UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 07 2016

REPLY TO THE ATTENTION OF:

Matthew Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft federally enforceable state operating permit for Janco Engineered Products, LLC, permit number 141-36354-00593. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1.) Technical support document (TSD), appendix A, page 3, lists the ethylbenzene content of the 81C9 gloss varnish as 0% by weight. In a material safety data sheet (MSDS) included with the permit application, the 81C9 gloss varnish could contain between 0 to 5% by weight of ethylbenzenes. We request that you either recalculate the hazardous air pollutant (HAP) content of the varnish assuming an ethylbenzene content of 5% by weight or justify the use of 0% for this calculation.

2.) TSD, appendix A, page 6 calculates the pultrusion operations' styrene potential to emit. The calculation table lists the resin and catalyst that would result in the greatest styrene emissions from the pultrusion operations.

   a. As part of the calculation, the N714 additive is assumed to contain 55% styrene by weight. However, in an MSDS included with the application, the N714 additive is stated to contain 65% styrene by weight. We request that you verify the styrene content of the N714 additive and recalculate the HAP content as necessary.

   b. The Hetron resin FR1540 is assumed to contain 24.4% styrene by weight. The resin's MSDS, included with the application, states that the styrene content can vary between 20 to 30%. In another part of the same MSDS, the styrene content is listed as 24.35% (24.4% when rounded). We request that you either recalculate

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (100% Post-Consumer)

the HAP emissions assuming 30% styrene content or justify the use of 24.4% for this calculation.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

Genevieve Damico
Chief
Air Permits Section