

10300 Industrial Rd. Holland, OH 43528

July 18, 2018



Attention: Regional Hearing Clerk (E-19J)
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

JCBGI Holland, OH – Docket no. CAA-05-2017-0034 Supplemental Environmental Project

Attn: Regional Hearing Clerk (E-19J)

Johnson Controls, Inc. Power Solutions (JCPS) is hereby submitting the enclosed Signed Supplemental Environmental Project in response to Consent Agreement and Final Order under Docket no. CAA-05-2017-003.

Below is the requested information for the Supplemental Environmental Project listed in the Consent Agreement and Final Order. In addition, Appendix are listed and attached to show compliance to the Supplemental Environmental Project.

a. Detailed description on the SEP as completed - Appendix 1

b. Sample records of Indusoft historical differential pressure compliance data from each of the six APB units. – Appendix 2

c. Description of any operating problems and the actions taken to correct the problems – Appendix 3

d. Itemized cost of goods and services used to complete the SEP documented by copies of invoices, purchase orders or cancelled checks that specifically identify and itemize the individual cost of the goods and services. - Appendix 4a & 4b

e. Certification that the Respondent has completed the SEP in compliance with this CAFO; and – Appendix 5

f. Description of the environmental and public health benefits resulting from the SEP (quantify the benefits and pollution reductions, if feasible. **Appendix - 6**

Proceeding Under Sections 113(a)(1) and (3) and 114(a)(1) of the Clean Air Act 42 U.S.C. }} 7413(a)(1) and (3) and 7414(a)(1).



10300 Industrial Rd. Holland, OH 43528

In addition, Appendix are listed and attached to show compliance to the Supplemental Environmental Project.

Please call me at (419) 861-6261 if you have questions or need additional information.

Sincerely,

Jeffrey Bendelewski, Environmental Manager

Johnson Controls, Inc. Power Solutions

Encl.

cc:

Jeramy W LeMieux – JCPS, Milwaukee Debbie Hastings - JCPS, Milwaukee Joe Green - JCPS, Toledo Miguel Barajas - JCPS, Toledo

Detailed description on the SEP as completed - Appendix 1

Supplemental Environmental Project is in reference to Docket No. CAA-05-2017-0034. This project consist of installing Analog gauges with electrical transmitting capabilities to allow the facility to continuously track differential pressure of six APB air control units through InduSoft. The gauges will be wired to the APB panel where it will be tied into an I/O card where the differential pressure can be accessed by the network. InduSoft Screen were created by Matrix Technology and Johnson Controls Toledo Engineering to display differential pressure. Below is addition information of this SEP.

APB Air Monitoring Project - \$19,234.06

| APB Monitoring Project | | | | | | |
|----------------------------------|---|--|------------------------|--|--|--|
| Items Action Issue Comment | | Description of Discussion | Action by | | | |
| 1. | С | Six (6) Auto Post Burner (APB1 -6) units each with an ancillary Air Control Unit (ACU) (A1-A6). Each ACU has two (2) Dwyer magnehelic gauges. One gauge displaying differential pressure and the other gauge displaying vacuum. These gauges are not connected to any automation system. See pictures in project folder. | None | | | |
| 2. | С | Replace all twelve (12) existing magnehelic gauge with new transmitter type. | None | | | |
| | А | Jeff to provide Dwyer part number of device already being used in the facility. (Dwyer 605 series) JCI to purchase devices. | JCI-Done | | | |
| | А | Specify new Dwyer magnehelic gauges with transmitter for integration into local data monitoring system. (Dwyer Series 605) | Matrix – Done | | | |
| 3. | С | All new gauges to be wired back to Stackoff Conveyor Panel. JCI to provide and/or coordinate device purchasing and device and wiring installation. | None | | | |
| | A | Jeff & Matt to supply electrical drawings for Stackoff Conveyor Panel. | JCI – Critical Path | | | |
| | Α | Update panel electrical drawings for connections of twelve new Dwyer transmitting gauges. | Matrix | | | |
| | Α | | Matrix - Done | | | |

| | A | Specify hardware required. Analog input card(s), terminal blocks, fuses blocks, etc (Listed in Scope of Work) Scope of Work for electrical updates / device installation. | Matrix-Done None |
|---|---|--|------------------------|
| 4. | С | Update APB PLC code. | None |
| | A | Jeff & Matt to supply PLC code for Stackoff Conveyor PLC for review. | JCI – Critical Path |
| | Α | Jeff (Matt) to send pics of Stackoff Conveyor panel. (Pics received) | JCI-Done |
| | A | Update Stackoff Conveyor PLC code for addition of these devices. I.e. hardware additions, tags, scaling code No process control code changes required for these devices. This update is process monitoring and trending data in the HMI. | Matrix |
| Tomas de la companya | Ą | IO checkout and commissioning of devices. - Contact Jeff and Matt 1-2 days prior to onsite visit for hardware and software coordination. | Matrix |
| 5. | С | InduSoft HMI updates required. 1. Navigation on Overview screen to APB data screen 2. Create APB 1-6 data screen with display areas for the twelve new devices. | None |
| | Ά | JCI will provide office space and JCI laptop computer with access to PLC network and HMI application for onsite work. | JÖl |
| | Å | Jeff to supply screen shots of HMI for reference. | JCI-Done |
| | Ä | Update Indusoft HMI application with the following. 1. Add Navigation on Overview screen to APB data screen 2. Create APB 1-6 data screen with display areas for the twelve new devices. | Matrix |
| 6. | С | Discussed and agreed. Design and onsite time for this work to be charged to issued PO (PO10047133) for Matrix project number I55207.1. | Note |

Gauges:

6 - Dwyer 605-3 for Differential pressure

| 605-3 | Differential pressure indicating transmitter, range 0-3.0" w.c., max, pressure 2 psi (13.79 kPa), ±0.5% electrical accuracy, ±2% mechanical accuracy. | Same Day* | \$266.00 | <u>Order</u> ∰ |
|-------|---|--------------|----------|----------------|
|-------|---|--------------|----------|----------------|

6 - Dwyer 605-50 for Vacuum

| 605-50 | Differential pressure indicating transmitter, range 0-50" w.c., max. pressure 11 psi (75.8 kPa), ±0.5% electrical accuracy, ±2% mechanical accuracy. | Same Day | \$266.00 | Order # |
|--------|--|-------------|----------|---------|
|--------|--|-------------|----------|---------|

http://www.dwyer-inst.com/Product/Pressure/DifferentialPressure/Transmitters/Series605

Additional Supplemental Environmental Project(s) to cover the commitment of the CAFO of \$26,000 dollars:

AGM Central Vacuum Continuous Monitoring Project -

Was to put the AGM Central Vacuum Baghouse on a Continuous Monitoring System through InduSoft. This project was done internally and the cost for this project is only documented as material cost. The Environmental and Health benefits of this project is the unit will automatically shut down if the primary or secondary media goes out of permitted range. This unit runs 24/7 and is the Vacuum system for half of the facility.

Completed \$1,960.68

RADCO Repair/Upgrade project -

RADCO is a Recirculating Air Dust Collector in which process air from the equipment is ran through 2 sets of filter banks for filtration and a percentage of that filtered process air is reintroduce into the plant to help with the heating of the facility. The recirculating aspect of these units needed repairs and upgrades due to the fact that a lot of the equipment was obsolete and needed to be fabricated or upgrade logic to be accessed on the facilities network. Below is addition description of what work was completed and what work is still in progress:

Completed - \$22,300

- Replace damaged and missing linkage on abort, mixed air and intake dampers.
- Adjust and check damper motor operations.
- Test and adjust all 154 fault pressure switches.

- Calibrate Magnehelic gauges (Also completed quarterly during baghouse inspections).
- Check supply air plenum pressure and temperature sensors.
- Service in-line intake air fans. Service Buffalo fans.

Routing through our Capital - \$65,950.00

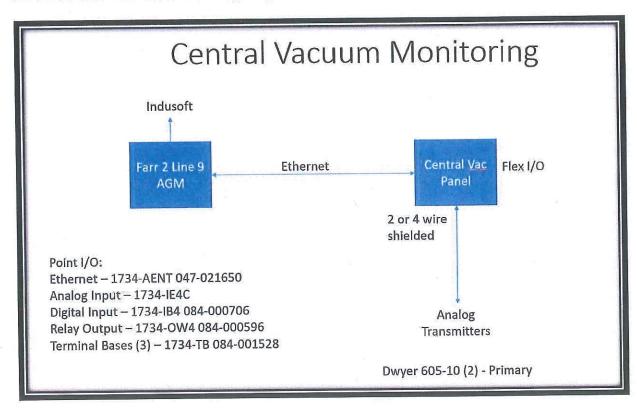
- Update current installation of air particulate sampling system for 11 RADCO units.
- Supply, install and commission a Unitronics Vision 700 PLC with required I/O and ancillaries, programmed to operate the Particulate sampling system such that it steps through each of the 11 RADCO zones by switching interposing relays to operate the currently installed solenoid valves (each zone will be sampled for a programmable time period to be determined during system commissioning).
- Rebuild all the solenoid sampling valve in both cabinets.
- Purchase and install two new ADR-1500 Dust Monitors to replace the outdated 1200s units.
- The supplied system will utilize the current wiring from the old particulate system.
- The Particulate Sensors outputs will be monitored for its output for each zone and on
 detecting a high particle level an LED lamp associated with the zone will flash on the
 local panel door in the RADCO room and a second LED lamp will also flash in the
 Engineers Office (current incandescent lamps in both locations will be replaced with
 LED lamps).
- If a high level is signaled, the lamp associated with that zone will remain flashing until either, the lamp is acknowledged by a reset push button in the RADCO room or by a successive number of low particulate readings for that zone has cycled through.
- The proposed system will be built on a panel back plate and PA System will install this back plate within the existing RADCO room panel and wire tit e existing sampling wiring

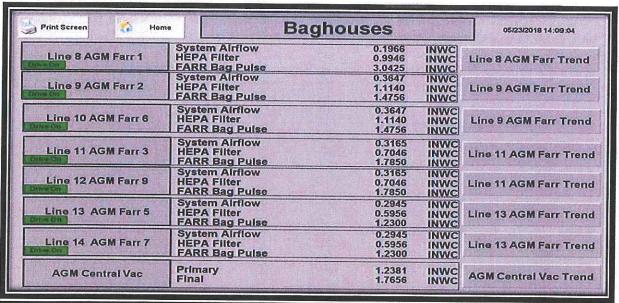
Sample records of Indusoft historical differential pressure compliance data from each of the six APB units. - Appendix 2

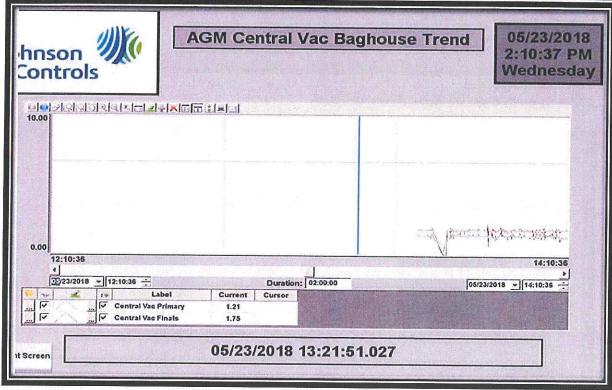
APB Air Monitoring Project:

| A-1 APB Lines 1,2 | Primary Vacuum Flow | 0.1 INWC | A-1 Trend |
|--------------------|------------------------|----------|-----------|
| -2 APB Lines 3,4,5 | Primary Vacuum Flow | 0.3 INWC | A-2 Trend |
| -3 APB Lines 13,14 | Primary Vacuum Flow | 0.2 INWC | A-3 Trend |
| A-4 APB Lines 8,9 | Primary Vacuum Flow | 0.2 INWC | A-4 Trend |
| -5 APB Lines 10,11 | Primary Vacuum Flow | 0.4 INWC | A-5 Trend |
| A-6 APB Lines 12 | Primary Vacuum Flow | 0.1 INWC | A-6 Trend |
| | | | |

AGM Central Vacuum Monitoring Project:







Description of any operating problems and the actions taken to correct the problems - Appendix 3:

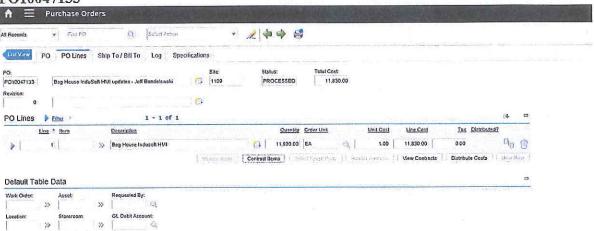
Having issues with intermitted outage of the Vacuum Flow Reading on the APB InduSoft display as displayed in Appendix 2. We are going to change the type of wiring to better protect transmission to the panel from other frequencies in the facility.

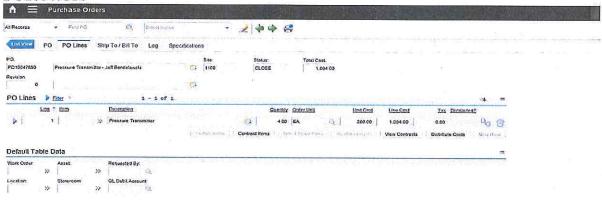
Itemized cost of goods and services used to complete the SEP documented by copies of invoices, purchase orders or cancelled checks that specifically identify and itemize the individual cost of the goods and services:

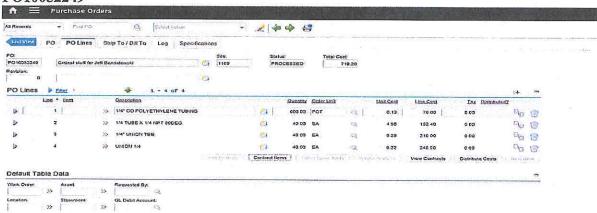
Appendix 4a:

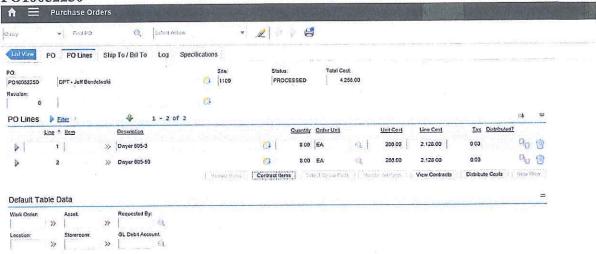
| PO# | Description | Cost USD |
|------------|--|-----------|
| PO10047133 | Programming for InduSoft of APB Monitoring | 11,830.00 |
| PO10047850 | Pressure Transmitter for APB Monitoring | 1,064.00 |
| PO10052249 | Hoses and Fittings | 719.20 |
| PO10052250 | Gauges | 4,256.00 |
| PO10052256 | Wiring and electrical | 1,364.86 |
| PO10047851 | AGM Central Vac Monitoring Project | 1,960.68 |
| PO10043683 | RADCO Upgrade Project | 22,300.00 |
| | Total | 43,494.74 |

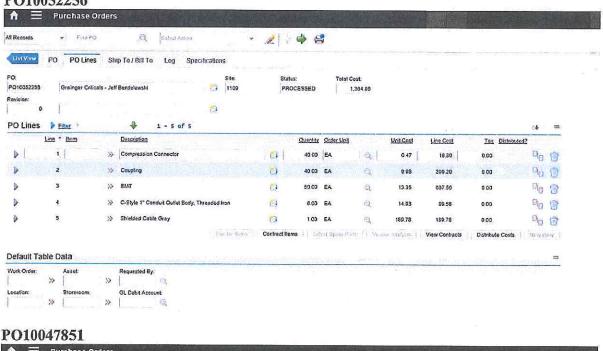
Appendix 4b:

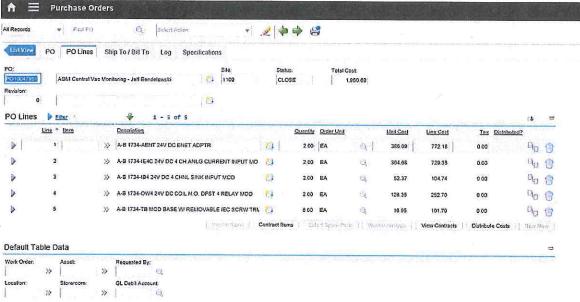


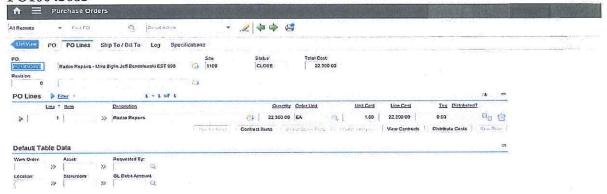












Certification that the Respondent has completed the SEP in compliance with this CAFO; and – Appendix 5

This Document was signed by the Plant Manager, Miguel Barajas and was made aware of all activities responsible to complete these projects. The signed document is attached.

Description of the environmental and public health benefits resulting from the SEP (quantify the benefits and pollution reductions, if feasible. Appendix - 6

APB Air Monitoring Project — By allowing the facility to continuously track the differential pressure across all six APB air control units, expedites corrective action for any out of range issues. In the past, the units were logged once a day for record of differential pressure and maybe a few spot checks throughout the day. These upgrades reduce the Potential to Emit from out of range emissions to the environment and protecting human health.

AGM Central Vacuum Baghouse - By allowing the facility to continuously track the differential pressure of the AGM Central Vacuum, expedites corrective action for any out of range issues. In the past, the units were logged once a day for record of differential pressure and maybe a few spot checks throughout the day. These upgrades reduce the Potential to Emit from out of range emissions to the environment and protecting human health.

RADCO Repair/Upgrade project — The completed portion of this project allows the facility to operate the RADCO system as it was intended. Which is to "reuse" a portion of filtered process air back into the facility and reduce the Potential to Emit to the outside environment and protecting human health. In addition, also reduces the facility's footprint from an heating prospective and ensures that if there is an issue with one of the facility's eleven RADCO units, it will alarm out, avoiding further release to the inside/outside of the facility.



10300 Industrial Rd. Holland, OH 43528

July 18, 2018

JCBGI Holland, OH – Docket no. CAA-05-2017-0034 Certification that Respondent has completed the Supplemental Environmental Project in Compliance with this CAFO

I Miguel Barajas, certify that I am familiar with the information in this document and that, based on my inquiry of those individuals responsible for obtaining the information, it is true and complete to the best of my knowledge. I know that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Please call me at (419) 861-6206 if you have questions or need additional information.

Sincerely,

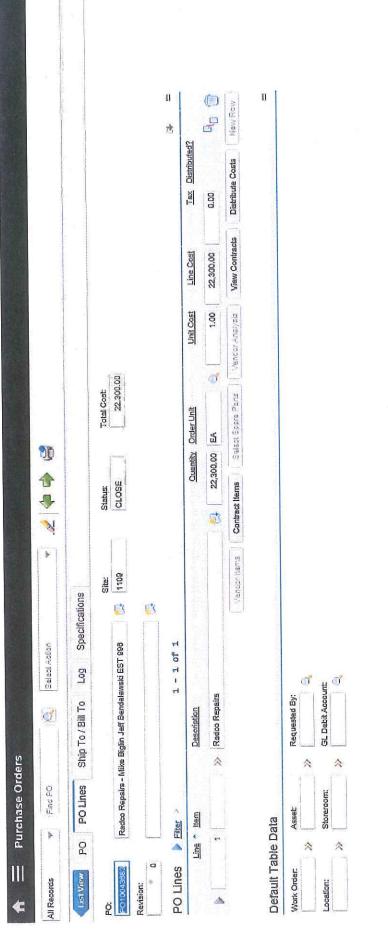
Miguel Barajas, Plant Manager

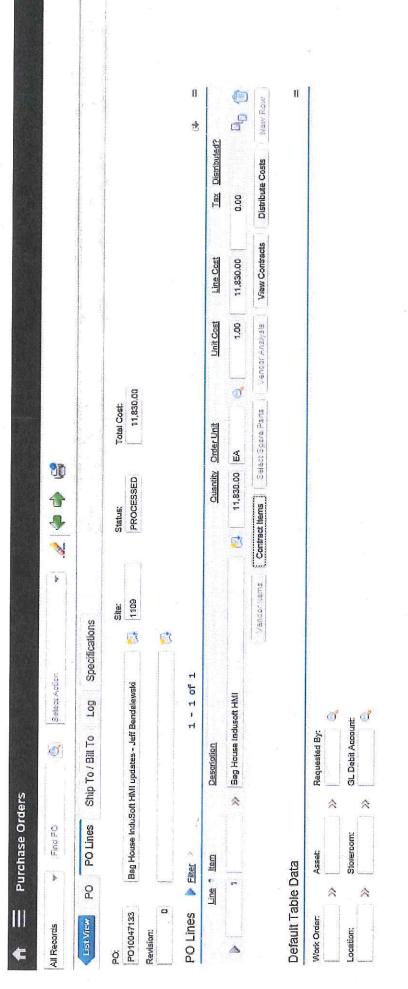
Johnson Controls, Inc. Power Solutions

Encl.

cc:

Jeramy W LeMieux – JCPS Milwaukee Debbie Hastings - JCPS, Milwaukee Joe Green - JCPS, Toledo Jeff Bendelewski - JCPS, Toledo





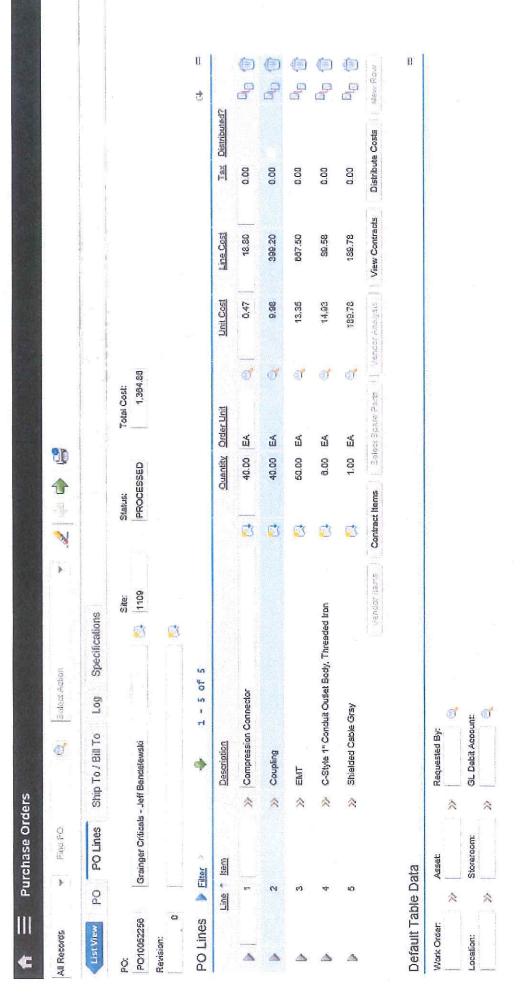




| Orden Asset: Requested By: | * | on: Storeroom: GL Debit Account: | |
|----------------------------|---|----------------------------------|--|
| Vork Order | | cation; | |







| | | · |
|---|---|---|
| | | |
| | | |
| | | |
| | , | |
| | | |
| · | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |