOURCE OPERATION CONDITIONS ............................................................................. 17
Emission Limitations and Standards [326 IAC 2-8-4(1)] ........................................................................ 17
C.1  Overall Source Limit [326 IAC 2-8]
C.2  Opacity [326 IAC 5-1]
C.3  Open Burning [326 IAC 4-1][IC 13-17-9]
C.4  Incineration [326 IAC 4-2][326 IAC 9-1-2]
C.5  Fugitive Dust Emissions [326 IAC 6-4]
C.6  Stack Height [326 IAC 1-7]
C.7  Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]
Testing Requirements [326 IAC 2-8-4(3)] ................................................................................... 19
C.8  Performance Testing [326 IAC 3-6]
Compliance Requirements [326 IAC 2-1.1-11] .............................................................................. 19
C.9  Compliance Requirements [326 IAC 2-1.1-11]
Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)] ................. 20
C.10  Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
C.11  Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]
Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] ................. 20
C.12  Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]
C.13 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]
C.14 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ........................................ 22
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

Stratospheric Ozone Protection ................................................................................................. 23
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS ...................................................... 24
Emission Limitations and Standards [326 IAC 2-8-4(1)] ....................................................... 24
D.1.1 FESOP Limit - Volatile Organic Compound (VOC) [326 IAC 2-8]
D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6][326 IAC 2-8-4]
D.1.3 Hazardous Air Pollutants (HAPs) Minor Limit [326 IAC 2-8]
D.1.4 Particulate Emission Limitations (PM) [326 IAC 6.5-1-2]
D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)][326 IAC 1-6-3]

Compliance Determination Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] .................. 25
D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]
D.1.7 Particulate Control [326 IAC 2-8][326 IAC 6.5-1-2(h)]

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] ....................... 26
D.1.8 Monitoring [326 IAC 6.5-1-2(h)]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ...................................... 26
D.1.9 Record Keeping Requirements [326 IAC 2-8][326 IAC 8-1-6][326 IAC 6.5-1-2(h)]
D.1.10 Reporting Requirements [326 IAC 2-8][326 IAC 8-1-6]

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS ...................................................... 28
Emission Limitations and Standards [326 IAC 2-8-4(1)] ....................................................... 28
D.2.1 FESOP Limit - Particulate Matter (PM10 and PM2.5) [326 IAC 2-8]
D.2.2 Particulate Emission Limitations [326 IAC 6.5-1-2]
D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)][326 IAC 1-6-3]

Compliance Determination Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] .................. 29
D.2.4 Particulate Control [326 IAC 2-8][326 IAC 6.5-1-2]

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] .................... 29
D.2.5 Visible Emissions Notations [326 IAC 2-8][326 IAC 6.5-1-2]
D.2.6 Semi-Annual Baghouse Inspections
D.2.7 Broken or Failed Bag Detection [326 IAC 2-8][326 IAC 6.5-1-2]

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] ........................................ 30
D.2.8 Record Keeping Requirements [326 IAC 2-8][326 IAC 6.5-1-2]

CERTIFICATION .......................................................................................................................... 31
EMERGENCY OCCURRENCE REPORT ..................................................................................... 32
FESOP Quarterly Report ............................................................................................................. 34
FESOP Quarterly Report ............................................................................................................. 35
FESOP Quarterly Report ............................................................................................................. 36
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT .................................. 37
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 2-8-3(b)]

The Permittee owns and operates a stationary reinforced fiberglass/plastic composite tubing operation.

- Source Address: 1217 East 7th Street, Mishawaka, Indiana 46544
- General Source Phone Number: 574-255-3169
- SIC Code: 3089 (Plastics Products, Not Elsewhere Classified)
- County Location: St Joseph
- Source Location Status: Attainment for all criteria pollutants
- Source Status: Federally Enforceable State Operating Permit Program
  Minor Source, under PSD and Emission Offset Rules
  Minor Source, Section 112 of the Clean Air Act
  Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Four (4) paint booths, painting plastic parts and products, each with a maximum capacity of 60 units per hour, each equipped with two (2) high volume, low pressure (HVLP) spray guns and each with dry filters as overspray control, each constructed in 2015, consisting of the following:
   
   (1) One (1) paint booth, identified as PB1, exhausting to stack PBS1;
   
   (2) One (1) paint booth, identified as PB2, exhausting to stack PBS2;
   
   (3) One (1) paint booth, identified as PB3, exhausting to stack PBS3; and
   
   (4) One (1) paint booth, identified as PB4, exhausting to stack PBS4.

(b) One (1) auto paint line, painting plastic parts and products, identified as PB5, constructed in 2015, with a maximum capacity of 16 pounds of coating per hour, equipped with two (2) high volume, low pressure spray guns and dry filters as overspray control, exhausting to stack PBS5.

(c) Fourteen (14) pultrusion operations, for manufacturing reinforced plastic composite tubing, with a combined total capacity of 214 pounds of resin per hour, constructed in 2015, no control, all exhausting to stack P1, consisting of the following:

   (1) Three (3) dual stream pultrusion machines, identified as Line #1, Line #2, and Line #7; and

   (2) Eleven (11) single stream pultrusion machine, identified as Lines #3, #4, #5, #6, #8 through #14.
Grinding and machining operations, constructed in 2015, controlled by four (4) baghouses, identified as B1, B2, B3, or B4 venting outdoors, with B4 venting indoors, consisting of the following:

(1) Eight (8) Surface Grinders;
(2) One (1) Vibratory Deburring Bowl
(3) One (1) Pedestal Grinder
(4) Two (2) Abrasive Cut Off Saws;
(5) Eleven (11) Drill Presses;
(6) Four (4) Turret Lathes;
(7) One (1) Pin Saw
(8) Two (2) Grinder for Stabbers;
(9) One (1) Stabber Lathe;
(10) Two (2) Snuffer Sanders;
(11) One (1) Dual Head Saw;
(12) Two (2) Band Saws;
(13) One (1) Zipcut Abrasive Saw;
(14) Three (3) Lathes;
(15) One (1) Lathe Machine;
(16) One (1) Horizontal Band Saw;
(17) Four (4) Chop Saws; and
(18) Nine (9) Miscellaneous Saws.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) Abrasive Blast Cabinet, with a maximum capacity flow rate of 94 pounds per hour, constructed in 2015, using glass beads as the abrasive, controlled by dust collector, and exhausting indoors.

(b) Sixteen (16) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, constructed in 2015, consisting of the following [326 IAC 6.5-1-2]:

(1) One (1) curing oven rated at 0.526 million British thermal units per hour, identified as CO1;
(2) Fourteen (14) curing ovens rated at 0.6 million British thermal units per hour each, identified as curing oven 1 through curing oven 14; and
(3) One (1) heater rated at 0.16 million British thermal units per hour.

(c) One (1) Epoxy Adhesive Coating Station, identified as ACS1, adhesive is flow coated to pre- manufactured FRP tubes, constructed in 2015, with a maximum capacity of 100 units per hour, no control and exhausting inside.

(d) Ten (10) Epoxy Winders, identified as EW1 - EW10, with continuous spools of fiber that are dip coated, constructed in 2015, with a total capacity of 400 units per hour, no control and exhausting inside.

(e) Maintenance cleaning tanks using non-VOC and non-HAP solvent, constructed in 2015.
FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F141-42754-00593, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The
PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:
(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F141-42754-00593 and issued pursuant to permitting programs approved into the state implementation plan have been either:
(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee’s right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee’s copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
   The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
   The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

(e) This condition does not apply to emission trades of SO2 or NOx under 326 IAC 21.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]
   A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
   Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as
such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.
(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
**SECTION C  SOURCE OPERATION CONDITIONS**

**Entire Source**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

**C.1 Overall Source Limit [326 IAC 2-8]**

The purpose of this permit is to limit this source’s potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

1. The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

2. The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

3. The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source’s potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1][IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.
C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.
Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]
C.13 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

   (1) initial inspection and evaluation;
   (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
   (3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

   (1) monitoring results;
   (2) review of operation and maintenance procedures and records; and/or
   (3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.
The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Four (4) paint booths, painting plastic parts and products, each with a maximum capacity of 60 units per hour, each equipped with two (2) high volume, low pressure (HVLP) spray guns and each with dry filters as overspray control, each constructed in 2015, consisting of the following:

   (1) One (1) paint booth, identified as PB1, exhausting to stack PBS1;
   (2) One (1) paint booth, identified as PB2, exhausting to stack PBS2;
   (3) One (1) paint booth, identified as PB3, exhausting to stack PBS3; and
   (4) One (1) paint booth, identified as PB4, exhausting to stack PBS4.

(b) One (1) auto paint line, painting plastic parts and products, identified as PB5, constructed in 2015, with a maximum capacity of 16 pounds of coating per hour, equipped with two (2) high volume, low pressure spray guns and dry filters as overspray control, exhausting to stack PBS5.

(c) Fourteen (14) pultrusion operations, for manufacturing reinforced plastic composite tubing, with a combined total capacity of 214 pounds of resin per hour, constructed in 2015, no control, all exhausting to stack P1, consisting of the following:

   (1) Three (3) dual stream pultrusion machines, identified as Line #1, Line #2, and Line #7; and
   (2) Eleven (11) single stream pultrusion machine, identified as Lines #3, #4, #5, #6, #8 through #14.

Insignificant Activities

(c) One (1) Epoxy Adhesive Coating Station, identified as ACS1, adhesive is flow coated to pre-manufactured FRP tubes, constructed in 2015, with a maximum capacity of 100 units per hour, no control and exhausting inside.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP Limit - Volatile Organic Compound (VOC) [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4 (FESOP), the total VOC input to the following, including coatings, dilution solvents, and cleaning solvents, shall not exceed 40 tons combined per twelve (12) consecutive month period with compliance determined at the end of each month:

- Paint Booth PB1
- Paint Booth PB2
- Paint Booth PB3
- Paint Booth PB4
Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render 326 IAC 2-7 not applicable.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6][326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 and in order to render 326 IAC 8-1-6 not applicable, the VOC input to Auto Paint Line (PB5), including coatings, dilution solvents, and cleaning solvents, shall be less than 25 tons combined per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these emission limits will limit VOC emissions from the Auto Paint Line (PB5) to less than twenty-five (25) tons per year, which renders the requirements of 326 IAC 8-1-6 not applicable.

In addition, compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render 326 IAC 2-7 not applicable.

D.1.3 Hazardous Air Pollutants (HAPs) Minor Limit [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

The total usage of any single HAP from the 14 pultrusion operations shall not exceed 9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits will limit the source-wide Single HAPs PTE to less than ten (10) tons per year and will render the entire source an area source and 40 CFR 63, Subpart WWWW, and 40 CFR 63, Subpart PPPP not applicable.

D.1.4 Particulate Emission Limitations (PM) [326 IAC 6.5-1-2]

(a) Pursuant to 326 IAC 6.5-1-2(h), particulate from the following shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer’s specifications:

<table>
<thead>
<tr>
<th>Paint Booth PB1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paint Booth PB2</td>
</tr>
<tr>
<td>Paint Booth PB3</td>
</tr>
<tr>
<td>Paint Booth PB4</td>
</tr>
<tr>
<td>Auto Paint Line PB5</td>
</tr>
</tbody>
</table>

(b) Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from each pultrusion machine, identified as Line #1 through Line #14, shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)][326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and
D.1.3, shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Particulate Control [326 IAC 2-8][326 IAC 6.5-1-2(h)]

In order to comply with Condition D.1.4, the dry particulate filter on the following shall be in operation and control emissions from its associated emission units at all times that the associated emission units are in operation:

| Paint Booth PB1 |
| Paint Booth PB2 |
| Paint Booth PB3 |
| Paint Booth PB4 |
| Auto Paint Line PB5 |

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring [326 IAC 6.5-1-2(h)]

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the following while the booth exhausting to the stack is in operation:

| Paint Booth PB1 |
| Paint Booth PB2 |
| Paint Booth PB3 |
| Paint Booth PB4 |
| Auto Paint Line PB5 |

If a condition exists which should result in a response step the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emission is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.9 Record Keeping Requirements [326 IAC 2-8][326 IAC 8-1-6][326 IAC 6.5-1-2(h)]

(a) To document the compliance status with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and usage limits and the HAP content and usage limits established in Conditions D.1.1, D.1.2, and D.1.3.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent used on monthly basis.
(A) Records shall include purchase orders, invoices, and safety data sheets (SDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month.

(4) The total VOC and total single HAP usage for each month.

(5) The total VOC and total single HAP usage for each compliance period.

(b) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of daily dry particulate filter inspections, weekly overspray observations, and monthly inspections. The Permittee shall include in its daily record when a dry particulate filter inspection is not performed and the reason for the lack of dry particulate filter inspection notation (e.g., the process did not operate that day).

(c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.10 Reporting Requirements [326 IAC 2-8][326 IAC 8-1-6]

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.3, 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.
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

(d) Grinding and machining operations, constructed in 2015, controlled by four (4) baghouses, identified as B1, B2, B3, or B4, venting outdoors, with B4 venting indoors, consisting of the following:

1. Eight (8) Surface Grinders;
2. One (1) Vibratory Deburring Bowl
3. One (1) Pedestal Grinder
4. Two (2) Abrasive Cut Off Saws;
5. Eleven (11) Drill Presses;
6. Four (4) Turret Lathes;
7. One (1) Pin Saw
8. Two (2) Grinder for Stabbers;
9. One (1) Stabber Lathe;
10. Two (2) Snuffer Sanders;
11. One (1) Dual Head Saw;
12. Two (2) Band Saws;
13. One (1) Zipcut Abrasive Saw;
14. Three (3) Lathes;
15. One (1) Lathe Machine;
16. One (1) Horizontal Band Saw;
17. Four (4) Chop Saws; and
18. Nine (9) Miscellaneous Saws

### Insignificant Activities

(a) One (1) Abrasive Blast Cabinet, with a maximum capacity flow rate of 94 pounds per hour, constructed in 2015, using glass beads as the abrasive, controlled by dust collector, and exhausting indoors.

(b) Sixteen (16) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, constructed in 2015, consisting of the following:

1. One (1) curing oven rated at 0.526 million British thermal units per hour, identified as CO1;
2. Fourteen (14) curing ovens rated at 0.6 million British thermal units per hour each, identified as curing oven 1 through curing oven 14; and
3. One (1) heater rated at 0.16 million British thermal units per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

**D.2.1 FESOP Limit - Particulate Matter (PM10 and PM2.5) [326 IAC 2-8]**

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following after control limits:
<table>
<thead>
<tr>
<th>Baghouse</th>
<th>PM10 (lb/hr)</th>
<th>PM2.5 (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>B1</td>
<td>1.37</td>
<td>1.37</td>
</tr>
<tr>
<td>B2</td>
<td>1.37</td>
<td>1.37</td>
</tr>
<tr>
<td>B3</td>
<td>1.37</td>
<td>1.37</td>
</tr>
<tr>
<td>B4</td>
<td>0.46</td>
<td>0.46</td>
</tr>
</tbody>
</table>

Compliance with these limits combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source wide total potential to emit of PM10 and PM2.5 to less than one hundred (100) tons per year and shall make the requirements of 326 IAC 2-7, not applicable.

D.2.2 Particulate Emission Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), the following grinding and machining operations, abrasive blast cabinet, and natural gas combustion units, shall comply with the requirements of 326 IAC 6.5-1-2(a) which requires shall each not discharge to the atmosphere any gases which contain PM in excess of 0.03 grain per dry standard cubic foot:

(a) Grinding and machining operations,
(b) Abrasive Blast Cabinet, and
(c) Natural gas combustion.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)][326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.2.4 Particulate Control [326 IAC 2-8][326 IAC 6.5-1-2]

In order to comply with Conditions D.2.1 and D.2.2, the baghouses and dust collector for particulate control shall be in operation and control emissions from the grinding and machining operations and Abrasive Blast Cabinet at all times the grinding and machining operations and Abrasive Blast Cabinet are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations [326 IAC 2-8][326 IAC 6.5-1-2]

(a) Daily visible emission notations of the grinding and machining operations baghouses B1, B2, and B3 stacks shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(d) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's
obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

D.2.6 Semi-Annual Baghouse Inspections

The Permittee shall perform semi-annual inspections of the Baghouse (B4) controlling particulate emissions from the Grinding and machining operations to verify that they are being operated and maintained in accordance with the manufacturer’s specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection [326 IAC 2-8][326 IAC 6.5-1-2]

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse’s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)]

D.2.8 Record Keeping Requirements [326 IAC 2-8][326 IAC 6.5-1-2]

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of the visible emission notations from the baghouses B1, B2 and B3 stacks. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

(b) To document the compliance status with Condition D.2.6, the Permittee shall maintain records of the dates and results of the semi-annual inspections required under Condition D.2.6.

(c) Section C - General Record Keeping Requirements contains the Permittee’s obligations with regard to the records required by this condition.
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Janco Engineered Products, LLC
Source Address: 1217 East 7th Street, Mishawaka, Indiana 46544
FESOP Permit No.: F141-42754-00593

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) __________________________________________________________

☐ Report (specify) _____________________________________________________________

☐ Notification (specify) _________________________________________________________

☐ Affidavit (specify) ___________________________________________________________

☐ Other (specify) _____________________________________________________________

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Janco Engineered Products, LLC
Source Address: 1217 East 7th Street, Mishawaka, Indiana 46544
FESOP Permit No.: F141-42754-00593

This form consists of 2 pages Page 1 of 2

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  • The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business
    hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  • The Permittee must submit notice in writing or by facsimile within two (2) working days
    (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
<table>
<thead>
<tr>
<th>If any of the following are not applicable, mark N/A</th>
</tr>
</thead>
</table>

| Date/Time Emergency started:                     |
| Date/Time Emergency was corrected:               |
| Was the facility being properly operated at the time of the emergency? | Y | N |
| Type of Pollutants Emitted: TSP, PM-10, SO$_2$, VOC, NO$_x$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |

| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: ________________________________________________
Title / Position: ____________________________________________________
Date: ____________________________________________________________
Phone: ____________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

FESOP Quarterly Report

Source Name: Janco Engineered Products, LLC  
Source Address: 1217 East 7th Street, Mishawaka, Indiana 46544  
FESOP Permit No.: F141-42754-00593  
Facility: Paint booths (PB1, PB2, PB3, and PB4)  
Parameter: VOC input  
Limit: Shall not exceed 40 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>VOC input (tons)</td>
<td>VOC input (tons)</td>
<td>VOC input (tons)</td>
<td></td>
</tr>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

Submitted by: ________________________________

Title / Position: ________________________________

Signature: ________________________________

Date: ________________________________

Phone: ________________________________
Source Name: Janco Engineered Products, LLC  
Source Address: 1217 East 7th Street, Mishawaka, Indiana 46544  
FESOP Permit No.: F141-42754-00593  
Facility: Auto paint line (PB5)  
Parameter: VOC input  
Limit: Shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>VOC input (tons)</td>
<td>VOC input (tons)</td>
<td>VOC input (tons)</td>
<td></td>
</tr>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
</tbody>
</table>

☑️ No deviation occurred in this quarter.  
☒ Deviation/s occurred in this quarter.  
Deviation has been reported on: ________________

Submitted by: _____________________________________________________

Title / Position: ____________________________________________________

Signature: ________________________________________________________

Date: ____________________________________________________________

Phone: ___________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

FESOP Quarterly Report

Source Name: Janco Engineered Products, LLC  
Source Address: 1217 East 7th Street, Mishawaka, Indiana 46544  
FESOP Permit No.: F141-42754-00593  
Facility: Pultrusion Operations  
Parameter: Single HAP usage  
Limit: Shall not exceed 9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:____________</th>
<th>YEAR:____________</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total HAP Usage (tons)</td>
<td>Total HAP Usage (tons)</td>
<td>Total HAP Usage (tons)</td>
</tr>
<tr>
<td></td>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
</tr>
</tbody>
</table>

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

Submitted by: ________________________________
Title / Position: ________________________________
Signature: ________________________________
Date: ________________________________
Phone: ________________________________
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

- □ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
- □ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
<th>Number of Deviations:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
<th>Number of Deviations:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permit Requirement (specify permit condition #)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------------------------------------------</td>
<td>---</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: _______________________________________________________
Title / Position: ___________________________________________________________
Date: ___________________________________________________________________
Phone: _________________________________________________________________
On April 8, 2020, Janco Engineered Products, LLC submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Janco Engineered Products, LLC relating to the operation of a stationary reinforced fiberglass/plastic composite tubing operation. Janco Engineered Products, LLC was issued its first FESOP (F141-36354-00593) on January 15, 2016.

Existing Approvals

The source was issued FESOP No. F 141-36354-00593 on January 15, 2016. There have been no subsequent approvals issued.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) Four (4) paint booths, painting plastic parts and products, each with a maximum capacity of 60 units per hour, each equipped with two (2) high volume, low pressure (HVLP) spray guns and each with dry filters as overspray control, each constructed in 2015, consisting of the following:

(1) One (1) paint booth, identified as PB1, exhausting to stack PBS1;

(2) One (1) paint booth, identified as PB2, exhausting to stack PBS2;

(3) One (1) paint booth, identified as PB3, exhausting to stack PBS3; and

(4) One (1) paint booth, identified as PB4, exhausting to stack PBS4.

(b) One (1) auto paint line, painting plastic parts and products, identified as PB5, constructed in 2015, with a maximum capacity of 16 pounds of coating per hour, equipped with two (2) high volume, low pressure spray guns and dry filters as overspray control, exhausting to stack PBS5.

(c) Fourteen (14) pultrusion operations, for manufacturing reinforced plastic composite tubing, with a combined total capacity of 214 pounds of resin per hour, constructed in 2015, no control, all exhausting to stack P1, consisting of the following:
(1) Three (3) dual stream pultrusion machines, identified as Line #1, Line #2, and Line #7; and

(2) Eleven (11) single stream pultrusion machine, identified as Lines #3, #4, #5, #6, #8 through #14.

(d) Grinding and machining operations, constructed in 2015, controlled by four (4) baghouses, identified as B1, B2, B3, or B4, venting outdoors, with B4 venting indoors, consisting of the following:

(1) Eight (8) Surface Grinders;
(2) One (1) Vibratory Deburring Bowl
(3) One (1) Pedestal Grinder
(4) Two (2) Abrasive Cut Off Saws;
(5) Eleven (11) Drill Presses;
(6) Four (4) Turret Lathes;
(7) One (1) Pin Saw
(8) Two (2) Grinder for Stabbers;
(9) One (1) Stabber Lathe;
(10) Two (2) Snuffer Sanders;
(11) One (1) Dual Head Saw;
(12) Two (2) Band Saws;
(13) One (1) Zipcut Abrasive Saw;
(14) Three (3) Lathes;
(15) One (1) Lathe Machine;
(16) One (1) Horizontal Band Saw;
(17) Four (4) Chop Saws; and
(18) Nine (9) Miscellaneous Saws.

In this renewal, the source recognized that B3 was not added to the unit description back in 2015, when the operation was constructed. B4 was constructed in 2020. Both baghouses were added to the unit description in 2020.

Insignificant Activities

The source also consists of the following insignificant activities:

(a) One (1) Abrasive Blast Cabinet, with a maximum capacity flow rate of 94 pounds per hour, constructed in 2015, using glass beads as the abrasive, controlled by dust collector, and exhausting indoors.

(b) Sixteen (16) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, constructed in 2015, consisting of the following:

(1) One (1) curing oven rated at 0.526 million British thermal units per hour, identified as CO1;

(2) Fourteen (14) curing ovens rated at 0.6 million British thermal units per hour each, identified as curing oven 1 through curing oven 14; and

(3) One (1) heater rated at 0.16 million British thermal units per hour.

(c) One (1) Epoxy Adhesive Coating Station, identified as ACS1, adhesive is flow coated to pre-manufactured FRP tubes, constructed in 2015, with a maximum capacity of 100 units per hour, no control and exhausting inside.
(d) Ten (10) Epoxy Winders, identified as EW1 - EW10, with continuous spools of fiber that are dip coated, constructed in 2015, with a total capacity of 400 units per hour, no control and exhausting inside.

(e) Maintenance cleaning tanks using non-VOC and non-HAP solvent, constructed in 2015.

### Enforcement Issue

There are no enforcement actions pending.

### Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

### County Attainment Status

The source is located in St. Joseph County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO2</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O3</td>
<td>Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM2.5</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM2.5 standard.</td>
</tr>
<tr>
<td>PM10</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO2</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO2 standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) **Ozone Standards**

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) **PM2.5**

St. Joseph County has been classified as attainment for PM2.5. Therefore, direct PM2.5, SO2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) **Other Criteria Pollutants**

St. Joseph County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.
The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

### Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹,₂</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>202.00</td>
<td>201.92</td>
<td>201.86</td>
<td>0.02</td>
<td>3.90</td>
<td>142.36</td>
<td>3.28</td>
<td>17.51</td>
<td>18.43</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM₁₀, PM₂.₅, and VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM₁₀, PM₂.₅, and VOC emissions to less than Title V major source thresholds. Therefore, the source will be issued a FESOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other regulated air pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source will be issued FESOP Renewal because the source will limit HAP emissions to less than the Title V major source threshold levels. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) subject to the provisions of 326 IAC 2-7.
Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this FESOP renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

<table>
<thead>
<tr>
<th>Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)</th>
<th>PM$^1$</th>
<th>PM$_{10}$$^1$</th>
<th>PM$_{2.5}$$^1$, 2</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^3$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>202.00</td>
<td>56.74</td>
<td>56.68</td>
<td>0.02</td>
<td>3.90</td>
<td>&lt;83.65</td>
<td>3.28</td>
<td>&lt;10</td>
<td>&lt;25</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
</tbody>
</table>

1Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."
2PM$_{2.5}$ listed is direct PM$_{2.5}$.
3Single highest source-wide HAP.
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable to this source and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-8 (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset), and 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines 40 CFR 60, Subpart TTT and 326 IAC 12, are not included in the permit for this source, because the paint booths are not coating plastic parts for business machines.

(b) The requirements of the New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities 40 CFR 60, Subpart VVV and 326 IAC 12, are not included in the permit for this source, because the process is associated with manufacturing tubing using a process similar to filament winding and is not polymeric coating of supporting substrates.
There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations 40 CFR 63, Subpart HHHHHH and are not included in the permit for this source, since this source does not use Methylene Chloride (MeCl) to perform paint stripping and the paint booths do not do surface coating for motor vehicles or mobile equipment.

(e) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State rule applicability for this source has been reviewed as follows:

326 IAC 1-5-2 (Emergency Reduction Plans)
The source is subject to 326 IAC 1-5-2.

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the Potential to Emit After Issuance section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

HAP Minor Source Limits
In order to render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable, the Permittee shall comply with the following:

(a) The usage of any single HAP by the fourteen (14) pultrusion operations, shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The usage of any combination of HAPs by the fourteen (14) pultrusion operations shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.
These are existing limits and no change has been made in this renewal.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 2-8-4 (FESOP) and 326 IAC 20 (Hazardous Air Pollutants)
FESOP applicability is discussed under the Potential to Emit After Issuance section of this document.

FESOP PM10 and PM2.5 Limit(s)
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) The PM10 emissions from each baghouse, identified as B1, B2, and B3 shall not exceed 1.37 pounds per hour.

(b) The PM10 emissions from the baghouse identified as B4, shall not exceed 0.46 pounds per hour.

(c) The PM2.5 emissions from each baghouse, identified as B1, B2, and B3, shall not exceed 1.37 pounds per hour.

(d) The PM2.5 emissions from the baghouse, identified as B4, shall not exceed 0.46 pounds per hour.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

These are new limits because of the addition of the two baghouses.

FESOP VOC Limit(s)
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) The total VOC input, including coatings, dilution solvents, and cleaning solvents, to the paint booths, identified as PB1, PB2, PB3, and PB4, shall not exceed 40 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The VOC input, including coatings, dilution solvents, and cleaning solvents, to the auto paint line, identified as PB5, shall be less than 25 tons combined per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

These are existing limits and no change has been made in this renewal.
FESOP HAP Limit(s)

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) The usage of any single HAP by the fourteen (14) pultrusion operations shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The usage of any combination of HAPs by the fourteen (14) pultrusion operations shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

These are existing limits and no change has been made in this renewal.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2).

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source (located in St. Joseph County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide PTE of PM is 10 tons per year or more. Therefore, this source is subject to the requirements of 326 IAC 6.5-1-2 because the source-wide actual emissions of PM can be 10 tons per year or more.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
This source is not subject to 326 IAC 6-3-2 because it is subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in St. Joseph County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.
Four (4) Paint Booths (PB1, PB2, PB3, PB4)

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(h), particulate from paint booths, identified as PB1, PB2, PB3, and PB4 and auto paint line, identified as PB5, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

This is an existing limit and there are no changes made in this renewal.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the paint booths identified as PB1, PB2, PB3, and PB4 were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions is less than twenty-five (25) tons per year, each.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9(a)(1) the paint booths identified as PB1, PB2, PB3, and PB4 are not subject to the requirements of 326 IAC 8-2-9 because this source coats plastic parts and is located in St. Joseph county, therefore 326 IAC 8-2-9 is not applicable.

Auto Paint line (PB5)

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(h), particulate from the auto paint line, identified as PB5, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

This is an existing limit and there are no changes made in this renewal.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
This auto paint line, identified as PB5, were constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year and the auto paint line, identified as PB5, is not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from the auto paint line, identified as PB5, to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable.

In order to render the requirements of 326 IAC 8-1-6 not applicable, Permittee shall comply with the following:

(1) The VOC input, including coatings, dilution solvents, and cleaning solvents, to auto paint line, identified as PB5, shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

This is an existing limit and there are no changes made in this renewal.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9(a)(1) the auto paint line, identified as PB5, is not subject to the requirements of 326 IAC 8-2-9 because this source coats plastic parts and is located in St. Joseph county, therefore 326 IAC 8-2-9 is not applicable.

Abrasive Blast Cabinet
326 IAC 6.5 PM Limitations Except Lake County
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the abrasive blast cabinet shall not exceed three-hundredth (0.03) grain per dry standard cubic foot (dscf).

This is an existing limit and there are no changes made in this renewal.

Pultrusion Operations
326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the pultrusion operations were constructed after January 1, 1980, they are not subject to
the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions is less than twenty-
five (25) tons per year.

326 IAC 6.5 PM Limitations Except Lake County
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the abrasive blast cabinet shall not
exceed three-hundredth (0.03) grain per dry standard cubic foot (dscf).

Natural Gas-Fired Combustion Units
326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 1-2-59, the natural gas combustion units are not subject to the requirements of 326
IAC 6-3, since liquid and gaseous fuels and combustion air are not considered part of the process weight.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
This natural gas combustion units are not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to
emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, these natural gas combustion units were constructed after January 1, 1980, they are not
subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than
twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the natural gas combustion units, because this source
does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron
cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to the natural gas combustion units, since this unit is not a
blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-
1(a)(2).

Grinding and Machining Operations and Abrasive Blasting Cabinet

326 IAC 6.5 PM Limitations Except Lake County
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the grinding and machining operations
and abrasive blasting cabinet shall not exceed three-hundredth (0.03) grain per dry standard cubic foot
(dscf), each.

This is an existing limit and there are no changes made in this renewal.

Epoxy Adhesive Coating Station (ACS1)
326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, this Epoxy Adhesive Coating Station was constructed after January 1, 1980, it is not subject
to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-
five (25) tons per year.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-8 are required to assure that sources can demonstrate compliance with
all applicable state and federal rules on a continuous basis. All state and federal rules contain
compliance provisions, however, these provisions do not always fulfill the requirement for a continuous
demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific
conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in
the permit. The Compliance Determination Requirements in Section D of the permit are those conditions
that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.

(a) The Compliance Monitoring Requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Emission Unit</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dry Filters</td>
<td>Paints Booths and Auto Paint line</td>
<td>Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekly observations shall be made of the overspray from the stacks.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Baghouse (B1)</td>
<td>Grinding and Machining Operation</td>
<td>Visible emission notations</td>
<td>Daily</td>
<td>Verify whether emissions are normal or abnormal</td>
</tr>
<tr>
<td>Baghouse (B2)</td>
<td>Grinding and Machining Operation</td>
<td>Visible emission notations</td>
<td>Daily</td>
<td>Verify whether emissions are normal or abnormal</td>
</tr>
<tr>
<td>Baghouse (B3)</td>
<td>Grinding and Machining Operation</td>
<td>Visible emission notations</td>
<td>Daily</td>
<td>Verify whether emissions are normal or abnormal</td>
</tr>
<tr>
<td>Baghouse (B4)</td>
<td>Grinding and Machining Operation</td>
<td>Baghouse inspections</td>
<td>Semi-annual</td>
<td>Verify that it is operated and maintained per manufacturer’s specifications</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the dry filters and Baghouses (B1, B2, B3, and B4) for the paint booths, auto paint line and Grinding and Machining Operation must operate properly to assure compliance with 326 IAC 6-5.

*Baghouse (B4) vents indoors, which would not allow for visible emission notations.

Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes were made to conditions contained previously issued permits/approvals (these changes may include Title I changes):
(1) The source added another baghouse to the already existing Grinding and Machining Operation. B3 was added in 2015 along with B1 and B2 but it was not added to the unit description. B4 was constructed in 2020.

Grinding and machining operations, constructed in 2015, controlled by two (2) four (4) baghouses, identified as B1, B2, B3, or B4 venting to the atmosphere outdoors, with B4 venting indoors, consisting of the following:

<table>
<thead>
<tr>
<th>Conclusion and Recommendation</th>
</tr>
</thead>
</table>

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 8, 2020. Additional information was received on December 11, 2020.

The operation of this stationary reinforced fiberglass/plastic composite tubing operation shall be subject to the conditions of the attached proposed FESOP Renewal No. 141-42754-00593.

The staff recommends to the Commissioner that the FESOP Renewal be approved.

<table>
<thead>
<tr>
<th>IDEM Contact</th>
</tr>
</thead>
</table>

(a) If you have any questions regarding this permit, please contact Nicholas Walters, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-9513 or (800) 451-6027, and ask for Nicholas Walters or (317) 234-9513.

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/)

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/2356.htm](http://www.in.gov/idem/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).
## Appendix A: Emission Calculations

### Emission Summary

**Company Name:** Janco Engineered Products, LLC  
**Address City IN Zip:** 1217 East 7th Street, Mishawaka, IN 46544 
**Permit Number:** 141-42754-00593  
**Reviewer:** Nicholas Walters

### Emission Unit

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Four (4) Paint Booths</td>
<td>23.64</td>
<td>23.64</td>
<td>23.64</td>
<td>-</td>
<td>-</td>
<td>86.88</td>
<td>-</td>
<td>0.01</td>
<td>3.50E-03 Ethylbenzene</td>
</tr>
<tr>
<td>Auto Paint Line</td>
<td>8.60</td>
<td>8.60</td>
<td>8.60</td>
<td>-</td>
<td>-</td>
<td>35.70</td>
<td>-</td>
<td>0.83</td>
<td>0.70 Toluene</td>
</tr>
<tr>
<td>Pultrusion Operations</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Grinding and Machining Operations</td>
<td>165.19</td>
<td>165.19</td>
<td>165.19</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>3.28</td>
<td>0.07 Hexane</td>
</tr>
<tr>
<td>Abrasive Blast Cabinet</td>
<td>4.12</td>
<td>4.12</td>
<td>4.12</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.07</td>
<td>0.30</td>
<td>0.30</td>
<td>0.02</td>
<td>3.90</td>
<td>0.21</td>
<td>3.28</td>
<td>0.07</td>
<td>0.07 Hexane</td>
</tr>
<tr>
<td>Epoxy Adhesive Coating Station</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>2.05</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Epoxy Winders</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Fugitive Emissions</td>
<td>0.38</td>
<td>0.08</td>
<td>0.02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>202.00</strong></td>
<td><strong>201.92</strong></td>
<td><strong>201.86</strong></td>
<td><strong>0.02</strong></td>
<td><strong>3.90</strong></td>
<td><strong>142.36</strong></td>
<td><strong>3.28</strong></td>
<td><strong>18.43</strong></td>
<td><strong>17.51 Styrene</strong></td>
</tr>
</tbody>
</table>

### Limited Potential to Emit (tons/year)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Four (4) Paint Booths</td>
<td>23.64</td>
<td>23.64</td>
<td>23.64</td>
<td>-</td>
<td>-</td>
<td>40</td>
<td>-</td>
<td>0.01</td>
<td>3.50E-03 Ethylbenzene</td>
</tr>
<tr>
<td>Auto Paint Line</td>
<td>8.60</td>
<td>8.60</td>
<td>8.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.83</td>
<td>0.70 Toluene</td>
</tr>
<tr>
<td>Pultrusion Operations</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Grinding and Machining Operations</td>
<td>165.19</td>
<td>20.00</td>
<td>20.00</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>17.51</td>
<td>9.00</td>
</tr>
<tr>
<td>Abrasive Blast Cabinet</td>
<td>4.12</td>
<td>4.12</td>
<td>4.12</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.07</td>
<td>0.30</td>
<td>0.30</td>
<td>0.02</td>
<td>3.90</td>
<td>0.21</td>
<td>3.28</td>
<td>0.07</td>
<td>0.07 Hexane</td>
</tr>
<tr>
<td>Epoxy Adhesive Coating Station</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>2.05</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Epoxy Winders</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Fugitive Emissions</td>
<td>0.38</td>
<td>0.08</td>
<td>0.02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>202.00</strong></td>
<td><strong>56.74</strong></td>
<td><strong>56.68</strong></td>
<td><strong>0.02</strong></td>
<td><strong>3.90</strong></td>
<td><strong>&lt;83.65</strong></td>
<td><strong>3.28</strong></td>
<td><strong>9.92</strong></td>
<td><strong>9.00</strong></td>
</tr>
</tbody>
</table>
## Appendix A: Emissions Calculations

### VOC and Particulate

From Surface Coating Operations

### Four (4) Paint Booths, identified as PB1 - PB4

**Company Name:** Janco Engineered Products, LLC  
**Address City IN Zip:** 1217 East 7th Street, Mishawaka, IN 46544  
**Permit Number:** 141-42754-00593  
**Reviewer:** Nicholas Walters

### Material Density (Lb/Gal) and Weight %

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (units/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Booth 1</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Devthane 379 White 2 Part</td>
<td>11.00</td>
<td>23.500%</td>
<td>0.0%</td>
<td>23.5%</td>
<td>0.0%</td>
<td>61.00%</td>
<td>0.01200</td>
<td>60.000</td>
<td>2.59</td>
<td>2.59</td>
<td>1.86</td>
<td>44.67</td>
<td>8.15</td>
<td>6.63</td>
<td>75%</td>
</tr>
<tr>
<td>Polane Reducer R6K18</td>
<td>7.31</td>
<td>100.000%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00000</td>
<td>0.00400</td>
<td>60.000</td>
<td>7.31</td>
<td>7.31</td>
<td>1.75</td>
<td>42.11</td>
<td>7.68</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td>MEK</td>
<td>6.71</td>
<td>100.000%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00000</td>
<td>0.00220</td>
<td>60.000</td>
<td>6.71</td>
<td>6.71</td>
<td>0.89</td>
<td>21.26</td>
<td>3.88</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td><strong>Total PB1:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Booth 2</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Devthane 389 Neutral 2 Part</td>
<td>10.80</td>
<td>30.000%</td>
<td>0.0%</td>
<td>30.0%</td>
<td>0.0%</td>
<td>54.00%</td>
<td>0.01200</td>
<td>60.000</td>
<td>3.24</td>
<td>3.24</td>
<td>2.33</td>
<td>55.99</td>
<td>10.22</td>
<td>5.96</td>
<td>75%</td>
</tr>
<tr>
<td>Polane Reducer R6K18</td>
<td>7.31</td>
<td>100.000%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00000</td>
<td>0.00400</td>
<td>60.000</td>
<td>7.31</td>
<td>7.31</td>
<td>1.75</td>
<td>42.11</td>
<td>7.68</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td>Devoe T9 Thinner</td>
<td>7.68</td>
<td>100.000%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00000</td>
<td>0.00030</td>
<td>60.000</td>
<td>7.68</td>
<td>7.68</td>
<td>0.14</td>
<td>3.32</td>
<td>0.61</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td>MEK</td>
<td>6.71</td>
<td>100.000%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00000</td>
<td>0.00220</td>
<td>60.000</td>
<td>6.71</td>
<td>6.71</td>
<td>0.89</td>
<td>21.26</td>
<td>3.88</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td><strong>Total PB2:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Booth 3</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13E1 Grey Epoxy Mix</td>
<td>7.42</td>
<td>38.600%</td>
<td>0.0%</td>
<td>38.6%</td>
<td>0.0%</td>
<td>57.50%</td>
<td>0.00400</td>
<td>60.000</td>
<td>2.86</td>
<td>2.86</td>
<td>0.69</td>
<td>16.50</td>
<td>3.01</td>
<td>1.20</td>
<td>75%</td>
</tr>
<tr>
<td>81C9 Gloss Varnish</td>
<td>7.50</td>
<td>53.000%</td>
<td>0.0%</td>
<td>53.0%</td>
<td>0.0%</td>
<td>47.00%</td>
<td>0.01200</td>
<td>60.000</td>
<td>3.98</td>
<td>3.98</td>
<td>2.86</td>
<td>68.69</td>
<td>12.54</td>
<td>2.78</td>
<td>75%</td>
</tr>
<tr>
<td>13 CO Epoxy Polyester Catalyst</td>
<td>9.41</td>
<td>40.000%</td>
<td>0.0%</td>
<td>40.0%</td>
<td>0.0%</td>
<td>60.00%</td>
<td>0.00300</td>
<td>60.000</td>
<td>7.68</td>
<td>7.68</td>
<td>0.14</td>
<td>21.26</td>
<td>3.88</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td>MEK</td>
<td>6.71</td>
<td>100.000%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00000</td>
<td>0.00220</td>
<td>60.000</td>
<td>6.71</td>
<td>6.71</td>
<td>0.89</td>
<td>21.26</td>
<td>3.88</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td><strong>Total PB3:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Booth 4</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Devthane 389 Neutral 2 Part</td>
<td>10.80</td>
<td>30.000%</td>
<td>0.0%</td>
<td>30.0%</td>
<td>0.0%</td>
<td>54.00%</td>
<td>0.01200</td>
<td>60.000</td>
<td>3.24</td>
<td>3.24</td>
<td>2.33</td>
<td>55.99</td>
<td>10.22</td>
<td>5.96</td>
<td>75%</td>
</tr>
<tr>
<td>Polane Reducer R6K18</td>
<td>7.31</td>
<td>100.000%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00000</td>
<td>0.00400</td>
<td>60.000</td>
<td>7.31</td>
<td>7.31</td>
<td>1.75</td>
<td>42.11</td>
<td>7.68</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td>Devoe T9 Thinner</td>
<td>7.68</td>
<td>100.000%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00000</td>
<td>0.00030</td>
<td>60.000</td>
<td>7.68</td>
<td>7.68</td>
<td>0.14</td>
<td>3.32</td>
<td>0.61</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td>MEK</td>
<td>6.71</td>
<td>100.000%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00000</td>
<td>0.00220</td>
<td>60.000</td>
<td>6.71</td>
<td>6.71</td>
<td>0.89</td>
<td>21.26</td>
<td>3.88</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td><strong>Total PB4:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Total Potential to Emit:**  
Add worst case coating to all solvents

### METHODOLOGY

- **Pounds of VOC per Gallon Coating less Water** = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- **Potential VOC Pounds per Hour** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- **Potential VOC Pounds per Day** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- **Potential VOC Tons per Year** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (1 ton/2000 lbs)
- **Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

### Total Potential to Emit

- **PM Control Efficiency:** 95.00%
- **Uncontrolled Combined** 86.88 23.64
- **Controlled Combined** 86.88 1.18
- **Combined Limited** 40 NA

---

**Add worst case coating to all solvents**

---

**Potential VOC tons per year**  
**Particulate Potential (ton/yr)**
## Appendix A: Emission Calculations

### HAP Emission Calculations from Surface Coating

**Four (4) Paint Booths, identified as PB1 - PB4**

**Company Name:** Janco Engineered Products, LLC  
**Address City IN Zip:** 1217 East 7th Street, Mishawaka, IN 46544  
**Permit Number:** 141-42754-00593  
**Reviewer:** Nicholas Walters

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lbs/gal)</th>
<th>Material Usage (lbs/hr)</th>
<th>Flash Off Factor</th>
<th>Weight % HDI</th>
<th>Weight % Toluene</th>
<th>Weight % Xylene</th>
<th>Weight % MIBK</th>
<th>Weight % Ethylbenzene</th>
<th>HDI Emissions (tons/yr)</th>
<th>Toluene Emissions (tons/yr)</th>
<th>Xylene Emissions (tons/yr)</th>
<th>MIBK Emissions (tons/yr)</th>
<th>Ethylbenzene Emissions (tons/yr)</th>
<th>Total Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Booth 1</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Devthane 379 White 2 Part</td>
<td>11.00</td>
<td>0.0120</td>
<td>1.0000</td>
<td>1.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Polane Reducer R6K18</td>
<td>7.31</td>
<td>0.0040</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>MEK</td>
<td>6.71</td>
<td>0.0022</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Booth 2</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Devthane 398 Neutral 2 Part</td>
<td>10.80</td>
<td>0.0120</td>
<td>1.0000</td>
<td>1.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Polane Reducer R6K18</td>
<td>7.31</td>
<td>0.0040</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Devoe T9 Thinner</td>
<td>7.68</td>
<td>0.0003</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>10.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>MEK</td>
<td>6.71</td>
<td>0.0022</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Booth 3</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13E1 Grey Epoxy Mix</td>
<td>7.42</td>
<td>0.0040</td>
<td>1.0000</td>
<td>0.00%</td>
<td>5.00%</td>
<td>10.00%</td>
<td>10.00%</td>
<td>5.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>81C9 Gloss Varnish</td>
<td>7.50</td>
<td>0.0120</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>13 CO Epoxy Polyester Catalyst</td>
<td>9.41</td>
<td>0.0030</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>MEK</td>
<td>6.71</td>
<td>0.0022</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Booth 4</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Devthane 389 Neutral 2 Part</td>
<td>10.80</td>
<td>0.0120</td>
<td>1.0000</td>
<td>1.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Polane Reducer R6K18</td>
<td>7.31</td>
<td>0.0040</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Devoe T9 Thinner</td>
<td>7.68</td>
<td>0.0003</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>10.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>MEK</td>
<td>6.71</td>
<td>0.0022</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**METHODOLOGY**

HAPS emission rate (tons/yr) = Material Usage (lbs/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
### Emissions Calculations

**Auto Paint Line, Identified as PB5**

**Company Name:** Janco Engineered Products, LLC  
**Address City IN Zip:** 1217 East 7th Street, Mishawaka, IN 46544  
**Permit Number:** 141-42754-00593  
**Reviewer:** Nicholas Walters

### Material Specifications

| Material                  | Density (lbs/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Material Usage (lbs/hr) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC (pounds per hour) | Potential VOC (pounds per day) | Potential VOC (tons per year) | Particulate Potential (tons/yr) | lbs VOC/gal solids | Transfer Efficiency |
|---------------------------|-------------------|------------------------------------|----------------|------------------|----------------|---------------------------------|------------------------|---------------------------------------------|----------------------------------|----------------------------------|-------------------------------|-----------------------------|-------------------------------|-------------------------|----------------------|----------------------|
| HS No. F63HK-A5341-1169  | 9.49              | 30.00%                             | 0.0%           | 30.0%            | 0.0%           | 59.00%                         | 8.00                   | 2.85                                          | 2.85                             | 2.40                             | 57.60                        | 10.51                       | 6.13                     | 4.83                   | 75%                  |
| V66V55 Polane catalyst    | 9.44              | 25.00%                             | 0.0%           | 25.0%            | 0.0%           | 70.00%                         | 3.00                   | 2.36                                          | 2.36                             | 0.75                             | 18.00                        | 3.29                        | 2.46                     | 3.37                   | 75%                  |
| R6K18 Polane Reducer      | 7.31              | 100.00%                            | 0.0%           | 100.0%           | 0.0%           | 0.00                           | 3.00                   | 7.31                                         | 7.31                             | 3.00                             | 72.00                        | 13.14                      | 0.00                     | N/A                    | 75%                  |
| MEK                       | 6.71              | 100.00%                            | 0.0%           | 100.0%           | 0.00           | 0.00                           | 2.00                   | 6.71                                         | 6.71                             | 2.00                             | 48.00                        | 8.76                       | 0.00                     | N/A                    | 100%                 |

**PM Contol Efficiency** 98.00%

**Potential to Emit**

**Add worst case coating to all solvents**

**Uncontrolled**

<table>
<thead>
<tr>
<th></th>
<th>8.15</th>
<th>195.60</th>
<th>35.70</th>
<th>8.60</th>
</tr>
</thead>
<tbody>
<tr>
<td>Limited TPY</td>
<td></td>
<td></td>
<td>&lt;25</td>
<td></td>
</tr>
</tbody>
</table>

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used
## Appendix A: Emission Calculations

### HAP Emission Calculations from Surface Coating

#### Auto Paint Line, Identified as PB5

**Company Name:** Janco Engineered Products, LLC  
**Address City IN Zip:** 1217 East 7th Street, Mishawaka, IN 46544  
**Permit Number:** 141-42754-00593  
**Reviewer:** Nicholas Walters

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lbs/gal)</th>
<th>Material Usage (lbs/hr)</th>
<th>Flash Off Factor</th>
<th>Weight % HDI</th>
<th>Weight % Toluene</th>
<th>Weight % Cumene</th>
<th>HDI Emissions (tons/yr)</th>
<th>Toluene Emissions (tons/yr)</th>
<th>Cumene Emissions (tons/yr)</th>
<th>Total Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>HS No. F63HX-A5341-1169</td>
<td>9.49</td>
<td>8.00</td>
<td>1.0000</td>
<td>0.00%</td>
<td>2.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.70</td>
<td>0.00</td>
<td>0.70</td>
</tr>
<tr>
<td>V66V55 Polane catalyst</td>
<td>9.44</td>
<td>3.00</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>1.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.13</td>
</tr>
<tr>
<td>R6K18 Polane Reducer</td>
<td>7.31</td>
<td>3.00</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>MEK</td>
<td>6.71</td>
<td>2.00</td>
<td>1.0000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

| Single HAPs | Toluene | 0.70 | 0.13 | 0.83 |

### METHODOLOGY

HAPS emission rate (tons/yr) = Material Usage (lbs/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
### Appendix A: Emissions Calculations

#### Pultrusion Operations

**Company Name:** Janco Engineered Products, LLC  
**Address City IN Zip:** 1217 East 7th Street, Mishawaka, IN 46544  
**Permit Number:** 141-42754-00593  
**Reviewer:** Nicholas Walters

**PTE for all pultrusion operations**

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Monomer VOC</th>
<th>Pounds per unit</th>
<th>Units per hour</th>
<th>Pounds VOC per hour</th>
<th>Pounds VOC per day</th>
<th>Tons of VOC per Year</th>
<th>PM tons per year</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hetron Resin FR1540</td>
<td>12.23</td>
<td>30.0%</td>
<td>0.0010</td>
<td>4553</td>
<td>1.37</td>
<td>32.78</td>
<td>5.98</td>
<td>0.00</td>
<td>100.00%</td>
</tr>
<tr>
<td>P920 Resin Solution</td>
<td>9.18</td>
<td>28.0%</td>
<td>0.0016</td>
<td>4553</td>
<td>2.04</td>
<td>48.96</td>
<td>8.93</td>
<td>0.00</td>
<td>100.00%</td>
</tr>
<tr>
<td>N714 Additive</td>
<td>9.18</td>
<td>65.0%</td>
<td>0.0002</td>
<td>4553</td>
<td>0.59</td>
<td>14.21</td>
<td>2.59</td>
<td>0.00</td>
<td>100.00%</td>
</tr>
<tr>
<td>Acetone</td>
<td>6.59</td>
<td>0.0%</td>
<td>0.0001</td>
<td>4553</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100.00%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>4.00</strong></td>
<td><strong>95.9</strong></td>
<td><strong>17.51</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>100.00%</td>
</tr>
</tbody>
</table>

**VOC/Styrene Emissions:** 17.51

The worst case resin and catalyst are rarely used. Styrene emissions are based on 100 percent of the styrene content being emitted. AP-42, Table 4.4-2 allows for a weight percent emission factor of 4 - 7% of starting monomer emitted.

### METHODOLOGY

Potential VOC Pounds per Hour = Pounds of Material (lbs/unit) * Maximum (unit/hr) * Weight Percent Volatile
Potential VOC Pounds per Day = Potential VOC (lbs / hr) * (24 hrs / 1 day)
Potential VOC Tons per Year = Potential VOC (lbs / hr) * (8760 hr/yr) * (1 ton / 2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (lbs/unit) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Total = Sum of all worst case coatings and solvents used
Appendix A: Emission Calculations

Grinding and Machining Operation Controlled by One (1) of Four (4) Baghouses Identified as B1, B2, B3, and B4

Company Name: Janco Engineered Products, LLC
Address City IN Zip: 1217 East 7th Street, Mishawaka, IN 46544
Permit Number: 141-42754-00593
Reviewer: Nicholas Walters

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Control Efficiency</th>
<th>Grain Loading per Actual Cubic foot of Outlet Air**</th>
<th>Gas or Air Flow Rate (acfm.)</th>
<th>Potential to Emit before Controls (lbs/hr)</th>
<th>Potential to Emit before Controls (tons/yr)</th>
<th>Emission Rate after Controls (lbs/hr)</th>
<th>Emission Rate after Controls (tons/yr)</th>
<th>Limited* (lb/hr)</th>
<th>Limited* (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>B1</td>
<td>98.50%</td>
<td>0.0018</td>
<td>11000</td>
<td>11.31</td>
<td>49.56</td>
<td>0.17</td>
<td>0.74</td>
<td>1.37</td>
<td>6.00</td>
</tr>
<tr>
<td>B2</td>
<td>98.50%</td>
<td>0.0018</td>
<td>11000</td>
<td>11.31</td>
<td>49.56</td>
<td>0.17</td>
<td>0.74</td>
<td>1.37</td>
<td>6.00</td>
</tr>
<tr>
<td>B3</td>
<td>98.50%</td>
<td>0.0018</td>
<td>11000</td>
<td>11.31</td>
<td>49.56</td>
<td>0.17</td>
<td>0.74</td>
<td>1.37</td>
<td>6.00</td>
</tr>
<tr>
<td>B4</td>
<td>99%</td>
<td>0.00088</td>
<td>5000</td>
<td>3.77</td>
<td>16.52</td>
<td>0.04</td>
<td>0.17</td>
<td>0.46</td>
<td>2.00</td>
</tr>
<tr>
<td><strong>TOTAL:</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>37.71</strong></td>
<td><strong>165.19</strong></td>
<td><strong>0.55</strong></td>
<td><strong>2.40</strong></td>
<td><strong>4.57</strong></td>
<td><strong>20.00</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Control Efficiency</th>
<th>Grain Loading per Actual Cubic foot of Outlet Air</th>
<th>Gas or Air Flow Rate (acfm.)</th>
<th>Potential to Emit before Controls (lbs/hr)</th>
<th>Potential to Emit before Controls (tons/yr)</th>
<th>Emission Rate after Controls (lbs/hr)</th>
<th>Emission Rate after Controls (tons/yr)</th>
<th>Limited* (lb/hr)</th>
<th>Limited* (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>B1</td>
<td>98.50%</td>
<td>0.003</td>
<td>11000</td>
<td>18.86</td>
<td>82.59</td>
<td>0.28</td>
<td>1.24</td>
<td>2.28</td>
<td>10.00</td>
</tr>
<tr>
<td>B2</td>
<td>98.50%</td>
<td>0.003</td>
<td>11000</td>
<td>18.86</td>
<td>82.59</td>
<td>0.28</td>
<td>1.24</td>
<td>2.28</td>
<td>10.00</td>
</tr>
<tr>
<td><strong>TOTAL:</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>37.71</strong></td>
<td><strong>165.19</strong></td>
<td><strong>0.57</strong></td>
<td><strong>2.48</strong></td>
<td><strong>4.57</strong></td>
<td><strong>20.00</strong></td>
</tr>
</tbody>
</table>

Notes:
B1, B2, and B3 will be vented outside to the atmosphere.
B4 will be vented inside the building.
All grinders, sanders and equipment of this type will be controlled by one of these baghouses.

Methodology
Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr)(ton/2000 lb)
Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr)(ton/2000 lb)
New Grain Loading per Actual Cubic foot of Outlet Air for B1/B2/B3= (((Original Total Uncontrolled PTE * 0.3)*(1-control efficiency))*2000/8760)*7000/60)/Gas or Air Flow Rate
New Grain Loading per Actual Cubic foot of Outlet Air for B4= (((Original Total Uncontrolled PTE * 0.1)*(1-control efficiency))*2000/8760)*7000/60)/Gas or Air Flow Rate

* Limited at 87.89% control efficiency
**Baghouses B1, B2, and B3 each control about 30% of the total emissions, and Baghouse B4 controls about 10% of the total emissions. There are no additional grinders, so the uncontrolled PTE has not changed.
Appendix A: Emission Calculations

One (1) Abrasive Blasting Cabinet

Company Name: Janco Engineered Products, LLC
Address City IN Zip: 1217 East 7th Street, Mishawaka, IN 46544
Permit Number: 141-42754-00593
Reviewer: Nicholas Walters

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM/lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.700</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.700</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.860</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td></td>
</tr>
</tbody>
</table>

Table 2 - Density of Abrasives (lb/ft3)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>99</td>
</tr>
</tbody>
</table>

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

<table>
<thead>
<tr>
<th>Internal diameter, in</th>
<th>30</th>
<th>40</th>
<th>50</th>
<th>60</th>
<th>70</th>
<th>80</th>
<th>90</th>
<th>100</th>
</tr>
</thead>
<tbody>
<tr>
<td>1/8</td>
<td>28</td>
<td>35</td>
<td>42</td>
<td>49</td>
<td>55</td>
<td>63</td>
<td>70</td>
<td>77</td>
</tr>
<tr>
<td>3/16</td>
<td>65</td>
<td>80</td>
<td>94</td>
<td>107</td>
<td>122</td>
<td>135</td>
<td>149</td>
<td>165</td>
</tr>
<tr>
<td>1/4</td>
<td>109</td>
<td>138</td>
<td>168</td>
<td>195</td>
<td>221</td>
<td>255</td>
<td>280</td>
<td>309</td>
</tr>
<tr>
<td>5/16</td>
<td>205</td>
<td>247</td>
<td>292</td>
<td>354</td>
<td>377</td>
<td>420</td>
<td>462</td>
<td>507</td>
</tr>
<tr>
<td>3/8</td>
<td>285</td>
<td>355</td>
<td>417</td>
<td>477</td>
<td>540</td>
<td>600</td>
<td>657</td>
<td>720</td>
</tr>
<tr>
<td>7/16</td>
<td>385</td>
<td>472</td>
<td>560</td>
<td>645</td>
<td>755</td>
<td>820</td>
<td>905</td>
<td>940</td>
</tr>
<tr>
<td>1/2</td>
<td>503</td>
<td>615</td>
<td>725</td>
<td>835</td>
<td>945</td>
<td>1050</td>
<td>1160</td>
<td>1265</td>
</tr>
<tr>
<td>5/8</td>
<td>820</td>
<td>990</td>
<td>1170</td>
<td>1336</td>
<td>1510</td>
<td>1680</td>
<td>1850</td>
<td>2030</td>
</tr>
<tr>
<td>3/4</td>
<td>1140</td>
<td>1420</td>
<td>1670</td>
<td>1915</td>
<td>2160</td>
<td>2400</td>
<td>2630</td>
<td>2880</td>
</tr>
<tr>
<td>1</td>
<td>2030</td>
<td>2460</td>
<td>2900</td>
<td>3340</td>
<td>3780</td>
<td>4200</td>
<td>4640</td>
<td>5060</td>
</tr>
</tbody>
</table>

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

\[ FR = FR1 \times \frac{ID}{ID1}^2 \times \frac{D}{D1} \]

\[ D = \text{Density of abrasive (lb/ft3)} \text{ From Table 2} = 99 \]
\[ D1 = \text{Density of sand (lb/ft3)} = 99.0 \]
\[ ID = \text{Actual nozzle internal diameter (in)} = 0.188 \]
\[ ID1 = \text{Nozzle internal diameter (in)} \text{ from Table 3} = 0.188 \]

Flow Rate (FR) (lb/hr) = 94 per nozzle

Uncontrolled Emissions (E, lb/hr)

\[ EF = \text{emission factor (lb PM/lb abrasive)} \text{ From Table 1} = 0.010 \]
\[ FR = \text{Flow Rate (lb/hr)} = 94 \]
\[ w = \text{fraction of time of wet blasting} = 0.00 \%
\[ N = \text{number of nozzles} = 1.00 \]

\[ \text{Uncontrolled Emissions} = 0.9 \text{ lb/hr} \]
\[ \text{4.1 ton/yr} \]

\[ \text{Controlled Emissions} = 0.009 \text{ lb/hr} \]
\[ 0.041 \text{ ton/yr} \]

METHODOLOGY


Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)
E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)
**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Company Name:** Janco Engineered Products, LLC  
**Source Address:** 1217 East 7th Street, Mishawaka, IN 46544  
**Permit Number:** 141-42754-00593  
**Reviewer:** Nicholas Walters

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>MM BTU/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Curing Oven (CO1)</td>
<td>0.53</td>
</tr>
<tr>
<td>Curing Oven 1</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 2</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 3</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 4</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 5</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 6</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 7</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 8</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 9</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 10</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 11</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 12</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 13</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven 14</td>
<td>0.6</td>
</tr>
<tr>
<td>Heater</td>
<td>0.16</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Heat Input Capacity</th>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>MMBtu/hr</td>
<td>mmBtu</td>
<td>MMCF/yr</td>
</tr>
<tr>
<td>Total</td>
<td>9.1</td>
<td>1020</td>
<td>78.1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.07</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.30</td>
</tr>
<tr>
<td>Direct PM2.5</td>
<td>7.6</td>
<td>0.30</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.02</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>3.90</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.21</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>3.28</td>
</tr>
</tbody>
</table>

Emission Factors are based on normal firing.  

**MMBtu = 1,000,000 Btu**  
**MMCF = 1,000,000 Cubic Feet of Gas**  
**Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-01-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03**  
**Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu**  
**Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton**

### Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>0.07</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>8.2E-05</td>
<td>4.7E-05</td>
<td>2.9E-03</td>
<td>0.07</td>
<td>1.3E-04</td>
<td>0.07</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>2.1E-04</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>2.0E-05</td>
<td>4.3E-05</td>
<td>5.5E-05</td>
<td>1.5E-05</td>
<td>8.2E-05</td>
<td>2.1E-04</td>
</tr>
</tbody>
</table>

Methodology is the same as above.  
**The five highest organic and metal HAPs emission factors are provided above.**  
**Additional HAPs emission factors are available in AP-42, Chapter 1.4.**
### Appendix A: Emissions Calculations
#### VOC and Particulate From Surface Coating Operations

**One (1) Adhesive Coating Station, ACS1**

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Janco Engineered Products, LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address City</td>
<td>1217 East 7th Street, Mishawaka, IN 46544</td>
</tr>
<tr>
<td>Permit Number:</td>
<td>141-42754-00593</td>
</tr>
<tr>
<td>Reviewer:</td>
<td>Nicholas Walters</td>
</tr>
</tbody>
</table>

#### Material Properties

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H20 &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Epoxy Adhesive</td>
<td>9.31</td>
<td>0.50%</td>
<td>0.00%</td>
<td>0.50%</td>
<td>0.00%</td>
<td>98.0%</td>
<td>0.07</td>
<td>100.000</td>
<td>0.047</td>
<td>0.047</td>
<td>0.33</td>
<td>7.82</td>
<td>1.43</td>
<td>0.00</td>
<td>0.05</td>
<td>100%</td>
</tr>
<tr>
<td>Epoxy Adhesive Hardener</td>
<td>12.01</td>
<td>0.17%</td>
<td>0.00%</td>
<td>0.17%</td>
<td>0.00%</td>
<td>99.8%</td>
<td>0.07</td>
<td>100.000</td>
<td>0.020</td>
<td>0.020</td>
<td>0.14</td>
<td>3.43</td>
<td>0.63</td>
<td>0.00</td>
<td>0.02</td>
<td>100%</td>
</tr>
<tr>
<td>Acetone Solvent for Cleanup</td>
<td>6.61</td>
<td>100%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.05</td>
<td>100.000</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>n/a</td>
<td>n/a</td>
<td>100%</td>
</tr>
<tr>
<td><strong>Sub-total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.47</td>
<td>11.25</td>
<td>2.05</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Add worst case coating to all solvents

**METHODOLOGY**

Transfer Efficiency = 100% for Manual Flow Coating

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Material does not contain hazardous air pollutants
## Appendix A: Emissions Calculations
### VOC and Particulate
#### From Surface Coating Operations

**Epoxy Winders (EW1-EW10)**

**Company Name:** Janco Engineered Products, LLC  
**Address City IN Zip:** 1217 East 7th Street, Mishawaka, IN 46544  
**Permit Number:** 141-42754-00593  
**Reviewer:** Nicholas Walters

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile H2O &amp; Organics</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC pounds per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resin</td>
<td>9.76</td>
<td>0.00%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.00%</td>
<td>0.00100</td>
<td>400</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
</tr>
<tr>
<td>Catalyst</td>
<td>7.51</td>
<td>0.00%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.00%</td>
<td>0.00050</td>
<td>400</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
</tr>
<tr>
<td>Acetone</td>
<td>6.59</td>
<td>100.00%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00%</td>
<td>0.00065</td>
<td>400</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
</tr>
</tbody>
</table>

**Total Potential Emissions**  
Add worst case coatings to all epoxy use  
0.00  0.00  0.00  0.00

**METHODOLOGY**

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used
Appendix A: Emission Calculations
HAP Emission Calculations from Surface Coating

Epoxy Winders EW1-EW10

Company Name: Janco Engineered Products, LLC
Address City IN Zip: 1217 East 7th Street, Mishawaka, IN  46544
Permit Number: 141-42754-00593
Reviewer: Nicholas Walters

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Resin</td>
<td>9.76</td>
<td>0.00100</td>
<td>400.00</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Catalyst</td>
<td>7.51</td>
<td>0.00050</td>
<td>400.00</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Acetone</td>
<td>6.59</td>
<td>0.00065</td>
<td>400.00</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Total Potential Emissions

<table>
<thead>
<tr>
<th>Material</th>
<th>Single HAP</th>
<th>Combo HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Appendix A: Emission Calculations

Fugitive Dust Emissions - Paved Roads

Company Name: Janco Engineered Products, LLC
Address City IN Zip: 1217 East 7th Street, Mishawaka, IN 46544
Permit Number: 141-42754-00593
Reviewer: Nicholas Walters

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way distance (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant)</td>
<td>6.0</td>
<td>1.0</td>
<td>6.0</td>
<td>1.0</td>
<td>6.0</td>
<td>10000</td>
<td>1.894</td>
<td>11.4</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>1.0</td>
<td>1.0</td>
<td>1.0</td>
<td>1.0</td>
<td>1.0</td>
<td>10000</td>
<td>1.894</td>
<td>1.9</td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = 1.894 tons/trip
Average Miles Per Trip = 1.9 miles/trip

Unmitigated Emission Factor, $E_f = \left( k \cdot (sL)^{0.91} \cdot (W)^{1.02} \right)$ (Equation 1 from AP-42 13.2.1)

where $k =$
- PM: 0.011
- PM10: 0.0022
- PM2.5: 0.00054

$W =$
- 1.0 tons = average vehicle weight (provided by source)

$sL =$
- 9.7 g/m² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f \cdot \left[ 1 - \left( \frac{p}{4N} \right) \right]$ (Equation 2 from AP-42 13.2.1)

where $p =$
- 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)

$N =$
- 365 days per year

Unmitigated Emission Factor, $E_f =$
- PM: 0.087
- PM10: 0.017
- PM2.5: 0.0043

Mitigated Emission Factor, $E_{ext} =$
- PM: 0.080
- PM10: 0.016
- PM2.5: 0.0039

Dust Control Efficiency = 50%

<table>
<thead>
<tr>
<th>Process</th>
<th>Unmitigated PTE of PM (tons/yr)</th>
<th>Unmitigated PTE of PM10 (tons/yr)</th>
<th>Unmitigated PTE of PM2.5 (tons/yr)</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
<th>Controlled PTE of PM (tons/yr)</th>
<th>Controlled PTE of PM10 (tons/yr)</th>
<th>Controlled PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant)</td>
<td>0.08</td>
<td>0.01</td>
<td>0.01</td>
<td>0.03</td>
<td>0.01</td>
<td>0.00</td>
<td>0.02</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>0.03</td>
<td>0.01</td>
<td>0.00</td>
<td>0.03</td>
<td>0.01</td>
<td>0.00</td>
<td>0.01</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Totals = 0.42

Methodology

Total Weight received per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (miles/day) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Average Vehicle Weight Per Trip (tons/day) = [Maximum Trip Weight (tons/day)] / [Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/day) = [Maximum one-way miles (miles/day)] / [SUM(Maximum trips per day (trip/day)]
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * (1 - Dust Control Efficiency)

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit
January 6, 2021

Nicholas Mark
Janco Engineered Products, LLC
1217 E 7th St
Mishawaka, IN 46544

Re: Public Notice
Janco Engineered Products, LLC
Permit Level: FESOP Renewal
Permit Number: 141-42754-00593

Dear Mr. Mark:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM’s online searchable database: http://www.in.gov/apps/idem/caats/. Choose Search Option by Permit Number, then enter permit 42754

and

IDEM’s Virtual File Cabinet (VFC): http://www.IN.gov/idem. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Mishawaka-Penn-Harris Public Library, 209 Lincolnway East in Mishawaka, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.
Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Nicholas Walters, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-9513 or dial (317) 234-9513.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 6, 2021

To: Mishawaka-Penn-Harris Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Janco Engineered Products, LLC
Permit Number: 141-42754-00593

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

January 6, 2021
Janco Engineered Products, LLC
141-42754-00593

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.
### Mail Code 61-53

**FACSIMILIE OF PS Form 3877**

**Mail Code 61-53**

<table>
<thead>
<tr>
<th>IDEM Staff</th>
<th>TAWEAVER 1/6/2021</th>
<th>Janco Engineered Products LLC 141-42754-00593 (draft)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name and address of Sender</td>
<td>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</td>
<td>Type of Mail: CERTIFICATE OF MAILING ONLY</td>
</tr>
</tbody>
</table>

**Name and address of Sender**

<table>
<thead>
<tr>
<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>Nicholas Mark Janco Engineered Products LLC 1217 E 7th St Mishawaka IN 46544 (Source CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td>Peter Giczewski Janco Engineered Products LLC 1217 E 7th St Mishawaka IN 46544 (RO CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>3</td>
<td>Mishawaka City Council and Mayors Office 600 E. 3rd Street Mishawaka City Hall Mishawaka IN 46546 (Local Official)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>4</td>
<td>Mishawaka-Penn-Harris Public Library 209 Lincolnway E Mishawaka IN 46544-2084 (Library)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>5</td>
<td>Mr. Wayne Faida South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>6</td>
<td>St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>7</td>
<td>Mark Espich St. Joseph County Health Department 227 W Jefferson Blvd South Bend IN 46601 (Health Department)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>8</td>
<td>Polly Misher D &amp; B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>9</td>
<td>Jeff Mayes News-Dispatch 422 Franklin St Michigan City IN 46360 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>10</td>
<td>Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Total number of pieces Listed by Sender**

| Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |

---

FACSIMILIE OF PS Form 3877