

	No
--	----

Chemical	Criteria Pollutant Designation	CAS No.	L Value (mg/m ³)	E, maximum Hourly Emission Threshold (lb/hr)	Annual Emission Threshold (tpy)	Actual Hourly Increases (lb/hr)	Actual Annual Increase (tpy)	Meets Threshold?
<p>*Chemical List: acrolein, allyl chloride, ammonia (anhydrous), arsine, boron trifluoride, bromine, carbon disulfide, chlorine, chlorine dioxide, chlorine trifluoride, chloroacetaldehyde, chloropicrin, chloroprene, diazomethane, diborane, diglycidyl ether, dimethylhydrazine, ethyleneimine, ethyl mercaptan, fluorine, formaldehyde (anhydrous), hydrogen bromide, hydrogen chloride, hydrogen cyanide, hydrogen fluoride, hydrogen selenide, hydrogen sulfide, ketene, methylamine, methyl bromide, methyl hydrazine, methyl isocyanate, methyl mercaptan, nickel carbonyl, nitric acid, nitric oxide, nitrogen dioxide, oxygen difluoride, ozone, pentaborane, perchloromethyl mercaptan, perchloryl fluoride, phosgene, phosphine, phosphorus trichloride, selenium hexafluoride, stibine, liquified sulfur dioxide, sulfur pentafluoride, and tellurium hexafluoride.</p>								
<p>**These chemicals shall be handled at least 300 feet from the nearest property line and 600 feet from any off-plant receptor, and the cumulative amount of any of these chemicals resulting from one or more authorizations under this section (but not including permit authorizations) shall not exceed 500 pounds on the plant property and all listed chemicals shall be handled only in unheated containers operated in compliance with the United States Department of Transportation regulations (49 Code of Federal Regulations, Parts 171-178).</p>								

[Click here to go to the Rule Summary sheet.](#)

General Information

This sheet provides general rule information for both General Facility PBRs.

Instructions:

Please fill out all input / yellow cells unless marked optional. Attach the federal applicability review to the application for each project.
An optional supplemental information field has been provided at the end of this worksheet. This field should be used for demonstration of rule or policy compliance.

I. Project Information

Requested Information	Response
Company Name	J & H American Enclosures
Site Description	Polymer concrete enclosure manufacturer located in an industrial park in Alverado, Johnson County, Texas. Johnson County is non-attainment for 8
General Project Description	Polymer concrete enclosure manufacturer with potential to emit volatile organic compounds (VOC) into the atmosphere
I acknowledge that I am submitting an authorized TCEQ workbook and any necessary attachments. Except for inputting the requested data and adjusting row height, I have not changed the TCEQ application workbook in any way, including but not limited to changing formulas, formatting, content, or protections.	I agree
Please indicate which rule, or both, are applicable to this project:	Both
Does this project authorize a new facility, modify a New Source Review (NSR) Case-by-Case existing permitted facility, or both?	New Facility
Is this site only authorized under Permits by Rule?	Yes

II. General Rule Requirements for §106.261 and/or §106.262

Requested Information	Response
Has a §106.4 checklist or compliance demonstration been included in the documentation submitted to TCEQ?	Yes
Is this registration for construction of a facility authorized in another section of this chapter or for which a standard permit is in effect?	No
Is this registration for any change to any facility authorized under another section of this chapter or authorized under a standard permit?	No
Are facilities or changes located at least 100 feet from any recreational area or residence or other structure not occupied or used solely by the owner or operator of the facilities or the owner of the property upon which the facilities are located?	Yes
Are there any changes to or additions of any existing air pollution abatement equipment?	No
Will there be any visible emissions, except uncombined water, emitted to the atmosphere from any point or fugitive source in amounts greater than 5.0% opacity in any six-minute period?	No
Please include the following information for any pollution control equipment related to this registration: how the equipment operates, and the control efficiency achieved.	An Thermal Oxidizer (TO) will be installed with 100% capture efficiency and 99% destruction efficiency.

III. Associated Emission Increases

Any upstream and/or downstream actual emission increases that result from a project for which this PBR is claimed need to be authorized appropriately. Any associated upstream and/or downstream emissions authorized as part of the PBR claim will need to be included as part of the total new or increased emissions, unless: 1) these emissions stay below current authorized emission thresholds; 2) there is not a change to any underlying air authorizations for the applicable units associated with BACT, health and environmental impacts, or other representations (i.e. construction plans, operating procedures, throughputs, maximum emission rates, etc.); and 3) this claim is certified via PI-7 CERT or APD-CERT. Notwithstanding the exclusion of any upstream and/or downstream emissions under this PBR claim, the total of all emission increases, including upstream and/or downstream actual emission increases, are required to be part of the PBR registration to determine major new source review applicability under Title 30 TAC Chapter 116. The emission increases associated with the PBR claim and all upstream and/or downstream actual emission increases may not circumvent major new source review requirements under 30 TAC Chapter 116.

Requested Information	Response
Is this project related to physical or operational changes to facilities authorized under an NSR Case-by-Case permit?	No

IV. Hours of Operation

Project emission increases associated with a change to a facility that only result in an annual emissions increase can be authorized as part of the PBR claim if the following information is met: 1) the hourly emissions stay at or below current authorized emission thresholds; 2) there is not a change to any underlying air authorizations for the applicable units associated with BACT or health and environmental impacts; and 3) this claim is certified via PI-7 CERT. The annual emission increases associated with the PBR claim may not circumvent major new source review requirements under 30 TAC Chapter 116.

Requested Information	Response
Does this project include only annual increases for permitted facilities?	No

V. Federal Applicability

Complete separate federal permitting application materials to determine applicability of Nonattainment (NA) and Prevention of Significant Deterioration (PSD) applicability, including netting if applicable. Include this analysis in your permit application.

Requested Information	Response
Please select the county that this project is located in.	Johnson
County attainment status as of November 4, 2022:	This county has a nonattainment designation for ozone

If applicable, is this facility located within the portion of the county that is in nonattainment?		Yes	
PSD Applicability Summary			
Requested Information		Response	
Is this a named source?		No	
Is netting required for the PSD Analysis for this project?		No	
Pollutant	Project Increase (TPY)	Threshold (TPY)	PSD Review Required?
CO	0.444		
NO _x	0.097		
PM	0.151		
PM ₁₀	0.075		
PM _{2.5}	0.023		
SO ₂	0.0002		
Ozone (as VOC)	0.18		
Ozone (as NO _x)	0.097		
Pb			
H ₂ S			
TRS			
Reduced sulfur compounds (including H ₂ S)			
H ₂ SO ₄			
Fluoride (excluding HF)			
CO ₂ e			
Determination:			
Nonattainment Applicability Summary			
Is netting required for the nonattainment analysis for this project?		No	
Pollutant	Project Increase (TPY)	Threshold (TPY)	NA Review Required?
Ozone (as VOC)			
Ozone (as NO _x)			
Determination:			
Supplemental Information (Optional)			

[Click here to go to the §106.261 Checklist sheet.](#)

This sheet provides compliance demonstration and emission thresholds for 30 TAC §106.261.

Please fill out all input / yellow cells unless marked optional. Also, please note that emissions must be fully speciated and cannot have general categories listed (e.g

Are emission increases being authorized under §106.261 five tons per year or greater?	No
---	----

The company may submit a notification by March 31 of the following year summarizing all uses of this permit by rule in the previous calendar year.

Is this project an annual notification?	No
---	----

Are there new or increased emissions listed under §106.261(a)(2), including fugitives, less than or equal to 6.0 pounds per hour (lb/hr) and ten tons per year?	Yes
---	-----

Please select chemical and enter emission rates:

[illegible]

Are there new or increased emissions, including fugitives, less than or equal to 1.0 lb/hr of any chemical having a limit value (L) greater than 200 milligrams per cubic meter (mg/m³) as listed and referenced in Table 262 of 30 TAC § 106.262 relating to Facilities (Emission and Distance Limitations)?

Are there new or increased emissions, including fugitives, less than or equal to 1.0 lb/hr of any chemical not listed or referenced in Table 262?

Please enter the chemical name, L value (for chemicals listed in table 262), and emission rates:

If there is no L value available for the chemical, then leave the L value blank.

[illegible]

[Click here to go to the §106.262 Checklist sheet.](#)

This sheet provides the emissions summary from chemicals authorized under §106.261 and/or §106.262.

If the company is representing a different method to demonstrate compliance, please include a note next to the applicable chemical and attach additional sheets to the application.

[illegible][illegible]

The emission point summary table provided here is optional.

Please fill out the Emission Point Summary Table for the project emissions, including all emissions and rules being registered. Additional rows can be added if needed.

[illegible]

Maximum Operating Schedule	Hours/Day		Days/Week		Weeks/Year		Hours/Year		
Notes									

From: Camryn Appert
Sent: Monday, July 22, 2024 2:27 PM
To: Kevin Whitenight
Cc: Crystal Delacruz; Trishia McDonald; Amanda Marcks, P.E.
Subject: RE: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

Thank you, Kevin.

Have a great week!

Camryn Appert

Environmental Permit Specialist

Rule and Registrations Section | Air Permits Division | TCEQ Office of Air

Phone: (512) 239-0625

Email: camryn.appert@tceq.texas.gov

Mail: MC-161, P.O. Box 13087, Austin TX 78711-3087



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customersurvey

From: Kevin Whitenight <kwhitenight@esepartners.com>
Sent: Monday, July 22, 2024 11:01 AM
To: Camryn Appert <Camryn.Appert@tceq.texas.gov>
Cc: Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald
<Trishia.McDonald@tceq.texas.gov>; Amanda Marcks, P.E. <amarcks@esepartners.com>
Subject: RE: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

Hi Camryn,

There is no heat used in the curing process. The curing process is just waiting for the mold to dry. Since no heat is being used it was my understanding that 106.392 would not be applicable. Let me know if you have any questions.

Kevin

From: Camryn Appert <Camryn.Appert@tceq.texas.gov>
Sent: Monday, July 22, 2024 9:21 AM
To: Kevin Whitenight <kwhitenight@esepartners.com>
Cc: Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald
<Trishia.McDonald@tceq.texas.gov>; Amanda Marcks, P.E. <amarcks@esepartners.com>
Subject: RE: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

Good morning Kevin,

I discussed the project with Crystal (team leader) and Dara (technical specialist) and had a few additional questions regarding this project. Please address the following:

- Based on the process description, the resin mixture is poured into molds and then cured. Would PBR 106.392 be an appropriate authorization for the curing process or is the company not using heat?
 - Please provide justification for why PBR 106.392 is not being used to authorize the resin facilities.
 - If PBR 106.392 is applicable, please provide a demonstration of rule compliance.

Failure to submit all of the requested information by **July 24, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

Please feel free to call me if you have any questions.

Thank you,

Camryn Appert

Environmental Permit Specialist

Rule and Registrations Section | Air Permits Division | TCEQ Office of Air

Phone: (512) 239-0625

Email: camryn.appert@tceq.texas.gov

Mail: MC-161, P.O. Box 13087, Austin TX 78711-3087



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Camryn Appert

Sent: Monday, July 15, 2024 8:54 PM

To: Kevin Whitenight <kwhitenight@esepartners.com>

Cc: Amanda Marcks, P.E. <amarcks@esepartners.com>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>

Subject: RE: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

Hi Kevin,

Thanks for your call and responses. I'll look over everything and let you know if I have any more questions.

Have a great night!

Camryn Appert

Environmental Permit Specialist

Rule and Registrations Section | Air Permits Division | TCEQ Office of Air

Phone: (512) 239-0625

Email: camryn.appert@tceq.texas.gov

Mail: MC-161, P.O. Box 13087, Austin TX 78711-3087



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Kevin Whitenight <kwhitenight@esepartners.com>

Sent: Monday, July 15, 2024 2:31 PM

To: Camryn Appert <Camryn.Appert@tceq.texas.gov>

Cc: Amanda Marcks, P.E. <amarcks@esepartners.com>

Subject: RE: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

Hi Camryn,

Thanks for taking my call on Friday. Below are responses to your request for information. Let me know if you have any questions.

- Based on the process description, the emissions from the resin mixing process are controlled by a dust collector and regenerative thermal oxidizer (RTO). However, there are no EPNs or emission calculations associated with a dust collector or RTO. Will there be emissions associated with the dust collector or RTO? Or is the only control device at the site the flare (vapor incinerator)?
 - Please provide clarification on the control devices.
 - If there will be emissions from a dust collector and/or a RTO, please provide emission calculations and an updated emission summary.

Sorry for the confusion, there is two control devices. There is a dust collector (EPN: D-LDG Dry Material Loading) and a regenerative thermal oxidizer (EPN: VI – Vapor Incinerator). We will be changing the EPN name to represent the control device or emission point more accurately. The dust collector will now be EPN: DC-1 – Dust Collector and the regenerative thermal oxidizer will be EPN: RTO-1 – Regenerative Thermal Oxidizer.

- Furthermore, it is stated that there is a site flare that has an automatic ignition, with no periods of excess emissions. On the emission summary and in the emission calculations, it appears that

the flare emissions are emissions are represented at EPN: VI. This device is also referred to as a thermal oxidizer or vapor incinerator.

- Please clarify what the control device is that is represented under EPN: VI.

See above for clarification on the control devices.

- Please clarify what “no periods of excess emissions” means.

Simply means the company will not exceed the PBR emission rates.

- There are eight 10,000 lb capacity metal tanks at the site that are used to produce polymer concrete mix. However, the application does not address how these tanks will be authorized. Are the tanks authorized under PBR 106.472? Will there be emissions from the tanks and/or are they controlled?
 - Please confirm how the tanks are being authorized and if there are emissions associated the storage and mixing of the dry materials.

The 10,000 lb capacity tanks are considered mixing tanks which are authorized under PBR 106.261/262. PBR 106.472 is for the liquids loading operations and raw material storage totes (EPN: L-LDG Liquid Loading). The liquid loading operations will now be claimed (not registered) under PBR 106.472 and emission related to the activity will be authorized under 261/262 since they are being controlled by the RTO.

- The 261/262 workbook includes chemicals that are listed as “Unknown”, “Internt / Unknown”, and “Other”. These emissions will need to be speciated under the most appropriate designated pollutant and will need to be classified.
 - Please provide an updated 106.261/262 workbook that includes these emissions speciated appropriately with an actual chemical name.
 - Please provide clarification on what these chemicals are and provide justification for how they are being listed, if necessary.

Unknown and Internt have been removed from the 261/262 speciation and attached is a new updated 261/262 workbook.

- Additionally, the speciated VOC emissions from the workbook are 0.48 lb/hr and 0.51 tpy. However, the emission summary equals 0.16 lb/hr and 0.18 tpy VOC. Is the workbook conservatively estimating VOC emissions?
 - Please explain the discrepancy between the workbook and emission summary table VOC emissions.

I believe you need to add the HAPs emissions to the VOC as well. HAP emissions are not included in total VOC. EPNs related to the dust collector, fugitives and RTO will all be authorized under PBR 106.261/262.

From: Camryn Appert <Camryn.Appert@tceq.texas.gov>

Sent: Monday, July 1, 2024 4:18 PM

To: Amanda Marcks, P.E. <amarcks@esepartners.com>

Cc: Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Jason Binford <jason@esepartners.com>; Kevin Whitenight <kwhitenight@esepartners.com>

Subject: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Amanda,

I confirmed with management and your extension request has been approved.

Failure to submit all of the requested information by **July 12, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

I will also be out of office with no access to my phone or email July 2nd – 8th. I will return on July 9th and would be happy to answer any questions once I return. Otherwise, if there are any urgent questions that arise, please feel free to contact Trishia McDonald or Crystal Delacruz (both CC'd). Please note that the agency will be closed July 4th – 5th in observance of the holiday.

Have a great week and weekend!

Kind regards,

Camryn Appert

Environmental Permit Specialist

Rule and Registrations Section | Air Permits Division | TCEQ Office of Air

Phone: (512) 239-0625

Email: camryn.appert@tceq.texas.gov

Mail: MC-161, P.O. Box 13087, Austin TX 78711-3087



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Amanda Marcks, P.E. <amarcks@esepartners.com>

Sent: Monday, July 1, 2024 2:10 PM

To: Camryn Appert <Camryn.Appert@tceq.texas.gov>

Cc: Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Jason Binford <jason@esepartners.com>; Kevin Whitenight <kwhitenight@esepartners.com>

Subject: RE: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

Thanks Camryn. My team and I will look into this.

I am out of the office from July 3-5. Anyway we can respond by end of next week, July 12?

Amanda Marcks, P.E.
Compliance Business Unit Leader

ESE Partners, LLC
400 E. Royal Lane, Building 3, Suite 203
Irving, Texas 75039
O: 469.983.8600
M: 940.440.2435
E: amarcks@esepartners.com
www.esepartners.com

From: Camryn Appert <Camryn.Appert@tceq.texas.gov>
Sent: Monday, July 1, 2024 11:00 AM
To: Amanda Marcks, P.E. <amarcks@esepartners.com>
Cc: Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Jason Binford <jason@esepartners.com>; Kevin Whitenight <kwhitenight@esepartners.com>
Subject: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Amanda,

I have completed my technical review of this application and additional information will be required before I can continue. Please address the following:

- Based on the process description, the emissions from the resin mixing process are controlled by a dust collector and regenerative thermal oxidizer (RTO). However, there are no EPNs or emission calculations associated with a dust collector or RTO. Will there be emissions associated with the dust collector or RTO? Or is the only control device at the site the flare (vapor incinerator)?
 - Please provide clarification on the control devices.
 - If there will be emissions from a dust collector and/or a RTO, please provide emission calculations and an updated emission summary.

- Furthermore, it is stated that there is a site flare that has an automatic ignition, with no periods of excess emissions. On the emission summary and in the emission calculations, it appears that the flare emissions are represented at EPN: VI. This device is also referred to as a thermal oxidizer or vapor incinerator.
 - Please clarify what the control device is that is represented under EPN: VI.
 - Please clarify what “no periods of excess emissions” means.
- There are eight 10,000 lb capacity metal tanks at the site that are used to produce polymer concrete mix. However, the application does not address how these tanks will be authorized. Are the tanks authorized under PBR 106.472? Will there be emissions from the tanks and/or are they controlled?
 - Please confirm how the tanks are being authorized and if there are emissions associated the storage and mixing of the dry materials.
- The 261/262 workbook includes chemicals that are listed as “Unknown”, “Internt / Unknown”, and “Other”. These emissions will need to be speciated under the most appropriate designated pollutant and will need to be classified.
 - Please provide an updated 106.261/262 workbook that includes these emissions speciated appropriately with an actual chemical name.
 - Please provide clarification on what these chemicals are and provide justification for how they are being listed, if necessary.
- Additionally, the speciated VOC emissions from the workbook are 0.48 lb/hr and 0.51 tpy. However, the emission summary equals 0.16 lb/hr and 0.18 tpy VOC. Is the workbook conservatively estimating VOC emissions?
 - Please explain the discrepancy between the workbook and emission summary table VOC emissions.

Failure to submit all of the requested information by **July 10, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

If you have any questions, feel free to contact me if you would like to discuss over the phone. Please note that the agency will be closed July 4th – 5th in observance of the holiday. Additionally, I will be out of office with no access to my phone or email July 2nd – 8th. I will return on July 9th and would be happy to set up a meeting with you if necessary. I apologize for any inconvenience, but I appreciate your patience.

Thank you,

Camryn Appert

Environmental Permit Specialist

Rule and Registrations Section | Air Permits Division | TCEQ Office of Air

Phone: (512) 239-0625

Email: camryn.appert@tceq.texas.gov

Mail: MC-161, P.O. Box 13087, Austin TX 78711-3087



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Camryn Appert

Sent: Friday, June 28, 2024 7:56 AM

To: 'Amanda Marcks, P.E.' <amarcks@esepartners.com>

Cc: Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Jason Binford <jason@esepartners.com>; Kevin Whitenight <kwhitenight@esepartners.com>

Subject: RE: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

Hi Amanda,

Thank you for your response and call yesterday. I am continuing my review and will let you know if I have any questions.

Have a great weekend!

Kind regards,

Camryn Appert

Environmental Permit Specialist

Rule and Registrations Section | Air Permits Division | TCEQ Office of Air

Phone: (512) 239-0625

Email: camryn.appert@tceq.texas.gov

Mail: MC-161, P.O. Box 13087, Austin TX 78711-3087



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Amanda Marcks, P.E. <amarcks@esepartners.com>

Sent: Thursday, June 27, 2024 3:30 PM

To: Camryn Appert <Camryn.Appert@tceq.texas.gov>

Cc: Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Jason Binford <jason@esepartners.com>; Kevin Whitenight <kwhitenight@esepartners.com>

Subject: RE: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

Camryn,

See attached tracking information.

Amanda Marcks, P.E.
Compliance Business Unit Leader

ESE Partners, LLC

400 E. Royal Lane, Building 3, Suite 203
Irving, Texas 75039
O: 469.983.8600
M: 940.440.2435
E: amarcks@esepartners.com
www.esepartners.com

From: Amanda Marcks, P.E.
Sent: Thursday, June 27, 2024 12:35 PM
To: Camryn Appert <Camryn.Appert@tceq.texas.gov>
Cc: Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Jason Binford <jason@esepartners.com>; Kevin Whitenight <kwhitenight@esepartners.com>
Subject: RE: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

Camryn,

See below response:

- The application doesn't address how planned maintenance, startup and shutdown (MSS) activities will be authorized. Will MSS be authorized separately as necessary or is MSS claimed?
 - Please confirm how MSS will be authorized. **MSS activities will not result in additional emissions. The site flare has an automatic ignition and therefore no periods of excess emissions are expected. Additionally, cleaning activity emissions are included in the FUG EPN.**
- The PBR 106.4 checklist indicates that NSPS is applicable for this site, however, it does not include which subpart. Additionally, the application does not explain what is applicable to the NSPS requirements or how they will comply. **NSPS does not apply. While they use a resin in their process, they are not producing or manufacturing resins.**
 - Please provide the NSPS subpart, what equipment is applicable, and a demonstration of compliance for the federal requirements. **N/A**
- The Form PI-7 CERT has the distance to the nearest off-plant receptor listed as >600 feet. However, the distance used in the calculations is 300 feet to the nearest off-plant receptor. Was 300 feet used in the calculations as a conservative measure?
 - Please confirm the distance to the nearest off-plant receptor. **I confirmed nearest receptor to be >300 ft and have revised the PI-Cert. This will go in the mail today and I will provide you tracking information once I have it. Attached is the unsigned revised version.**

Amanda Marcks, P.E.
Compliance Business Unit Leader

ESE Partners, LLC

400 E. Royal Lane, Building 3, Suite 203

Irving, Texas 75039

O: 469.983.8600

M: 940.440.2435

E: amarcks@esepartners.com

www.esepartners.com

From: Camryn Appert <Camryn.Appert@tceq.texas.gov>

Sent: Thursday, June 20, 2024 2:43 PM

To: Amanda Marcks, P.E. <amarcks@esepartners.com>

Cc: Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald
<Trishia.McDonald@tceq.texas.gov>

Subject: [EXTERNAL] RE: TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Amanda,

Thank you for letting me know. The contact information for this application will need to be updated. Along with the other deficiency items, please provide an updated Form PI-7 Cert.

- The PI-7 Cert must have a wet signature and must be faxed or mailed to the Air Permits Initial Review Team (APIRT) at the address below:
 - Fax: 512-239-1400
 - Mail:
 - Air Permits Division Attn. Camryn Appert, MC 161
 - TCEQ
 - P.O. Box 13087
 - Austin, TX 78711-3087
 - If the form is mailed, please provide the tracking information and an electronic copy of the form so we can proceed with the review as soon as the agency receives the form.

Failure to submit all of the requested information by **June 27, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

Please let me know if you have any questions.

Kind regards,

Camryn Appert

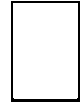
Environmental Permit Specialist

Rule and Registrations Section | Air Permits Division | TCEQ Office of Air

Phone: (512) 239-0625

Email: camryn.appert@tceq.texas.gov

Mail: MC-161, P.O. Box 13087, Austin TX 78711-3087



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customersurvey

From: Amanda Marcks, P.E. <amarcks@esepartners.com>

Sent: Thursday, June 20, 2024 2:13 PM

To: Camryn Appert <Camryn.Appert@tceq.texas.gov>

Cc: Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Crystal Delacruz
<Crystal.DelaCruz@tceq.texas.gov>

Subject: RE: [EXTERNAL] TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures
LLC's J&h American Enclosures site

Good afternoon,

Zeema is no longer with ESE, so I will be the technical contact on this submittal going
forward. I will need to review application package and get back to you.

Thanks,

Amanda Marcks, P.E.

Compliance Business Unit Leader

ESE Partners, LLC

400 E. Royal Lane, Building 3, Suite 203

Irving, Texas 75039

O: 469.983.8600

M: 940.440.2435

E: amarcks@esepartners.com

www.esepartners.com

From: Jason Binford <jason@esepartners.com>

Sent: Thursday, June 20, 2024 8:20 AM

To: Amanda Marcks, P.E. <amarcks@esepartners.com>

Subject: FW: [EXTERNAL] TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures
LLC's J&h American Enclosures site

From: Camryn Appert <Camryn.Appert@tceq.texas.gov>

Sent: Thursday, June 20, 2024 8:04 AM

To: Zeema Haque <zhaque@esepartners.com>

Cc: Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>

Subject: [EXTERNAL] TCEQ Air Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC's J&h American Enclosures site

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Ms. Haque,

I am the TCEQ Air Permit Reviewer assigned to the PBR Permit No. 176687 / Project No. 375479 at J&H American Enclosures LLC and J&h American Enclosures in Johnson County, Texas. You have been identified as a Technical Contact.

I have completed my initial review for this project and will need additional information/clarification before I can proceed with my review. Please address the following:

- The application doesn't address how planned maintenance, startup and shutdown (MSS) activities will be authorized. Will MSS be authorized separately as necessary or is MSS claimed?
 - Please confirm how MSS will be authorized.
- The PBR 106.4 checklist indicates that NSPS is applicable for this site, however, it does not include which subpart. Additionally, the application does not explain what is applicable to the NSPS requirements or how they will comply.
 - Please provide the NSPS subpart, what equipment is applicable, and a demonstration of compliance for the federal requirements.
- The Form PI-7 CERT has the distance to the nearest off-plant receptor listed as >600 feet. However, the distance used in the calculations is 300 feet to the nearest off-plant receptor. Was 300 feet used in the calculations as a conservative measure?
 - Please confirm the distance to the nearest off-plant receptor.

Failure to submit all of the requested information by **June 27, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

If you have questions or would like to discuss this project over the phone, feel free to contact me.

Thank you,

Ms. Camryn Appert

Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-0625
Camryn.Appert@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at
www.tceq.texas.gov/customersurvey

ESTIMATED EMISSIONS																		
EPN(s) / Emission Source(s)	VOC		NOx		CO		PM		PM ₁₀		PM _{2.5}		SO ₂		H ₂ S		HAPs	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
DC-1 / Dust Collector Dry Material Loading	-	-	-	-	-	-	0.1403	0.1459	0.0683	0.0710	0.0209	0.0217	-	-	-	-	-	-
Fug / Fugitive (Cleaning & Curing)	0.1542	0.1603	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.1207	0.1255
RTO / Thermal Oxidizer	0.0152	0.0202	0.0222	0.0974	0.1013	0.4438	0.0012	0.0051	0.0009	0.0038	0.0003	0.0013	0.0000	0.0002	-	-	0.0147	0.0183
SITE-WIDE TOTAL:	0.1694	0.1805	0.0222	0.0974	0.1013	0.4438	0.1414	0.1510	0.0691	0.0748	0.0211	0.0230	0.0000	0.0002	-	-	0.1355	0.1444

Certification and Registration for Permits by Rule
Form PI-7-CERT
Page 1
Texas Commission on Environmental Quality

I. Registrant Information
A. Company or Other Legal Customer Name
Company Official Contact Information (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Other: _____)
Name: Homer Perez
Title: General Manager
Mailing Address: 8328 E Hwy 67
City: Alvarado
State: TX
ZIP Code: 76009
Phone:
Fax:
Email Address: jh_american@yahoo.com
<i>All PBR registration responses will be sent via email.</i>
A. Technical Contact Information (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Other: _____)
Name: Amanda Marcks, PE
Title: Compliance Business Unit Leader
Company Name: ESE Partners, LLC
Mailing Address: 400 E. Royal Lane, Building 3, Suite 203
City: Irving
State: TX
ZIP Code: 75039
Phone Number: (940) 440-2435
Fax Number:
Email Address: amarcks@esepartners.com

Certification and Registration for Permits by Rule
Form PI-7-CERT
Page 2
Texas Commission on Environmental Quality

II. Facility and Site Information
A. Name and Type of Facility
Facility Name: J&H American Enclosures
Facility Type: <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Temporary
For portable units, please provide the serial number of the equipment being authorized below.
Serial No(s): N/A
B. Facility Location Information
Street Address: 8328 E Hwy 67
If there is no street address, provide written driving directions to the site and provide the closest city or town, county, and ZIP code for the site (attach description if additional space is needed).
City: Alvarado
County: Johnson
ZIP Code: 76009
C. TCEQ Core Data Form
Is the Core Data Form (TCEQ Form Number 10400) attached? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "NO," provide customer reference number (CN) and regulated entity number (RN) below.
Customer Reference Number (CN): CN606185445
Regulated Entity Number (RN): RN111816096
D. TCEQ Account Identification Number (if known):
E. Type of Action
<input checked="" type="checkbox"/> Initial Application <input type="checkbox"/> Change to Registration
For Change to Registration provide the Registration Number:
F. PBR number(s) claimed under 30 TAC Chapter 106
(List all the individual rule number(s) that are being claimed.)
106. 261
106. 262
106. 472
106.

Certification and Registration for Permits by Rule
Form PI-7-CERT
Page 3
Texas Commission on Environmental Quality

II. Facility and Site Information <i>(continued)</i>
G. Historical Standard Exemption or PBR
Are you claiming a historical standard exemption or PBR? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," enter rule number(s) and associated effective date in the spaces provided below.
Rule Number: Effective Date:
Rule Number: Effective Date:
H. Previous Standard Exemption or PBR Registration Number
Is this authorization for a change to an existing facility previously authorized under a standard exemption or PBR? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," enter previous standard exemption number(s) and PBR registration number(s) and associated effective dates in the spaces provided below.
Standard Exemption or PBR Registration Number:
Effective Date:
I. Other Facilities at this Site Authorized by Standard Exemption, PBR, or Standard Permit
Are there any other facilities at this site that are authorized by an Air Standard Exemption, PBR, or Standard Permit? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," enter standard exemption number(s), PBR registration number(s), and Standard Permit registration number(s), and associated effective date in the spaces provided below.
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s):
Effective Date:
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s):
Effective Date:
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s):
Effective Date:
J. Other Air Preconstruction Permits
Are there any other air preconstruction permits at this site? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," enter permit number(s) in the spaces provided below.
K. Affected Air Preconstruction Permits
Does the PBR being claimed directly affect any permitted facility? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

Certification and Registration for Permits by Rule
Form PI-7-CERT
Page 4
Texas Commission on Environmental Quality

II. Facility and Site Information <i>(continued)</i>
If "YES," enter the permit number(s) in the spaces provided below.
L. Federal Operating Permit (FOP) Requirements (30 TAC Chapter 122 Applicability)
1. Is this facility located at a site that is required to obtain an FOP pursuant to 30 TAC Chapter 122? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> To Be Determined
If the site currently has an existing FOP, enter the permit number:
Check the requirements of 30 TAC Chapter 122 that will be triggered if this certification is accepted. <i>(check all that apply)</i>
<input type="checkbox"/> Initial Application for a FOP <input type="checkbox"/> Significant Revision for an SOP <input type="checkbox"/> Minor Revision for an SOP
<input type="checkbox"/> Operational Flexibility/Off Permit Notification for an SOP <input type="checkbox"/> Revision for a GOP
<input type="checkbox"/> To Be Determined <input checked="" type="checkbox"/> None
2. Identify the type(s) of FOP issued and/or FOP application(s) submitted/pending for the site. <i>(check all that apply)</i>
<input type="checkbox"/> SOP <input type="checkbox"/> GOP <input type="checkbox"/> GOP application/revision (submitted or under APD review)
<input checked="" type="checkbox"/> N/A <input type="checkbox"/> SOP application/revision (submitted or under APD review)
III. Fee Information <i>(See Section VII. for address to send fee or go to www.tceq.texas.gov/epay to pay online.)</i>
A. Fee Requirements
Is a fee required per Title 30 TAC § 106.50? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
If "NO," specify the exception. There are three exceptions to paying a PBR fee. <i>(check all that apply)</i>
1. Registration is solely to establish a federally enforceable emission limit. <input type="checkbox"/>
2. Registration is within six months of an initial PBR review, and it is addressing deficiencies, administrative changes, or other allowed changes. <input type="checkbox"/>
3. Registration is for a remediation project (30 TAC § 106.533). <input type="checkbox"/>
B. Fee Amount
1. A \$100 fee is required if <i>any</i> of the answers in III.B.1 are "YES."
This business has less than 100 employees. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
This business has less than \$6 million dollars in annual gross receipts. <input type="checkbox"/> YES <input type="checkbox"/> NO
This registration is submitted by a governmental entity with a population of less than 10,000. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
This registration is submitted by a non-profit organization. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

Certification and Registration for Permits by Rule
Form PI-7-CERT
Page 5
Texas Commission on Environmental Quality

III. Fee Information (See Section VII. for address to send fee or go to www.tceq.texas.gov/epay to pay online.) (continued)
2. A \$450 fee is required for all other registrations
A. Payment Information
Check/money order/transaction or voucher number:
Individual or company name on check:
Fee Amount: \$
Was the fee paid online? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
IV. Technical Information Including State and Federal Regulatory Requirements Check the appropriate box to indicate what is included in your submittal. NOTE: Any technical or essential information needed to confirm that facilities are meeting the requirements of the PBR must be provided. Not providing key information could result in a deficiency of the project.
A. PBR requirements (Checklists are optional; however, your review will go faster if you provide applicable checklists.)
Did you demonstrate that the general requirements in 30 TAC § 106.4 are met? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Did you demonstrate that the individual requirements of the specific PBR are met? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Confidential Information Included (If confidential information is submitted with this registration, all confidential pages must be properly marked "CONFIDENTIAL.") <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
C. Process Flow Diagram: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
D. Process Description: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
E. Maximum Emissions Data and Calculations: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Note: If the facilities listed in this registration are subject to the Mass Emissions Cap & Trade program under 30 TAC Chapter 101, Subchapter H, Division 3 , the owner/operator of these facilities must possess NO _x allowances equivalent to the actual NO _x emissions from these facilities.
F. Is this certification being submitted to certify the emissions for the entire site? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
If "NO," include a summary of the specific facilities and emissions being certified.
G. Table 1(a) (Form 10153) Emission Point Summary: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
H. Distances from Property Line and Nearest Off-Property Structure
Distance from this facility's emission release point to the nearest property line: >200 feet
Distance from this facility's emission release point to the nearest off-property structure: >300 feet

Certification and Registration for Permits by Rule
Form PI-7-CERT
Page 6
Texas Commission on Environmental Quality

IV. Technical Information Including State and Federal Regulatory Requirements

Check the appropriate box to indicate what is included in your submittal.

NOTE: Any technical or essential information needed to confirm that facilities are meeting the requirements of the PBR must be provided. Not providing key information could result in a deficiency of the project.

I. Project Status

Has the company implemented the project or waiting on a response from TCEQ?

☒ Implemented ☐ Waiting

J. Projected Start of Construction and Projected Start of Operation Dates:

Projected Start of Construction (provide date):

Projected Start of Operation (provide date):

V. Delinquent Fees

This form **will not be processed** until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ is paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ website at: www.tceq.texas.gov/agency/financial/fees/delin/index.html.

VI. Signature For Registration and Certification

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which this application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382, the Texas Clean Air Act (TCAA); the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.

Homer Perez B

Name (printed)

Signature (original signature required)

Date

Certification and Registration for Permits by Rule
Form PI-7-CERT
Page 7
Texas Commission on Environmental Quality

VII. Submitting Copies of the Certification and Registration

Copies must be sent as listed below.

Processing delays may occur if copies are not sent as noted.

Who	Where	What
Air Permits Initial Review Team (APIRT)	Regular, Certified, Priority Mail MC 161, P.O. Box 13087 Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor Austin, Texas 78753	Originals Form PI-7-CERT, Core Data Form, and all attachments. Not required if using ePermits ¹ .
Revenue Section, TCEQ	Regular, Certified, Priority Mail MC 214, P.O. Box 13088 Austin, Texas 78711-3088 Hand Delivery, Overnight Mail MC 214, 12100 Park 35 Circle, Building A, Third Floor Austin, Texas 78753	Original Money Order or Check, Copy of Form PI-7-CERT, and Core Data Form. Not required if fee was paid using ePay ² .
Appropriate TCEQ Regional Office	To find your Regional Office address, go to the TCEQ website at www.tceq.texas.gov/agency/directory/region , or call (512) 239-1250.	Copy of Form PI-7-CERT, Core Data Form, and all attachments. Not required if using ePermits
Appropriate Local Air Pollution Control Program(s)	To Find your local or Regional Air Pollution Control Programs go to the TCEQ, APD website at www.tceq.texas.gov/permitting/air/local_programs.html , or call (512)-239-1250	Copy of Form PI-7-CERT, Core Data Form, and all attachments.

¹ ePermits located at www3.tceq.texas.gov/steers/

² ePay located at www.tceq.texas.gov/epay

TCEQ-20182 (APD-ID177v1.0, revised 12/22) PI-7-CERT

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.