



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • [www.idem.IN.gov](http://www.idem.IN.gov)

Mike Braun  
Governor

August 29, 2025

Clint Woods  
Commissioner

VIA ELECTRONIC MAIL:

Kurt Russell, President  
Precoat Metals Corp.  
635 Maryville Center Drive, Suite 300  
Saint Louis, MO 63141  
[Kurt\\_russel@precoat.com](mailto:Kurt_russel@precoat.com)

VIA CERTIFIED MAIL #7002 0510 0002 5822 6053

CT Corporation System, Registered Agent  
334 North Senate Avenue  
Indianapolis, IN 46204

Re: Notice of Violation and Proposed Agreed Order  
Precoat Metals, a division of  
Sequa Corporation  
Plant ID No. 127-00005  
Portage, Porter County  
Case No. 2022-29073-A

**Qualified offer of settlement: inadmissible pursuant to Rule 408 of the Ind. Rules of Evidence. IDEM asserts that any offer to compromise a claim or any acceptance of such offer does not bind or obligate the parties of this enforcement action in the absence of a final order of the agency.**

Dear Mr. Russell:

This is to advise that the Indiana Department of Environmental Management ("IDEM") has conducted an investigation of Precoat Metals, a division of Sequa Corporation located at 6144 US Highway 12 in Portage, Indiana. As a result of information obtained during that investigation, IDEM has made a preliminary determination that violations of environmental permit conditions exist. Pursuant to IC 13-30-3-3, enclosed please find a Notice of Violation that sets forth the alleged violations, and a proposed Agreed Order which constitutes a qualified offer of settlement.

You may request a settlement conference to discuss the allegations and the actions necessary to correct and resolve the violations, which may include injunctive relief and the establishment of a compliance schedule. Payment of a civil penalty will also be discussed. The civil penalty amount noted in the proposed Agreed Order contains a preliminary penalty figure for settlement discussion purposes only and is based on penalty calculations associated with the alleged violations set forth in the Notice of Violation. A portion of the civil penalty may be offset by performing an approved Supplemental Environmental Project (SEP). Typical SEPs have included pollution prevention, pollution control, and environmental restoration projects. A copy of IDEM's SEP policy may be obtained from this office or at IDEM's website at [www.IN.gov/idem](http://www.IN.gov/idem).

Visit [on.IN.gov/survey](http://on.IN.gov/survey) or scan the QR code to provide feedback.

*We appreciate your input!*



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The individual signing the enclosed Agreed Order should be the President of the company or other authorized signatory. The timely entry into an Agreed Order, which saves you and IDEM time and resources, may lead to a reduction in the civil penalty.

IDEM is not required to extend the offer of entry into an Agreed Order for more than sixty days. You may enter into an Agreed Order without admitting that the violations occurred. If an Agreed Order is not entered into, IDEM may proceed to issue a unilateral notice and order requiring compliance with the environmental permit conditions, including payment of a civil penalty. Please contact me at 317-232-8412 or [LHayhurs@idem.in.gov](mailto:LHayhurs@idem.in.gov) if you have any questions or if you wish to request a settlement conference.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Ward", written in a cursive style.

Lisa Ward  
Case Manager  
Enforcement Section  
Office of Air Quality

Enclosures:

cc: Anu Singh, Director of EHS, Precoat Metals, [anu\\_singh@precoat.com](mailto:anu_singh@precoat.com)  
Nathan Frank, US EPA Region 5  
Lisa Ward, Compliance and Enforcement Branch, Office of Air Quality  
Thalia Hobson, Compliance and Enforcement Branch, Office of Air Quality  
Randall Hoffman, Compliance and Enforcement Branch, OAQ  
<http://www.IN.gov/idem>



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-8027 • (317) 232-8803 • Fax (317) 233-8847 • [www.idem.IN.gov](http://www.idem.IN.gov)

Mike Braun  
Governor

Clint Woods  
Commissioner

August 29, 2025

## **NOTICE OF VIOLATION**

Via Electronic Mail:

Via Certified Mail# 7002 0510 0002 5822 6053

To: Precoat Metals Corp.  
Attn: Kurt Russell, President  
635 Maryville Center Drive, Suite  
300  
Saint Louis, MO 63141  
[Kurt\\_russel@precoat.com](mailto:Kurt_russel@precoat.com)

To: CT Corporation System,  
Registered Agent  
334 North Senate Avenue  
Indianapolis, IN 46204

Case No. 2022-29073-A

Pursuant to Indiana Code ("IC") 13-30-3-3, the Indiana Department of Environmental Management ("IDEM") issues this Notice of Violation. Based on an investigation including the review of compliance reports conducted by an IDEM representative, IDEM has reason to believe Precoat Metals, a division of Sequa Corporation ("Respondent") violated environmental permit conditions. The violations are based on the following:

1. Respondent is Precoat Metals, a division of Sequa Corporation, which owns and operates the stationary metal coil coating operation with Plant ID No. 127-00005, located at 6144 US Highway 12 in Portage, Porter County, Indiana ("Site").
2. Pursuant to Federally Enforceable State Operating Permit 127-43040-00005 ("Permit") Conditions D.1.1 and D.1.2, Respondent shall limit the total Volatile Organic Compound ("VOC") input such that the combined VOC emissions after control shall not exceed forty-six (46) tons per twelve (12) consecutive month period.

Respondent failed to limit the input to less than forty-six (46) tons of VOC per twelve (12) consecutive month period during the Third and Fourth Quarters of 2022 and the First and Second Quarters, in violation of Permit Conditions D.1.1 and D.1.2.

Pursuant to IC 13-30-3-3, the Commissioner herein provides notice that the violations may exist and offers an opportunity to enter into an Agreed Order providing for the actions required to correct the violations and, as necessary and appropriate, for the payment of a civil penalty. The Commissioner is not required to extend this offer for more than sixty (60) days.

Visit [on.IN.gov/survey](https://on.IN.gov/survey) or scan the QR code to provide feedback.

*We appreciate your input!*

Let's keep it real. 01/23/2024



Pursuant to IC 13-30-3-3, an alleged violator may enter into an Agreed Order without admitting the violations occurred. IDEM encourages settlement by Agreed Order, thereby resulting in quicker correction of the environmental violations and avoidance of extensive litigation. Timely settlement by Agreed Order may result in a reduced civil penalty. Also, settlement discussions will allow Respondent the opportunity to present any mitigating factors that may be relevant to the violations.

If an Agreed Order is not entered into within sixty (60) days of receipt of this Notice of Violation, the Commissioner may issue a Notice and Order under IC 13-30-3-4 containing the actions that must be taken to correct the violations and requiring the payment of an appropriate civil penalty. Pursuant to IC 13-30-4-1, the Commissioner may assess penalties of up to \$25,000 per day for each violation.

Please contact Lisa Ward at 317-232-8412 or LHayhurs@idem.in.gov within fifteen (15) days after receipt of this Notice to discuss resolution of this matter.

For the Commissioner:



Date: 8-29-25

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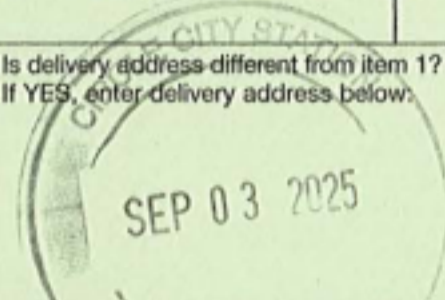
Janusz Johnson, Chief  
Compliance and Enforcement Branch  
Office of Air Quality

cc: Anu Singh, Precoat Metals, anu\_singh@precoat.com  
Nathan Frank, US EPA Region 5  
Porter County Health Department  
Lisa Ward, Compliance and Enforcement Branch, Office of Air Quality  
Thalia Hobson, Compliance and Enforcement Branch, Office of Air Quality  
Randall Hoffman, Compliance and Enforcement Branch, Office of Air Quality  
IDEM Public File

**From:** [Microsoft Outlook](#)  
**To:** [Kurt\\_Russell@precoat.com](mailto:Kurt_Russell@precoat.com); [Anu Singh](#)  
**Subject:** Relayed: Precoat Metals, a division of Sequa Corporation (#29073-A) Notice of Violation & Proposed Agreed Order  
**Date:** Friday, August 29, 2025 9:44:58 AM  
**Attachments:** [Precoat Metals a division of Sequa Corporation \(#29073-A\) Notice of Violation Proposed Agreed Order.msg](#)

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Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:  
Kurt\_Russell@precoat.com (kurt\_russell@precoat.com) <mailto:kurt\_russell@precoat.com>  
Anu Singh (anu\_singh@precoat.com) <mailto:anu\_singh@precoat.com>  
Subject: Precoat Metals, a division of Sequa Corporation (#29073-A) Notice of Violation & Proposed Agreed Order

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY												
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature    <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p><input checked="" type="checkbox"/> Received by (Printed Name) C. Date of Delivery</p>												
<p>1. Article Addressed to:</p> <p><b>60-02-A/gjr NOV/PAO 2022-29073-A</b>  <b>CT CORPORATION SYSTEM</b>  <b>REGISTERED AGENT</b>  <b>334 N SENATE AVE</b>  <b>INDIANAPOLIS IN 46204</b></p>  <p>9590 9402 8243 3030 3278 54</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p> 												
<p>2. Article Number (Transfer from service label)</p> <p><b>7002 0510 0002 5822 6053</b></p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Restricted Delivery</td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Restricted Delivery
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