

**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#)  
**Subject:** Follow-up and question  
**Date:** Tuesday, October 3, 2023 1:50:27 PM

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

Thanks again for meeting with me last Friday. I wanted to follow up on a question we discussed about Kennametal's torch that we will be looking to add to their permit as a natural gas combustion unit. As you may recall, it is currently in use as a propane combustion unit not listed on the current permit/registration but will be converted later this year pending the permit/registration amendment. I'm looking for confirmation that we could proceed with the amendment process identifying it as a natural gas unit (anticipated) rather than submitting an amendment to have it added as a current propane unit now, only to then file another amendment to change it to a natural gas fired unit in two months. I think you were discussing internally and I was just looking to see if there has been a determination on this. As a reminder, the emissions calculations are showing this proposed NG configuration as 0.18 tpy NOX for this unit.

Also, we had discussed their plan to reroute a dust collection system from an indoor localized receptacle (drum/bin) to inclusion into their existing baghouse (DC5) which is already part of the permit/registration servicing the Iron/Nickel classifying operation. I believe you mentioned that this may not necessarily require an amendment, but in the event that it does, we may be needing Form CE-02 (Baghouse/Fabric Filter). Question: do we need the amendment for this and if so, would we actually need the Form CE-02 since the baghouse (DC5) is already covered under the current permit/registration?

Just looking for clarification as I move through preparing the amendment.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

[Click here to connect with me on LinkedIn](#)

**AECOM**

707 Grant Street  
5th Floor  
Pittsburgh, PA 15219, United States  
T +412-395-8888

[aecom.com](http://aecom.com)

**Delivering a better world**

[LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#)  
**Subject:** RE: Follow-up and question  
**Date:** Tuesday, October 3, 2023 2:44:00 PM  
**Attachments:** [image001.png](#)

---

Hello,

Thank you for following up:

1. Yes, you may proceed with the amendment process identifying it as a natural gas unit.
2. You would not need the form CE-02 since the baghouse is already in the permit. I would say include the transitioning of control devices in the amendment.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <Matt.Graves1@aecom.com>  
**Sent:** Tuesday, October 3, 2023 1:50 PM  
**To:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Subject:** Follow-up and question

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Thanks again for meeting with me last Friday. I wanted to follow up on a question we discussed about Kennametal's torch that we will be looking to add to their permit as a natural gas combustion unit. As you may recall, it is currently in use as a propane combustion unit not listed on the current permit/registration but will be converted later this year pending the permit/registration amendment. I'm looking for confirmation that we could proceed with the amendment process identifying it as a natural gas unit (anticipated) rather than submitting an amendment to have it added as a current propane unit now, only to then file another amendment to change it to a natural gas fired unit in two months. I think you were discussing internally and I was just looking to see if there has been a determination on this. As a reminder, the emissions calculations are showing this proposed NG configuration as 0.18 tpy NOX for this unit.

Also, we had discussed their plan to reroute a dust collection system from an indoor localized receptacle (drum/bin) to inclusion into their existing baghouse (DC5) which is already part of the permit/registration servicing the Iron/Nickel classifying operation. I believe you mentioned that this may not necessarily require an amendment, but in the event that it does, we may be needing Form CE-02 (Baghouse/Fabric Filter). Question: do we need the amendment for this and if so, would we actually need the Form CE-02 since the baghouse (DC5) is already covered under the current permit/registration?

Just looking for clarification as I move through preparing the amendment.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

[Click here to connect with me on LinkedIn](#)

**AECOM**

707 Grant Street  
5th Floor  
Pittsburgh, PA 15219, United States  
T +412-395-8888

[aecom.com](http://aecom.com)

**Delivering a better world**

[LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#)  
**Cc:** [Chevalier, Laura](#)  
**Subject:** RE: Follow-up and question  
**Date:** Tuesday, October 3, 2023 2:46:59 PM  
**Attachments:** [image001.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Great!! Thanks for the prompt reply.

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Sent:** Tuesday, October 3, 2023 2:45 PM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>  
**Subject:** RE: Follow-up and question

Hello,

Thank you for following up:

1. Yes, you may proceed with the amendment process identifying it as a natural gas unit.
2. You would not need the form CE-02 since the baghouse is already in the permit. I would say include the transitioning of control devices in the amendment.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---



**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, October 3, 2023 1:50 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Subject:** Follow-up and question

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Thanks again for meeting with me last Friday. I wanted to follow up on a question we discussed about Kennametal's torch that we will be looking to add to their permit as a natural gas combustion unit. As you may recall, it is currently in use as a propane combustion unit not listed on the current permit/registration but will be converted later this year pending the permit/registration amendment. I'm looking for confirmation that we could proceed with the amendment process identifying it as a natural gas unit (anticipated) rather than submitting an amendment to have it added as a current propane unit now, only to then file another amendment to change it to a natural gas fired unit in two months. I think you were discussing internally and I was just looking to see if there has been a determination on this. As a reminder, the emissions calculations are showing this proposed NG configuration as 0.18 tpy NOX for this unit.

Also, we had discussed their plan to reroute a dust collection system from an indoor localized receptacle (drum/bin) to inclusion into their existing baghouse (DC5) which is already part of the permit/registration servicing the Iron/Nickel classifying operation. I believe you mentioned that this may not necessarily require an amendment, but in the event that it does, we may be needing Form CE-02 (Baghouse/Fabric Filter). Question: do we need the amendment for this and if so, would we actually need the Form CE-02 since the baghouse (DC5) is already covered under the current permit/registration?

Just looking for clarification as I move through preparing the amendment.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

[Click here to connect with me on LinkedIn](#)

**AECOM**

707 Grant Street  
5th Floor  
Pittsburgh, PA 15219, United States  
T +412-395-8888

[aecom.com](http://aecom.com)

**Delivering a better world**

[LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#)  
**Subject:** RE: Follow-up and question  
**Date:** Thursday, November 2, 2023 11:17:31 AM  
**Attachments:** [image001.png](#)  
[00 Kennametal Stellite-Cover Letter - AA 11-02 \(FINAL\).docx](#)  
[01 Checklist - 51607 10-30 \(FINAL\).doc](#)  
[02 Kennametal Stellite Air Permit Application Cover Sheet 11-02 \(FINAL\).doc](#)  
[03 GSD-01 General Source Data Kennametal Stellite 11-02 \(FINAL\).doc](#)  
[04 46685per \(Amendments - 2023 Redline\) 11-02.docx](#)  
[05 46685calcs REV 11-02 \(FINAL\).xlsx](#)

---

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

As we discussed earlier, I know this is not the official submittal nor the process for it, but if you could give the attached documents a quick look through to make sure I didn't miss anything, I would certainly appreciate it. If you have any comments or suggestions, I'll address those promptly prior to our official submittal.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Sent:** Tuesday, October 3, 2023 2:45 PM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>  
**Subject:** RE: Follow-up and question

Hello,

Thank you for following up:

1. Yes, you may proceed with the amendment process identifying it as a natural gas unit.
2. You would not need the form CE-02 since the baghouse is already in the permit. I would say include the transitioning of control devices in the amendment.

Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager



• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, October 3, 2023 1:50 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Subject:** Follow-up and question

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Thanks again for meeting with me last Friday. I wanted to follow up on a question we discussed about Kennametal's torch that we will be looking to add to their permit as a natural gas combustion unit. As you may recall, it is currently in use as a propane combustion unit not listed on the current permit/registration but will be converted later this year pending the permit/registration amendment. I'm looking for confirmation that we could proceed with the amendment process identifying it as a natural gas unit (anticipated) rather than submitting an amendment to have it added as a current propane unit now, only to then file another amendment to change it to a natural gas fired unit in two months. I think you were discussing internally and I was just looking to see if there has been a determination on this. As a reminder, the emissions calculations are showing this proposed NG configuration as 0.18 tpy NOX for this unit.

Also, we had discussed their plan to reroute a dust collection system from an indoor localized receptacle (drum/bin) to inclusion into their existing baghouse (DC5) which is already part of the permit/registration servicing the Iron/Nickel classifying operation. I believe you mentioned that this may not necessarily require an amendment, but in the event that it does, we may be needing Form CE-02 (Baghouse/Fabric Filter). Question: do we need the amendment for this and if so, would we actually need the Form CE-02 since the baghouse (DC5) is already covered under the current permit/registration?

Just looking for clarification as I move through preparing the amendment.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

[Click here to connect with me on LinkedIn](#)

**AECOM**

707 Grant Street

5th Floor

Pittsburgh, PA 15219, United States

T +412-395-8888

[aecom.com](http://aecom.com)

**Delivering a better world**

[LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#)  
**Subject:** RE: Follow-up and question  
**Date:** Thursday, November 2, 2023 2:15:00 PM  
**Attachments:** [image001.png](#)

---

After a quick glance it looks like you have all the forms to apply. The permit reviewer will look at it more closely once it has gone through intake and is assigned.



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <Matt.Graves1@aecom.com>  
**Sent:** Thursday, November 2, 2023 11:15 AM  
**To:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Subject:** RE: Follow-up and question

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

As we discussed earlier, I know this is not the official submittal nor the process for it, but if you could give the attached documents a quick look through to make sure I didn't miss anything, I would certainly appreciate it. If you have any comments or suggestions, I'll address those promptly prior to our official submittal.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Tuesday, October 3, 2023 2:45 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** RE: Follow-up and question

Hello,

Thank you for following up:

1. Yes, you may proceed with the amendment process identifying it as a natural gas unit.
2. You would not need the form CE-02 since the baghouse is already in the permit. I would say include the transitioning of control devices in the amendment.



Indiana Department of  
Environmental Management

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Sent:** Tuesday, October 3, 2023 1:50 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Subject:** Follow-up and question

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

Sarah,

Thanks again for meeting with me last Friday. I wanted to follow up on a question we discussed about Kennametal's torch that we will be looking to add to their permit as a natural gas combustion unit. As you may recall, it is currently in use as a propane combustion unit not listed on the current permit/registration but will be converted later this year pending the permit/registration amendment. I'm looking for confirmation that we could proceed with the amendment process identifying it as a natural gas unit (anticipated) rather than submitting an amendment to have it added as a current propane unit now, only to then file another amendment to change it to a natural gas fired unit in two months. I think you were discussing internally and I was just looking to see if there has been a determination on this. As a reminder, the emissions calculations are showing this proposed NG configuration as 0.18 tpy NOX for this unit.

Also, we had discussed their plan to reroute a dust collection system from an indoor localized receptacle (drum/bin) to inclusion into their existing baghouse (DC5) which is already part of the

permit/registration servicing the Iron/Nickel classifying operation. I believe you mentioned that this may not necessarily require an amendment, but in the event that it does, we may be needing Form CE-02 (Baghouse/Fabric Filter). Question: do we need the amendment for this and if so, would we actually need the Form CE-02 since the baghouse (DC5) is already covered under the current permit/registration?

Just looking for clarification as I move through preparing the amendment.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.

M (412) 302-3591

[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

[Click here to connect with me on LinkedIn](#)

**AECOM**

707 Grant Street

5th Floor

Pittsburgh, PA 15219, United States

T +412-395-8888

[aecom.com](http://aecom.com)

**Delivering a better world**

[LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#)  
**Cc:** [Chevalier, Laura](#)  
**Subject:** RE: Follow-up and question  
**Date:** Thursday, November 2, 2023 2:17:25 PM  
**Attachments:** [image001.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Great!! Thanks for the quick check up. We will be submitting early next week after we get the internal Kennametal signatures.

Thanks for your guidance in this process.

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Thursday, November 2, 2023 2:15 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** RE: Follow-up and question

After a quick glance it looks like you have all the forms to apply. The permit reviewer will look at it more closely once it has gone through intake and is assigned.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Thursday, November 2, 2023 11:15 AM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Subject:** RE: Follow-up and question



\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

As we discussed earlier, I know this is not the official submittal nor the process for it, but if you could give the attached documents a quick look through to make sure I didn't miss anything, I would certainly appreciate it. If you have any comments or suggestions, I'll address those promptly prior to our official submittal.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Tuesday, October 3, 2023 2:45 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** RE: Follow-up and question

Hello,

Thank you for following up:

1. Yes, you may proceed with the amendment process identifying it as a natural gas unit.
2. You would not need the form CE-02 since the baghouse is already in the permit. I would say include the transitioning of control devices in the amendment.



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, October 3, 2023 1:50 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Subject:** Follow-up and question

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Thanks again for meeting with me last Friday. I wanted to follow up on a question we discussed about Kennametal's torch that we will be looking to add to their permit as a natural gas combustion unit. As you may recall, it is currently in use as a propane combustion unit not listed on the current permit/registration but will be converted later this year pending the permit/registration amendment. I'm looking for confirmation that we could proceed with the amendment process identifying it as a natural gas unit (anticipated) rather than submitting an amendment to have it added as a current propane unit now, only to then file another amendment to change it to a natural gas fired unit in two months. I think you were discussing internally and I was just looking to see if there has been a determination on this. As a reminder, the emissions calculations are showing this proposed NG configuration as 0.18 tpy NOX for this unit.

Also, we had discussed their plan to reroute a dust collection system from an indoor localized receptacle (drum/bin) to inclusion into their existing baghouse (DC5) which is already part of the permit/registration servicing the Iron/Nickel classifying operation. I believe you mentioned that this may not necessarily require an amendment, but in the event that it does, we may be needing Form CE-02 (Baghouse/Fabric Filter). Question: do we need the amendment for this and if so, would we actually need the Form CE-02 since the baghouse (DC5) is already covered under the current permit/registration?

Just looking for clarification as I move through preparing the amendment.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

[Click here to connect with me on LinkedIn](#)

**AECOM**

707 Grant Street  
5th Floor  
Pittsburgh, PA 15219, United States  
T +412-395-8888

[aecom.com](http://aecom.com)

**Delivering a better world**

[LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Randy Porter](#); [Graves, Matt](#)  
**Subject:** IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP  
**Date:** Monday, February 26, 2024 2:59:00 PM  
**Attachments:** [image001.png](#)

---

Dear Randy Porter and Matthew Graves,

I am the permit writer assigned to the current application No. 039-47548-00078 for Kennametal Stellite LP. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

Am I correct in assuming the calculations spreadsheet and permit markup which Mr. Graves sent to my email on 2/20/2024 are the most up-to-date versions? If not, send be the most recent excel and word documents. Have the new units been constructed already? When were they, or when will they be, constructed?

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Kennametal Stellite LP would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Heath Hartley) may be contacted at 317-232-8217 or [HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov).

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Sarah Germann  
Environmental Manager, Office of Air Quality  
Indiana Department of Environmental Management  
Direct Phone: 317-234-6555  
Fax: 317-232-6749  
Email: [SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---



**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#); [Randy Porter](#)  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP  
**Date:** Thursday, February 29, 2024 2:55:48 PM  
**Attachments:** [image001.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

Thank you for the follow up email. Please see below for the details you requested.

1. The word docs and calculations spreadsheet submitted via email (excel file) are the most current.
2. The units requested to be added to the permit have already been constructed and are currently in use. The units were recently identified by KMT as having been omitted from the previous permit(s) after a review of the modification to the Registration/Permit completed by IDEM in August of 2023.
  - a. The approximate installation dates are as follows:
    - i. Air Melt Atomization Tower burners (circa 1985)
    - ii. Rod/Wire casting process heating torch (Installed 2011)
    - iii. Process dust collector (DC12) originally installed 2011 and will be repurposed at the finishing line upon permit/registration modification.
    - iv. Sintering station furnace (Installed 2011)
3. As previously mentioned, the combustion sources are currently operating on propane and will be switched to natural gas upon completion of the permit/registration modification.

If you have any other questions, please let me know.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Sent:** Monday, February 26, 2024 3:00 PM  
**To:** Randy Porter <randy.porter@kennametal.com>; Graves, Matt <Matt.Graves1@aecom.com>  
**Subject:** IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

Dear Randy Porter and Matthew Graves,

I am the permit writer assigned to the current application No. 039-47548-00078 for Kennametal Stellite

LP. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

Am I correct in assuming the calculations spreadsheet and permit markup which Mr. Graves sent to my email on 2/20/2024 are the most up-to-date versions? If not, send me the most recent excel and word documents. Have the new units been constructed already? When were they, or when will they be, constructed?

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Kennametal Stellite LP would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Heath Hartley) may be contacted at 317-232-8217 or [HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov).

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Sarah Germann  
Environmental Manager, Office of Air Quality  
Indiana Department of Environmental Management  
Direct Phone: 317-234-6555  
Fax: 317-232-6749  
Email: [SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP  
**Date:** Thursday, March 14, 2024 3:21:00 PM  
**Attachments:** [image001.png](#)

---

Hello,

I am looking at your calcs some more. What are you doing with your new units?

(6) Air Melt Atomization Tower burners (Thermal Jet): What type of metal are you heating with the burners?

Rod/Wire casting process heating torch (Torch PTE): Are you doing some sort of welding with the heating torches? What are you heating (type of metal)?

Sintering station furnace: What type of metals are you heating and molding together?

Thanks,



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <Matt.Graves1@aecom.com>  
**Sent:** Thursday, February 29, 2024 2:56 PM  
**To:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>; Randy Porter <randy.porter@kennametal.com>  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Thank you for the follow up email. Please see below for the details you requested.

1. The word docs and calculations spreadsheet submitted via email (excel file) are the most current.
2. The units requested to be added to the permit have already been constructed and are currently in use. The units were recently identified by KMT as having been omitted from the previous permit(s) after a review of the modification to the Registration/Permit completed by IDEM in August of 2023.

- a. The approximate installation dates are as follows:
  - i. Air Melt Atomization Tower burners (circa 1985)
  - ii. Rod/Wire casting process heating torch (Installed 2011)
  - iii. Process dust collector (DC12) originally installed 2011 and will be repurposed at the finishing line upon permit/registration modification.
  - iv. Sintering station furnace (Installed 2011)
3. As previously mentioned, the combustion sources are currently operating on propane and will be switched to natural gas upon completion of the permit/registration modification.

If you have any other questions, please let me know.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, February 26, 2024 3:00 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

Dear Randy Porter and Matthew Graves,

I am the permit writer assigned to the current application No. 039-47548-00078 for Kennametal Stellite LP. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

Am I correct in assuming the calculations spreadsheet and permit markup which Mr. Graves sent to my email on 2/20/2024 are the most up-to-date versions? If not, send me the most recent excel and word documents. Have the new units been constructed already? When were they, or when will they be, constructed?

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Kennametal Stellite LP would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Heath Hartley) may be contacted at 317-



232-8217 or [HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov).

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Sarah Germann  
Environmental Manager, Office of Air Quality  
Indiana Department of Environmental Management  
Direct Phone: 317-234-6555  
Fax: 317-232-6749  
Email: [SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Cc:** [Chevalier, Laura](#)  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP  
**Date:** Monday, March 25, 2024 4:22:00 PM  
**Attachments:** [image001.png](#)

---

Hello Matt,

I am working on the draft for Kennametal and have a follow up question about the Linishing line and the new baghouse. It is my understanding that the Linishing line (or is it Finishing line?) was already a part of the source. Was the linishing line included in the pervious permitting action? Where is this line in the previous permit and previous calculations? Adding dust collector DC12 has increased the PTE of the source. If the Linishing line was already included in the PTE of the previous permit's calculation, then the PTE should not have increased by adding a dust collector/control device.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Monday, March 18, 2024 12:12 PM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Chevalier, Laura <laura.chevalier@aecom.com>  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

Thank you for the information.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Monday, March 18, 2024 12:09 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Chevalier, Laura <[laura.chevalier@aecom.com](mailto:laura.chevalier@aecom.com)>  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

I've discussed your questions with Randy and his team from Kennametal. The clarification responses to your questions are as follows in **RED**:

1. What are you doing with your new units?
  - a. (6) Air Melt Atomization Tower burners (Thermal Jet): What type of metal are you heating with the burners?
    - i. **No metal is actually heated with the thermal jets (tower burners). The burners are used to heat up the tundish (funnel like structure) to keep molten alloy poured into the tundish from solidifying / freezing on the surface of the tundish which would block the flow if not heated. The molten alloy then goes into the tower where it is converted to a powder material for additional processing.**
  - b. Rod/Wire casting process heating torch (Torch PTE):
    - i. Are you doing some sort of welding with the heating torches?
      1. **No welding is taking place in this process. The heating torch keeps the ladle hot enough to prevent molten metal from solidifying / freezing off to the surface of the ladle.**
    - ii. What are you heating (type of metal)?
      1. **The inner surface of the ladle (refractory) is heated by the torch. The inner refractory lining is the contact point for the molten metal in the process.**
  - c. Sintering station furnace: What type of metals are you heating and molding together?
    - i. **The sintering station serves to heat / cure the refractory of a caster that is used in the production of metal rods from the molten alloy. The torch of the sintering station does not heat metal but rather is used to heat the**

**refractory of the caster to remove any residual moisture prior to the addition of molten metal in the process.**

Please let us know if you have any additional questions or need further clarification.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Thursday, March 14, 2024 3:22 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

Hello,

I am looking at your calcs some more. What are you doing with your new units?

(6) Air Melt Atomization Tower burners (Thermal Jet): What type of metal are you heating with the burners?

Rod/Wire casting process heating torch (Torch PTE): Are you doing some sort of welding with the heating torches? What are you heating (type of metal)?

Sintering station furnace: What type of metals are you heating and molding together?

Thanks,



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Sent:** Thursday, February 29, 2024 2:56 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Thank you for the follow up email. Please see below for the details you requested.

1. The word docs and calculations spreadsheet submitted via email (excel file) are the most current.
2. The units requested to be added to the permit have already been constructed and are currently in use. The units were recently identified by KMT as having been omitted from the previous permit(s) after a review of the modification to the Registration/Permit completed by IDEM in August of 2023.
  - a. The approximate installation dates are as follows:
    - i. Air Melt Atomization Tower burners (circa 1985)
    - ii. Rod/Wire casting process heating torch (Installed 2011)
    - iii. Process dust collector (DC12) originally installed 2011 and will be repurposed at the finishing line upon permit/registration modification.
    - iv. Sintering station furnace (Installed 2011)
3. As previously mentioned, the combustion sources are currently operating on propane and will be switched to natural gas upon completion of the permit/registration modification.

If you have any other questions, please let me know.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, February 26, 2024 3:00 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

Dear Randy Porter and Matthew Graves,

I am the permit writer assigned to the current application No. 039-47548-00078 for Kennametal Stellite LP. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

Am I correct in assuming the calculations spreadsheet and permit markup which Mr. Graves sent to my email on 2/20/2024 are the most up-to-date versions? If not, send me the most recent excel and word documents. Have the new units been constructed already? When were they, or when will they be, constructed?

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Kennametal Stellite LP would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Heath Hartley) may be contacted at 317-232-8217 or [HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov).

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Sarah Germann  
Environmental Manager, Office of Air Quality  
Indiana Department of Environmental Management  
Direct Phone: 317-234-6555  
Fax: 317-232-6749  
Email: [SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#); [Randy Porter](#)  
**Cc:** [Chevalier, Laura](#)  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP  
**Date:** Monday, March 25, 2024 5:27:55 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

The Linisher (yes, Linisher / linishing line) previously collected dust to a local indoors canister/drum and accordingly, was not in the previous permits. The facility is looking to redirect the dust collection from that indoor / local collection canister and reroute it / combine it into Baghouse DC5. The calculations submitted to you with this application account for that increased load to Baghouse DC5.

Suggested permit edits clipped below from the Redline document previously submitted. Item (k).

Kennametal Stellite LP  
Goshen, Indiana  
Permit Reviewer: ERG/RB

Administrative Amendment No. 039-46685-00078  
Amended by: Sarah Germann

Page 3 of 14  
Registration No. 039-14366-00078

- (fh) One (1) welding powder coating spray booth, identified as Booth A, constructed in 2002, using a maximum usage of 20 pounds per hour and a maximum throughput rate of 24 pounds of parts per hour, controlled by Baghouse DC8. This booth is located in the Research and Development Laboratory and is used only for experimental study and testing for welding torches.
- (gi) One (1) general ventilation baghouse, identified as DC-10, permitted in 2015, for ambient room dust collection and increased airflow, and exhausting within the building.
- (hj) Two (2) general ventilation dust collectors, identified as DC-11 and DC2, permitted in 2018, for ambient room dust collection and increased airflow, and exhausting within the building.
- (k) One (1) process dedicated dust collector identified as DC12 for dust collection at the linishing equipment line discharging to Baghouse DC5.

Let me know if you have any other questions.

Thanks again,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Sent:** Monday, March 25, 2024 4:23 PM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Chevalier, Laura <laura.chevalier@aecom.com>  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

Hello Matt,

I am working on the draft for Kennametal and have a follow up question about the Linishing line and the new baghouse. It is my understanding that the Linishing line (or is it Finishing line?) was already a part of the source. Was the linishing line included in the pervious permitting action? Where is this line in the previous permit and previous calculations? Adding dust collector DC12 has increased the PTE of the source. If the Linishing line was already included in the PTE of the previous permit's calculation, then the PTE should not have increased by adding a dust collector/control device.



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Monday, March 18, 2024 12:12 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Chevalier, Laura <[laura.chevalier@aecom.com](mailto:laura.chevalier@aecom.com)>  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

Thank you for the information.



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Monday, March 18, 2024 12:09 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Chevalier, Laura <[laura.chevalier@aecom.com](mailto:laura.chevalier@aecom.com)>  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

Sarah,

I've discussed your questions with Randy and his team from Kennametal. The clarification responses to your questions are as follows in **RED**:

1. What are you doing with your new units?
  - a. (6) Air Melt Atomization Tower burners (Thermal Jet): What type of metal are you heating with the burners?
    - i. **No metal is actually heated with the thermal jets (tower burners). The burners are used to heat up the tundish (funnel like structure) to keep molten alloy poured into the tundish from solidifying / freezing on the surface of the tundish which would block the flow if not heated. The molten alloy then goes into the tower where it is converted to a powder material for additional processing.**
  - b. Rod/Wire casting process heating torch (Torch PTE):
    - i. Are you doing some sort of welding with the heating torches?
      1. **No welding is taking place in this process. The heating torch keeps the ladle hot enough to prevent molten metal from solidifying / freezing off to the surface of the ladle.**



- ii. What are you heating (type of metal)?
  1. **The inner surface of the ladle (refractory) is heated by the torch. The inner refractory lining is the contact point for the molten metal in the process.**
  
- c. Sintering station furnace: What type of metals are you heating and molding together?
  - i. **The sintering station serves to heat / cure the refractory of a caster that is used in the production of metal rods from the molten alloy. The torch of the sintering station does not heat metal but rather is used to heat the refractory of the caster to remove any residual moisture prior to the addition of molten metal in the process.**

Please let us know if you have any additional questions or need further clarification.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Thursday, March 14, 2024 3:22 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

Hello,

I am looking at your calcs some more. What are you doing with your new units?  
(6) Air Melt Atomization Tower burners (Thermal Jet): What type of metal are you heating with the burners?  
Rod/Wire casting process heating torch (Torch PTE): Are you doing some sort of welding with the heating torches? What are you heating (type of metal)?  
Sintering station furnace: What type of metals are you heating and molding together?

Thanks,



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Thursday, February 29, 2024 2:56 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

Sarah,

Thank you for the follow up email. Please see below for the details you requested.

1. The word docs and calculations spreadsheet submitted via email (excel file) are the most current.
2. The units requested to be added to the permit have already been constructed and are currently in use. The units were recently identified by KMT as having been omitted from the previous permit(s) after a review of the modification to the Registration/Permit completed by IDEM in August of 2023.
  - a. The approximate installation dates are as follows:
    - i. Air Melt Atomization Tower burners (circa 1985)
    - ii. Rod/Wire casting process heating torch (Installed 2011)
    - iii. Process dust collector (DC12) originally installed 2011 and will be repurposed at the finishing line upon permit/registration modification.
    - iv. Sintering station furnace (Installed 2011)
3. As previously mentioned, the combustion sources are currently operating on propane and will be switched to natural gas upon completion of the permit/registration modification.

If you have any other questions, please let me know.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, February 26, 2024 3:00 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** IDEM OAQ Contact Information for Application No. 039-47548-00078 for Kennametal Stellite LP

Dear Randy Porter and Matthew Graves,

I am the permit writer assigned to the current application No. 039-47548-00078 for Kennametal Stellite LP. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

Am I correct in assuming the calculations spreadsheet and permit markup which Mr. Graves sent to my email on 2/20/2024 are the most up-to-date versions? If not, send me the most recent excel and word documents. Have the new units been constructed already? When were they, or when will they be, constructed?

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If Kennametal Stellite LP would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Heath Hartley) may be contacted at 317-232-8217 or [HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov).

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Sarah Germann  
Environmental Manager, Office of Air Quality  
Indiana Department of Environmental Management  
Direct Phone: 317-234-6555  
Fax: 317-232-6749  
Email: [SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Randy Porter](#); [Graves, Matt](#)  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Monday, April 1, 2024 1:35:00 PM  
**Attachments:** [image001.png](#)  
[47548calcs.xlsx](#)  
[47548let.docx](#)  
[47548per.docx](#)  
[47548tsd.docx](#)

---

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**Appendix A: Emissions Calculations  
PTE Summary**

**Company Name: Kennametal Stellite LP  
Address City IN Zip: 1201 Eisenhower Dr N, Goshen, IN 46526  
Administrative Amendment Number: 039-47548-00078  
Reviewer: Sarah Germann**

Emission Unit	Uncontrolled Potential to Emit (tons/yr)							Single Highest HAP (Chromium)
	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	
Powder coating Booth A	7.67	7.67	7.67	-	-	-	-	5.40
Dust Collectors	11.87	1.19	1.19	-	-	-	-	2.07
Emergency Generator	0.12	0.12	0.12	0.11	1.73	0.14	0.37	-
Casting process heating torch	2.65E-03	0.01	0.01	8.37E-04	0.14	0.01	0.12	1.95E-06
Six (6) Thermal Jets (tower burners)	2.04E-03	0.01	0.01	6.44E-04	0.11	0.01	0.09	1.50E-06
Sintering Station furnace	0.05	0.20	0.20	0.02	2.58	0.14	2.16	3.61E-05
<b>Total</b>	<b>19.71</b>	<b>9.19</b>	<b>9.19</b>	<b>0.13</b>	<b>4.55</b>	<b>0.30</b>	<b>2.74</b>	<b>7.47</b>

\* PM2.5 listed is direct PM2.5

**Appendix A: Emission Calculations  
PTE Summary**

**Company Name:** Kennametal Stellite LP  
**Source Address:** 1201 Eisenhower Dr N, Goshen, IN 46526  
**Permit Number:** 039-47548-00078  
**Reviewer:** Sarah Germann

<b>Uncontrolled Potential to Emit HAPs (ton/year)</b>							
Pollutant/Emission Unit	Spray Booth A*	Dust Collectors	Emergency Generator	Casting process heating torch	Six (6) Thermal Jets (tower burners)	Sintering Station furnace	Total Each HAP
Acetaldehyde	--	--	2.99E-04	--	--	--	2.99E-04
Acrolein	--	--	3.61E-05	--	--	--	3.61E-05
Benzene	--	--	3.64E-04	2.93E-06	2.25E-06	5.41E-05	4.23E-04
1,3-Butadiene	--	--	1.53E-05	--	--	--	1.53E-05
Cadmium	--	--	--	1.54E-06	1.18E-06	2.83E-05	3.11E-05
Chromium	5.40	2.07	--	1.95382E-06	1.50E-06	3.61E-05	7.47E+00
Cobalt	0.77	4.25	--	--	--	--	5.02E+00
Dichlorobenzene	--	--	--	1.67E-06	1.29E-06	3.09E-05	3.39E-05
Formaldehyde	--	--	4.60E-04	1.05E-04	8.05E-05	1.93E-03	2.58E-03
Hexane	--	--	--	2.51E-03	1.93E-03	4.64E-02	5.08E-02
Lead	--	--	--	6.98E-07	5.37E-07	1.29E-05	1.41E-05
Manganese	--	--	--	5.30E-07	4.08E-07	9.79E-06	1.07E-05
Nickel	1.53	2.26	--	2.93074E-06	2.25E-06	5.41E-05	3.80E+00
Toluene	--	--	1.60E-04	4.75E-06	3.65E-06	8.76E-05	2.56E-04
Xylene	--	--	1.11E-04	--	--	--	1.11E-04
<b>Worst Case Single HAP (Chromium)</b>							<b>7.47</b>
<b>Totals</b>	<b>6.93</b>	<b>8.59</b>	<b>1.45E-03</b>	<b>2.63E-03</b>	<b>2.03E-03</b>	<b>4.86E-02</b>	<b>15.57</b>

Note:

\*Combined HAP total for the spray booth is based on the alloy with the highest HAP content, so combined HAP entry is not the sum of the rows above.

**Appendix A: Emissions Calculations  
Modification**

**Company Name: Kennametal Stellite LP  
Source Address: 1201 Eisenhower Dr N, Goshen, IN 46526  
Permit Number: 039-47548-00078  
Reviewer: Sarah Germann**

Uncontrolled Potential to Emit of New and Modified Units (tons/year)										
Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Combined HAPs	Single HAP (Cobalt)	
<b>New Units</b>										
Casting process heating torch	2.65E-03	0.01	0.01	8.37E-04	0.14	0.01	0.12	2.63E-03	2.51E-03	Hexane
Six (6) Thermal Jets (tower burners)	2.04E-03	0.01	0.01	6.44E-04	0.11	0.01	0.09	2.03E-03	1.93E-03	Hexane
Sintering Station furnace	0.05	0.20	0.20	0.02	2.58	0.14	2.16	4.86E-02	4.64E-02	Hexane
Linishing Line (Dust Collector DC12)	5.48	0.55	0.55	-	-	-	-	3.96	1.96	Cobalt
<i>PTE of New Units</i>	<i>5.53</i>	<i>0.76</i>	<i>0.76</i>	<i>0.02</i>	<i>2.82</i>	<i>0.16</i>	<i>2.37</i>	<i>4.02</i>	<i>1.96</i>	<i>Cobalt</i>
<b>Total PTE Increase (tons/year):</b>	<b>5.53</b>	<b>0.76</b>	<b>0.76</b>	<b>0.02</b>	<b>2.82</b>	<b>0.16</b>	<b>2.37</b>	<b>4.02</b>	<b>1.96</b>	<b>Cobalt</b>

\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>

**Appendix A: Emission Calculations  
VOC and PM/PM10 Emissions  
Laboratory Powder Coating Process**

**Company Name: Kennametal Stellite LP  
Address City IN Zip: 1201 Eisenhower Dr N, Goshen, IN 46526  
Administrative Amendment Number: 039-47548-00078  
Reviewer: Sarah Germann**

Unit ID	Process	Maximum Usage (lbs/hr)	**Maximum Spray Time (hrs/yr)	Transfer Efficiency	*PM/PM10/PM2.5 Potential (lb/hr)	*PM/PM10/PM2.5 Potential (ton/yr)	Control Eff. %	Controlled PM/PM10/PM2.5 (ton/yr)
A	R&D	20	1095	30%	14.00	7.67	99%	0.08

\* Assume all the PM emissions are PM10 and PM2.5 emissions.

\*\* The maximum spray time is based on 1.75 hr setup time for each 0.25 hr coating R&D project:

8,760 hr/yr \* 0.25 spray hr / (1.75 + 0.25 ) project hr = 1,095 hr/yr

Source provided transfer efficiency of 30% based on operating experience

**METHODOLOGY**

Potential VOC (lbs/hr) = Max. Usage (lbs/hr) \* Weight % Organics

Potential VOC (tons/yr) = Max. Usage (lbs/hr) \* Weight % Organics \* (8760 hr/yr) \* (1 ton/2000 lbs)

Potential PM/PM10 (lbs/hr) = Max. Usage (lbs/hr) \* (1- Weight % Volatile) \* (1-Transfer Efficiency)

Potential PM/PM10 (tons/yr) = Max. Usage (lbs/hr) \* (1- Weight % Volatile) \* (1-Transfer Efficiency) \* Max. Spray Time (hrs/yr) \*(1 ton/2000 lbs)



**Appendix A: Emission Calculations  
HAP Emissions  
Laboratory Spray Booth with Powder Coating Process**

**Company Name: Kennametal Stellite LP  
Address City IN Zip: 1201 Eisenhower Dr N, Goshen, IN 46526  
Administrative Amendment Number: 039-47548-00078  
Reviewer: Sarah Germann**

Booth	Coatings*	Maximum Usage (lbs/hr)	Maximum Spray Time** (hrs/yr)	Transfer Efficiency (%)	Weight % Chromium	Chromium Emissions (lb/hr)	Chromium Emissions (tons/yr)	Weight % Nickel	Nickel Emissions (lb/hr)	Nickel Emissions (tons/yr)	Weight % Cobalt	Cobalt Emissions (lb/hr)	Cobalt Emissions (tons/yr)	Combined HAPs (lb/hr)	Combined HAPs (tons/yr)
A	Stelcar 9135	20.0	1,095	30%	70.4%	9.86	5.40	20.0%	2.80	1.53	0.0%	0.00	0.00	12.66	6.93
A	Stelcar 9120	20.0	1,095	30%	4.0%	0.56	0.31	0.0%	0.00	0.00	10.0%	1.40	0.77	1.96	1.07
Booth A worst case before controls***						9.86	5.40		2.80	1.53		1.40	0.77	12.66	6.93
Total after controls				control efficiency	99%	0.10	0.05		0.03	0.02		0.01	0.01	0.13	0.07

\* These coatings are not produced at the source, they are purchased for resale and R&D

\*\* The maximum spray time is based on 1.75 hr setup time for each 0.25 hr coating R&D project:

8,760 hr/yr \* 0.25 spray hr / (1.75 + 0.25 ) project hr = 1,095 hr/yr

\*\*\* Only one type of coating can be applied for each booth at the same time. Therefore, the worst case scenario is using the highest HAP content coating.

Source provided transfer efficiency of 30% based on operating experience

**METHODOLOGY**

HAPs emission rate (tons/yr) = Max. Usage (lbs/hr) x (1- Transfer Efficiency) x Weight % HAP x Max. Spray Time (hrs/yr) x 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Dust Collectors for Manufacturing Processes**

Company Name: Kennametal Stellite LP  
Address City IN Zip: 1201 Eisenhower Dr N, Goshen, IN 46526  
Administrative Amendment Number: 039-47548-00078  
Reviewer: Sarah Germann

**Particulate**

Emission Unit ID	Unit ID/Control Device	Actual Quantity of Dust lb/hr	Control Efficiency	Before Controls			After Controls		
				PM Emissions (tons/yr)	PM10 Emissions <sup>2</sup> (tons/yr)	PM2.5 Emissions <sup>2</sup> (tons/yr)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)	PM2.5 Emissions (tons/yr)
DC1	Air Melt Tower	0.247	99.90%	1.08	0.11	0.11	1.08E-03	1.08E-04	1.08E-04
DC2-1	Fume Hood <sup>3,6</sup>	0.195	99.90%	0.85	0.09	0.09	8.53E-04	8.53E-05	8.53E-05
DC3	Air Melt Tower <sup>4</sup>	0.247	99.90%	1.08	0.11	0.11	1.08E-03	1.08E-04	1.08E-04
DC4	Cobalt Classifying	0.024	99.90%	0.11	0.01	0.01	1.05E-04	1.05E-05	1.05E-05
DC5	Iron/Nickel Classifying	0.549	99.90%	2.41	0.24	0.24	2.41E-03	2.41E-04	2.41E-04
DC7	Castable Rework <sup>5</sup>	0.123	99.90%	0.54	0.05	0.05	5.39E-04	5.39E-05	5.39E-05
DC9	Rod/Wire Casting <sup>5</sup>	0.073	99.90%	0.32	0.03	0.03	3.20E-04	3.20E-05	3.20E-05
DC12	Linishing Line <sup>6a</sup>	1.250	99.90%	5.48	0.55	0.55	5.48E-03	5.48E-04	5.48E-04
<b>Total PTE</b>				<b>11.87</b>	<b>1.19</b>	<b>1.19</b>	<b>1.19E-02</b>	<b>1.19E-03</b>	<b>1.19E-03</b>

**Notes**

- Maximum quantities of PM collected per hour provided by source, ref. R039-14366-00078
- PM10 and PM2.5 are considered to be 10% of the PM emissions, ref. R039-14366-00078
- New dust collector installed in 2006, no change in PTE, ref. R039-27309-00078
- Air melt atomization tower replaced original vacuum melt tower in 2007, PTE assumed the same as DC1, ref. R039-25404-00078
- New DC9 installed for castable rework process - no change in process PTE, DC6 moved to new rod/wire casting process - PTE assumed the same as induction furnace fume hood (DC2), 2010, ref. R039-29603-00078
- Fume hood PTE revised based on replacement specs for Baghouse DC-2.
- Throughput based on 8760 hrs/year at maximum of 50 lbs/hr. Typical usage is approximately 15 lbs/hr.

**HAPs**

Emission Unit ID	Unit ID/Control Device	PM Emissions before Controls <sup>8</sup> (tons/yr)	Uncontrolled HAP PTE Estimate <sup>7</sup>					
			Chromium content (wt %)	Chromium emissions (tons/yr)	Nickel content (wt %)	Nickel emissions (tons/yr)	Cobalt content (wt %)	Cobalt emissions (tons/yr)
DC1	Air Melt Tower	1.08	17%	0.19	19%	0.21	36%	0.39
DC2-1	Fume Hood	0.85	17%	1.49E-01	19%	1.63E-01	36%	3.06E-01
DC3	Air Melt Tower	1.08	17%	0.19	19%	0.21	36%	0.39
DC4	Cobalt Classifying	0.11	17%	1.83E-02	19%	2.01E-02	36%	3.77E-02
DC5	Iron/Nickel Classifying	2.41	17%	0.42	19%	0.46	36%	8.62E-01
DC7	Castable Rework <sup>9</sup>	0.54	17%	9.40E-02	19%	1.03E-01	36%	1.93E-01
DC9	Rod/Wire Casting	0.32	17%	5.58E-02	19%	6.10E-02	36%	1.15E-01
D12	Linishing Line <sup>6a</sup>	5.48	17%	9.55E-01	19%	1.05E+00	36%	1.96E+00
<b>worst-case single HAP</b>				<b>2.07</b>		<b>2.26</b>		<b>4.25</b>
<b>worst case combined HAPs</b>						<b>8.59</b>		

**Notes** (numbers continued from table above)

- Source provided waste characterization data for the dust
- PM emissions are the same as the table above
- Castable rework emissions from removing refractory liner from furnaces, particulate assumed to be 90% refractory/10% Stellite alloys

Emission Unit ID	Unit ID/Control Device	Control Efficiency	Controlled HAP PTE Estimate		
			Chromium emissions (tons/yr)	Nickel emissions (tons/yr)	Cobalt emissions (tons/yr)
DC1	Air Melt Tower	99.9%	1.89E-04	2.07E-04	3.88E-04
DC2-1	Fume Hood	99.9%	1.49E-04	1.63E-04	3.06E-04
DC3	Air Melt Tower	99.9%	1.89E-04	2.07E-04	3.88E-04
DC4	Cobalt Classifying	99.9%	1.83E-05	2.01E-05	3.77E-05
DC5	Iron/Nickel Classifying	99.9%	4.20E-04	4.59E-04	8.62E-04
DC7	Castable Rework	99.9%	9.40E-05	1.03E-04	1.93E-04
DC9	Rod/Wire Casting	99.9%	5.58E-05	6.10E-05	1.15E-04
DC12	Linishing Line <sup>6a</sup>	99.9%	9.55E-04	1.05E-03	1.96E-03
<b>worst-case single HAP</b>			<b>2.07E-03</b>	<b>2.26E-03</b>	<b>4.25E-03</b>
<b>worst case combined HAPs</b>			<b>8.59E-03</b>		

**Methodology**

Emissions before controls, lb/hr = Actual Quantity of Dust Collected (lbs/hr) / control efficiency, %  
Emissions before controls, US tons/yr = (Emissions before controls, lb/hr) x (8760 hr/yr) / (2000 lb/US ton)  
Emissions after controls = Emissions before controls x (1 - control efficiency, %)  
New DC-2 Baghouse Actual Quantity of Dust Collected (lb/hr) = Old Baghouse Actual Quantity of Dust Collected (lb/hr) x [New Baghouse Air Volume (ACFM) / Old Baghouse Air Volume (ACFM)]

326 IAC 6-3-2 Evaluations

Emission Unit	Process Weight Rate (tons/hr)	PM Allowable Emission Rate (lbs/hr)	PM Potential to Emit (tons/yr)	Control Required to Meet Limit?
Linishing Line	0.03	0.35	5.48	Yes

**Appendix A: Emission Calculations  
Reciprocating Internal Combustion Engines - Diesel Fuel  
Output Rating (<=600 HP)  
Maximum Input Rate (<=4.2 MMBtu/hr)**

**Company Name:** Kennametal Stellite LP  
**Source Address:** 1201 Eisenhower Dr N, Goshen, IN 46526  
**Permit Number:** 039-47548-00078  
**Reviewer:** Sarah Germann

**Emissions calculated based on output rating (hp)**

Output Horsepower Rating (hp)	223.0
Maximum Hours Operated per Year	500
Potential Throughput (hp-hr/yr)	111,500

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.00205	0.0310	0.0025	0.00668
Potential Emission in tons/yr	0.12	0.12	0.12	0.11	1.73	0.14	0.37

\*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

**Hazardous Air Pollutants (HAPs)**

	Pollutant							Total PAH HAPs***
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	3.64E-04	1.60E-04	1.11E-04	1.53E-05	4.60E-04	2.99E-04	3.61E-05	6.56E-05

\*\*\*PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

\*\*\*\*Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

<b>Potential Emission of Total HAPs (tons/yr)</b>	<b>1.51E-03</b>
---	-----------------

**Methodology**

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.3-1 and 3.3-2.

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] \* [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] \* [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

**Appendix A: Emissions Calculations  
Natural Gas Combustion ( ≤ 100 MMBtu/hr)  
Rod/Wire Casting Process Heating Torch**

**Company Name:** Kennametal Stellite LP  
**Source Address:** 1201 Eisenhower Dr N, Goshen, IN 46526  
**Permit Number:** 039-47548-00078  
**Reviewer:** Sarah Germann

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.325	1020	2.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	2.65E-03	0.01	0.01	8.37E-04	0.14	0.01	0.12

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All 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 #1-02-006-02, 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

Potential Emission (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Hazardous Air Pollutants (HAPs)**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.9E-06	1.7E-06	1.0E-04	2.5E-03	4.7E-06

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	7.0E-07	1.5E-06	2.0E-06	5.3E-07	2.9E-06

<b>Potential Emission of Combined HAPs (tons/yr)</b>	<b>2.6E-03</b>
<b>Potential Emission of Highest Single HAP (tons/yr)</b>	<b>2.5E-03</b>

Hexane

**Methodology**

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.

**Note:**

Welding is not taking place in this process.

The heating torch is used to keep the ladle of the casting process hot enough to prevent molten metal from solidifying to the surface of the ladle.

There is no melting of metal, so there are not any process emissions for this unit.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion ( $\leq 100$  MMBtu/hr)**  
**Six (6) Thermal Jets/Air Melt Automization Tower Burners for Heating Tundish**

**Company Name:** Kennametal Stellite LP  
**Source Address:** 1201 Eisenhower Dr N, Goshen, IN 46526  
**Permit Number:** 039-47548-00078  
**Reviewer:** Sarah Germann

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.25	1020	2.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	2.04E-03	0.01	0.01	6.44E-04	0.11	0.01	0.09

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All 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 #1-02-006-02, 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

Potential Emission (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Hazardous Air Pollutants (HAPs)**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.3E-06	1.3E-06	8.1E-05	1.9E-03	3.7E-06

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.4E-07	1.2E-06	1.5E-06	4.1E-07	2.3E-06

<b>Potential Emission of Combined HAPs (tons/yr)</b>	<b>2.0E-03</b>
<b>Potential Emission of Highest Single HAP (tons/yr)</b>	<b>1.9E-03</b>

Hexane

**Methodology**

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.

**Note:**

The six burners are used to heat up the tundish and keep molten alloy which is poured into it from solidifying on the surface.

The molten alloy then enters the tower where it is converted to a powder for additional processing.

These burners are not actually heating the metal, so there are not any process emissions for these units.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion ( ≤ 100 MMBtu/hr)**  
**Furnace at the Sintering station to heat Refractory of Caster**

**Company Name:** Kennametal Stellite LP  
**Source Address:** 1201 Eisenhower Dr N, Goshen, IN 46526  
**Permit Number:** 039-47548-00078  
**Reviewer:** Sarah Germann

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
6.00	1020	51.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.05	0.20	0.20	0.02	**see below	0.14	2.16

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All 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 #1-02-006-02, 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

Potential Emission (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Hazardous Air Pollutants (HAPs)**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.4E-05	3.1E-05	1.9E-03	4.6E-02	8.8E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.3E-05	2.8E-05	3.6E-05	9.8E-06	5.4E-05

<b>Potential Emission of Combined HAPs (tons/yr)</b>	<b>4.9E-02</b>
<b>Potential Emission of Highest Single HAP (tons/yr)</b>	<b>4.6E-02</b>

Hexane

**Methodology**

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.

**Note:**

The sintering station heats/cures the refractory of a caster used in the production of retal rods from molten alloy.

The torch at the sintering station does not heat metal. It heats the refractory of the caster to remove residual moisture prior to the addition of molten metal.

This furnace unit does not directly heat metal, so there are not any process emissions for this unit.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

Randy Porter  
Kennametal Stellite LP  
1201 Eisenhower Drive North  
Goshen, IN 46526

Re: 039-47548-00078  
Revision to  
Registration No. R039-14366-00078

Dear Randy Porter:

Kennametal Stellite LP was issued a Registration No. R039-14366-00078 on August 7, 2001 for a stationary metal powder manufacturing facility located at 1201 Eisenhower Dr. N, Goshen, IN 46526. On February 20, 2024, the Office of Air Quality (OAQ) received an application from the source requesting to add six (6) Air Melt Atomization Tower burners, one (1) rod/wire casting process heating torch, one (1) natural gas furnace for sintering, and one (1) dust collector on the Linishing line exhausting to Baghouse DC5. Pursuant to the provisions of 326 IAC 2-5.5-6(g), a Registration Revision is hereby approved as described in the attached Technical Support Document.

The source shall continue to operate according to 326 IAC 2-5.5 (Registrations). All other conditions of the registration shall remain unchanged and in effect. Please find attached the entire registration as revised. The registration references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this revision:

- Attachment A: 40 CFR 60, Subpart IIII, NSPS Stationary Compression Ignition Internal Combustion Engines
- Attachment B: 40 CFR 63, Subpart ZZZZ, NESHAP Stationary Reciprocating Internal Combustion Engines

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <https://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.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl).

A copy of the registration is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the application and registration is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <https://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. 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: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Sarah Germann, 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) 234-6555 or (800) 451-6027, and ask for Sarah Germann or (317) 234-6555.

Sincerely,

Heath Hartley, Section Chief  
Permits Branch  
Office of Air Quality

Attachment(s): Revised Registration and Technical Support Document

cc: File - Elkhart County  
Elkhart County Health Department  
Compliance and Enforcement Branch  
IDEM Northern Regional Office





# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

## REGISTRATION OFFICE OF AIR QUALITY

**Kennametal Stellite LP  
1201 Eisenhower Dr N  
Goshen, Indiana 46526**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R039-14366-00078 Master Agency Interest ID.: 11625	
Issued by: Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: August 7, 2001

Registration Revision No. 039-15682-00078, issued on February 3, 2003  
Notice-Only Change No. 039-23709-00078, issued on October 24, 2006  
Notice-Only Change No. 039-25404-00078, issued on October 31, 2007  
Notice-Only Change No. 039-29603-00078, issued on December 29, 2010  
Notice-Only Change No. 039-31339-00078, issued on February 8, 2012  
Administrative Amendment No. 039-33899-00078, issued on February 4, 2014  
Administrative Amendment No.039-35083-00078, issued on January 9, 2015  
Administrative Amendment No.039-36424-00078, issued on November 23, 2015  
Administrative Amendment No. 039-39438-00078, issued on January 30, 2018  
Administrative Amendment No. 039-40090-00078, issued on July 17, 2018  
Administrative Amendment No.039-46685-00078, issued on August 9, 2023

Registration Revision No.039-47548-00078	
Issued by:  Heath Hartley, Section Chief Permits Branch Office of Air Quality	Issuance Date:

## SECTION A

## SOURCE SUMMARY

This registration 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

### A.1 General Information

---

The Registrant owns and operates a stationary metal powder manufacturing facility.

Source Address: 1201 Eisenhower Dr N, Goshen, Indiana 46526  
General Source Phone Number: (574) 534-2585  
SIC Code: 3369 (Nonferrous Foundries, Except Aluminum and Copper)  
County Location: Elkhart County  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Registration

### A.2 Emission Units and Pollution Control Equipment Summary

---

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

- (a) Air Melt Atomization Towers furnaces, each equipped with a product cyclone that is considered integral to the process, and with two (2) fume hoods, located over the furnaces in the atomization towers, constructed in 2006, controlled by baghouse DC2-1, as follows:

Construction year	Maximum Capacity (pounds/hour)	Baghouse ID
1990	800	DC1
2007	800	DC3

- (b) Six (6) Air Melt Atomization Tower natural gas-fired burners, permitted in 2024 with a maximum capacity of 0.25 MMBTU/hr, each, using no controls. The burners are used to heat up the tundish and keep molten alloy poured into the tundish from solidifying on the surface of the tundish.
- (c) One (1) Cobalt classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC4.
- (d) One (1) Iron/Nickel classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC5.
- (e) One (1) castable rework operation, constructed in 1990, approved in 2014 for modification, with a maximum process rate of less than 100 pounds per hour, controlled by Baghouse DC7.
- (f) One (1) Rod/Wire Casting fume hood, approved for construction in 2010, with a maximum process rate of less than 100 pounds per hour, controlled by fume hood/Baghouse DC9.
- (g) One (1) Rod/Wire Casting process natural gas-fired heating torch, installed in 2011, and permitted in 2024, with a maximum capacity of 0.325 MMBTU/hr, using no controls. This

heating torch keeps the ladle hot enough to prevent molten metal from solidifying to the surface of the ladle.

- (h) One (1) welding powder coating spray booth, identified as Booth A, constructed in 2002, using a maximum usage of 20 pounds per hour and a maximum throughput rate of 24 pounds of parts per hour, controlled by Baghouse DC8. This booth is located in the Research and Development Laboratory and is used only for experimental study and testing for welding torches.
- (i) One (1) general ventilation baghouse, identified as DC-10, permitted in 2015, for ambient room dust collection and increased airflow, and exhausting within the building.
- (j) Two (2) general ventilation dust collectors, identified as DC-11 and DC2, permitted in 2018, for ambient room dust collection and increased airflow, and exhausting within the building.
- (k) One (1) finishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.
- (l) One (1) emergency diesel generator, identified as Gen1, permitted in 2023, with heat input capacity of 1.47 MMBtu/hr and a power output of 223 hp, using no controls, and exhausting to Stk1.

Under 40 CFR 60, Subpart IIII, this unit is considered an affected facility.

Under 40 CFR 63, Subpart ZZZZ, this unit is considered an affected new facility.

- (m) One (1) Secondary Metal Production natural gas fired furnace at the sintering station, installed in 2011, and permitted in 2024, with a maximum capacity of 6.0 MMBTU/hr, using no controls, and venting to DC-10. This unit heats the refractory of the caster to remove residual moisture prior to the addition of molten metal to the process.

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-1.1-1]

---

Terms in this registration 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 2-1.1-1) shall prevail.

### B.2 Effective Date of Registration [IC 13-15-5-3]

---

Pursuant to IC 13-15-5-3, this registration R039-14366-00078 is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

### B.3 Registration Revocation [326 IAC 2-1.1-9]

---

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

### B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

---

- (a) All terms and conditions of permits established prior to Registration No. 039-14366-00078 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 registration.

### B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)][326 IAC 2-5.5-4(a)(3)]

---

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 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, IN 46204-2251

- (c) The notification 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.

**B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]**

---

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

**B.7 Registrations [326 IAC 2-5.1-2(i)]**

---

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

**B.8 Preventive Maintenance Plan [326 IAC 1-6-3]**

---

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant 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 Registrant shall implement the PMPs.

- (b) 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 Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-5.1-2(g)][326 IAC 2-5.5-4(b)]

#### C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

### Corrective Actions and Response Steps

#### C.3 Response to Excursions or Exceedances [326 IAC 2-5.1-3(e)(2)]

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

- (a) The Registrant 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 Registrant 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 registration.
- (e) The Registrant shall record the reasonable response steps taken.

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)]**

**C.4 General Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)]**

---

- (a) Records of all required monitoring data, reports and support information required by this registration shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 Registrant, the Registrant shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this registration, for all record keeping requirements not already legally required, the Registrant shall be allowed up to ninety (90) days from the date of registration issuance or the date of initial start-up, whichever is later, to begin such record keeping.

**SECTION D.1**

**EMISSION UNIT OPERATION CONDITIONS**

Facility Description [326 IAC 2-5.1-2(f)(2)][326 IAC 2-5.5-4(a)(2)]:

- (a) Air Melt Atomization Towers furnaces, each equipped with a product cyclone that is considered integral to the process, and with two (2) fume hoods, located over the furnaces in the atomization towers, constructed in 2006, controlled by baghouse DC2-1, as follows:

Construction year	Maximum Capacity (pounds/hour)	Baghouse ID
1990	800	DC1
2007	800	DC3

- (b) One (1) Cobalt classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC4.
- (c) One (1) Iron/Nickel classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC5.
- (d) One (1) castable rework operation, constructed in 1990, approved in 2014 for modification, with a maximum process rate of less than 100 pounds per hour, controlled by Baghouse DC7.
- (e) One (1) Rod/Wire Casting fume hood, approved for construction in 2010, with a maximum process rate of less than 100 pounds per hour, controlled by fume hood/Baghouse DC9.
- (f) One (1) welding powder coating spray booth, identified as Booth A, constructed in 2002, using a maximum usage of 20 pounds per hour and a maximum throughput rate of 24 pounds of parts per hour, controlled by Baghouse.DC8. This booth is located in the Research and Development Laboratory and is used only for experimental study and testing for welding torches.
- (g) One (1) general ventilation baghouse, identified as DC-10, permitted in 2015, for ambient room dust collection and increased airflow, and exhausting within the building.
- (h) One (1) finishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

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

**Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)][326 IAC 2-5.5-4(a)(1)]**

**D.1.1 Particulate [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the processes listed in the table below shall not exceed the following:



Emission Unit	Process Weight Rate (lbs/hr)	Allowable PM Limit (lbs/hr)
two (2) air melt atomization towers/DC1 and DC3	800, each	2.22, each
cobalt classifying operation/DC4	975	2.53
iron/nickel classifying operation/DC5	975	2.53
Linishing Line	50	0.35

The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions from the fume hood, the castable rework, and the Rod/Wire Casting fume hood, and the welding powder spray coating booth (Booth A) shall not exceed 0.551 lbs/hr each.

#### D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

#### Compliance Determination Requirements [326 IAC 2-5.1-2(g)][326 IAC 2-5.5-4(b)]

##### D.1.3 Cyclone Operations

In order to assure compliance with Condition D.1.1(a), the product cyclones associated with both air melt atomization towers must be in operation when the towers are in operation, as they are considered integral part of the process.

##### D.1.4 Baghouse Operations

In order to assure compliance with Condition D.1.1(b), the baghouses shall be in operation and control emissions from the associated processes at all times when these processes are in operation.

#### Compliance Monitoring Requirements [326 IAC 2-5.1-2(g)][326 IAC 2-5.5-4(b)]

##### D.1.5 Cyclone Inspection

An inspection shall be performed each calendar quarter of all cyclones controlling the two (2) air melt atomization towers, when exhausting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

##### D.1.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps shall be considered a deviation from this permit

#### Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)][326 IAC 2-5.5-4(b)]

#### D.1.7 Record Keeping Requirements

---

- (a) To document the compliance status with Condition D.1.3, the Permittee shall maintain records of the inspections required under Condition D.1.5.
  
- (b) Section C - General Record Keeping Requirements contains the Registrant's obligations with regard to the records required by this condition.

**SECTION E.1**

**NSPS**

**Emission Unit Description:**

- (a) One (1) emergency diesel generator, identified as Gen1, permitted in 2023, with a heat input capacity of 1.47 MMBtu/hr and a power output of 223 hp, using no controls, and exhausting to Stk1.

Under 40 CFR 60, Subpart IIII, this unit is considered an affected facility.  
Under 40 CFR 63, Subpart ZZZZ, this unit is considered an affected new facility.

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

**E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]**

- (a) Pursuant to 40 CFR 60.1, the Registrant shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart IIII.

- (b) Pursuant to 40 CFR 60.4, the Registrant shall submit all required notifications and reports 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

and

United States Environmental Protection Agency, Region 5  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**E.1.2 Stationary Compression Ignition Internal Combustion Engines NSPS [326 IAC 12][40 CFR Part 60, Subpart IIII]**

The Registrant shall comply with the following provisions of 40 CFR Part 60, Subpart IIII (included as Attachment A to the registration), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

- (1) 40 CFR 60.4200(a)(2)(i), (a)(4), and (c)
- (2) 40 CFR 60.4205(b)
- (3) 40 CFR 60.4206
- (4) 40 CFR 60.4207(b)
- (5) 40 CFR 60.4208(a)
- (6) 40 CFR 60.4209(a)
- (7) 40 CFR 60.4211(a), (c), (f), and (g)(2)
- (8) 40 CFR 60.4214(b), and (d)
- (9) 40 CFR 60.4218
- (10) 40 CFR 60.4219
- (11) Table 5 to 40 CFR 60, Subpart IIII

(12) Table 8 to 40 CFR 60, Subpart IIII

**SECTION E.2**

**NESHAP**

**Emission Unit Description:**

- (a) One (1) emergency diesel generator, identified as Gen1, permitted in 2023, with a heat input capacity of 1.47 MMBtu/hr and a power output of 223 hp, using no controls, and exhausting to Stk1.

Under 40 CFR 60, Subpart IIII, this unit is considered an affected facility.  
Under 40 CFR 63, Subpart ZZZZ, this unit is considered an affected new facility.

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

**E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]**

- (a) Pursuant to 40 CFR 63.1 the Registrant shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

- (b) Pursuant to 40 CFR 63.10, the Registrant shall submit all required notifications and reports 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

and

United States Environmental Protection Agency, Region 5  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**E.2.2 Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]**

The Registrant shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B to the registration), which are incorporated by reference as 326 IAC 20-82, for the emission unit(s) listed above:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
- (4) 40 CFR 63.6595(a)(7)
- (5) 40 CFR 63.6665
- (6) 40 CFR 63.6670
- (7) 40 CFR 63.6675

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**REGISTRATION  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	Kennametal Stellite LP
<b>Address:</b>	1201 Eisenhower Dr N
<b>City:</b>	Goshen, Indiana 46526
<b>Phone Number:</b>	(574) 534-2585
<b>Registration No.:</b>	039-14366-00078

I hereby certify that Kennametal Stellite LP is:

still in operation.

I hereby certify that Kennametal Stellite LP is:

no longer in operation.

in compliance with the requirements of Registration No. 039-14366-00078.

not in compliance with the requirements of Registration No. 039-14366-00078.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Phone Number:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Registration Revision**

**Source Description and Location**

<b>Source Name:</b>	<b>Kennametal Stellite LP</b>
<b>Source Location:</b>	<b>1201 Eisenhower Dr. N, Goshen, IN 46526</b>
<b>County:</b>	<b>Elkhart (Elkhart Township)</b>
<b>SIC Code:</b>	<b>3369 (Nonferrous Foundries, Except Aluminum and Copper)</b>
<b>Registration No.:</b>	<b>R 039-14366-00078</b>
<b>Registration Issuance Date:</b>	<b>August 7, 2001</b>
<b>Registration Revision No.:</b>	<b>039-47548-00078</b>
<b>Permit Reviewer:</b>	<b>Sarah Germann</b>

On February 20, 2024, the Office of Air Quality (OAQ) received an application from Kennametal Stellite LP related to changes at an existing stationary metal powder manufacturing facility.

**Existing Approvals**

The source was issued Registration No. 039-14366-00078 on August 7, 2001. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Registration Revision	039-15682-00078	February 3, 2003
Registration NOC	039-23709-00078	October 24, 2006
Registration NOC	039-25404-00078	October 30, 2007
Registration NOC	039-29603-00078	December 29, 2010
Registration NOC	039-31339-00078	February 8, 2012
Registration AA	039-33899-00078	February 4, 2014
Registration AA	039-35083-00078	January 9, 2015
Registration AA	039-36424-00078	November 23, 2015
Registration AA	039-39438-00078	January 30, 2018
Registration AA	039-40090-00078	July 17, 2018
Registration AA	039-46685-00078	August 9, 2023

**County Attainment Status**

The source is located in Elkhart County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO <sub>2</sub>	Unclassifiable or attainment effective April 9, 2018, for the 2010 primary 1-hour SO <sub>2</sub> standard. Better than national secondary standards effective March 3, 1978.
CO	Unclassifiable or attainment effective November 15, 1990.

Pollutant	Designation
O <sub>3</sub>	Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO <sub>2</sub> standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Elkhart County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
Elkhart 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

The fugitive emissions of regulated air pollutants and hazardous air pollutants (HAP) are counted toward the determination of Registration (326 IAC 2-5.1-5) 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.



**Source Status - Existing Source**

This table reflects the unrestricted potential emissions of the source prior to the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Unrestricted Source-Wide Emissions Prior to Revision (tons/year)								
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1,2</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>3</sup>	Total HAPs
Total PTE of Entire Source Including Source-Wide Fugitives	14.18	8.43	8.43	0.11	1.73	0.14	0.37	6.51	11.55
Exemptions Levels	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 10	< 25
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 10	< 25
<sup>1</sup> Under the Part 70 Permit program (40 CFR 70), PM <sub>10</sub> and PM <sub>2.5</sub> , not particulate matter (PM), are each considered as a "regulated air pollutant." <sup>2</sup> PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . <sup>3</sup> Single highest source-wide HAP.									

These emissions are based on the TSD of Registration Administrative Amendment No. 039-46685-00078, issued on August 9, 2023.

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Kennametal Stellite LP on February 20, 2024, relating to the addition of six (6) Air Melt Atomization Tower burners, one (1) rod/wire casting process heating torch, one (1) natural gas furnace for sintering, and one (1) dust collector on the Linishing line exhausting to Baghouse DC5.

The following is a list of the new and modified emission units and pollution control device(s):

- (a) Six (6) Air Melt Atomization Tower natural gas-fired burners, permitted in 2024 with a maximum capacity of 0.25 MMBTU/hr, each, using no controls. The burners are used to heat up the tundish and keep molten alloy poured into the tundish from solidifying on the surface of the tundish.
- (b) One (1) Rod/Wire Casting process natural gas-fired heating torch, installed in 2011, and permitted in 2024, with a maximum capacity of 0.325 MMBTU/hr, using no controls. This heating torch keeps the ladle hot enough to prevent molten metal from solidifying to the surface of the ladle.
- (c) One (1) Secondary Metal Production natural gas fired furnace at the sintering station, installed in 2011, and permitted in 2024, with a maximum capacity of 6.0 MMBTU/hr, using no controls, and venting to DC-10. This unit heats the refractory of the caster to remove residual moisture prior to the addition of molten metal to the process.

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) linishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

**Enforcement Issues**

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

**Emission Calculations**

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

**Permit Level Determination – Registration Revision**

The following table is used to determine the appropriate revision level under 326 IAC 2-5.5-6. This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)								
	PM	PM <sub>10</sub>	PM <sub>2.5</sub> <sup>1</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>2</sup>	Total HAPs
Casting process heating torch	negl.	0.01	0.01	negl.	0.14	0.01	0.12	negl.	negl.
Six (6) Thermal Jets (tower burners)	negl.	0.01	0.01	negl.	0.11	0.01	0.09	negl.	negl.
Sintering Station furnace	0.05	0.20	0.20	0.02	2.58	0.14	2.16	negl.	negl.
Linishing Line (Dust Collector DC12)	5.48	0.55	0.055	-	-	-	-	1.96	3.96
<b>Total PTE Before Controls of the New Emission Units:</b>	<b>5.53</b>	<b>0.76</b>	<b>0.76</b>	<b>0.02</b>	<b>2.82</b>	<b>0.16</b>	<b>2.37</b>	<b>1.96 (Cobalt)</b>	<b>4.02</b>

<sup>1</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>2</sup>Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

This Registration is being revised through a Registration Revision pursuant to 326 IAC 2-5.5-6(g), because the revision involves the construction or modification of emission units not described under 326 IAC 2-1.1-3(e)(1) through 326 IAC 2-1.1-3(e)(31).

**PTE of the Entire Source After Issuance of the Registration Revision**

The table below summarizes the after issuance source-wide unrestricted potential to emit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Unrestricted Source-Wide Emissions After Issuance (ton/year) (tons/year)c								
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1, 2</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>3</sup>	Total HAPs
Total PTE of Entire Source Including Source-Wide Fugitives	19.71	9.19	9.19	0.13	4.55	0.30	2.74	7.47	15.57
Exemptions Levels	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 10	< 25
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 10	< 25
<sup>1</sup> Under the Part 70 Permit program (40 CFR 70), PM <sub>10</sub> and PM <sub>2.5</sub> , not particulate matter (PM), are each considered as a "regulated air pollutant." <sup>2</sup> PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . <sup>3</sup> Single highest source-wide HAP.									

- (a) This proposed revision will not change the registration status of the source, because the source-wide uncontrolled/unlimited potential to emit of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, and CO will each still be within the ranges listed in 326 IAC 2-5.5-1(b)(1) and the potential to emit of all other regulated air pollutants will each still be less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source will still be subject to the provisions of 326 IAC 2-5.5 (Registrations).
- (b) This proposed revision will not change the registration status of the source, because the source-wide uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the uncontrolled/unlimited potential to emit of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). This source is an area source under Section 112 of the Clean Air Act (CAA).

**Federal Rule Applicability Determination**

Due to this proposed revision, federal rule applicability has been reviewed as follows:

**New Source Performance Standards (NSPS):**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the registration.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the registration.

**Compliance Assurance Monitoring (CAM):**

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the registration, because the unlimited potential to emit of the source is 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 - Entire Source**

Due to this proposed revision, state rule applicability has been reviewed as follows:

**326 IAC 2-5.5 (Registrations)**

Registration applicability is discussed under the PTE of the Entire Source After Issuance of the Registration Revision section of this document.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The new and modified emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**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 or Porter County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

**326 IAC 5-1 (Opacity Limitations)**

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

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) 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.

**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)**

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.5, because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

**326 IAC 6.8 (Particulate Matter Limitations for Lake County)**

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.8, because it is not located in Lake County.

<b>State Rule Applicability – Individual Facilities</b>
---

Due to this proposed revision, state rule applicability has been reviewed as follows:

Natural Gas Combustion

- 1) Tower burners
- 2) Casting Process heating torch
- 3) Sintering Station furnace

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1(b)(14), the natural gas combustion units added with this permitting action are not subject to the requirements of 326 IAC 6-3, since they each emit less than 0.551 pounds of particulate matter per hour.

**326 IAC 7-1.1 Sulfur Dioxide Emission Limitations**

These emission units are not subject to 326 IAC 326 IAC 7-1.1, because they have a potential to emit sulfur dioxide (SO<sub>2</sub>) 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, the natural gas combustion units added with this permitting action were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6, because the 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 added with this permitting action, 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 added with this permitting action, since these unit are not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Linishing Line

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Linishing Line, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not 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).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the linishing line shall not exceed 0.346 pounds per hour when operating at a process weight rate of 0.025 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

The control equipment shall be in operation at all times the linishing line is in operation, in order to comply with this limit.

<b>Proposed Changes</b>
-------------------------

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

- (1) The addition of six (6) Air Melt Atomization Tower burners, used to heat the tundish and keep molten alloy from solidifying.
- (2) The addition of one (1) rod/wire casting process heating torch, used to keep the ladle in the casting process hot enough to prevent molten metal from solidifying.
- (3) The addition of a furnace at the sintering station, used to heat the refractory of the caster, to remove residual moisture prior to introducing molten metal in the process.
- (4) The addition of dust collector DC12 at the linishing equipment line, rerouting discharge from within the building to existing baghouse DC5.

### **Additional Changes**

Upon further review, IDEM, OAQ has decided to make the following changes to the registration. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) Minor language and title updates in the B and D Sections.

\*\*\*

#### **A.2 Emission Units and Pollution Control Equipment Summary**

---

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

- (a) Air Melt Atomization Towers furnaces, each equipped with a product cyclone that is considered integral to the process, and with two (2) fume hoods, located over the furnaces in the atomization towers, constructed in 2006, controlled by baghouse DC2-1, as follows:

Construction year	Maximum Capacity (pounds/hour)	Baghouse ID
1990	800	DC1
2007	800	DC3

- (b) **Six (6) Air Melt Atomization Tower natural gas-fired burners, permitted in 2024 with a maximum capacity of 0.25 MMBTU/hr, each, using no controls. The burners are used to heat up the tundish and keep molten alloy poured into the tundish from solidifying on the surface of the tundish.**
- (bc) One (1) Cobalt classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC4.
- (ed) One (1) Iron/Nickel classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC5.
- (de) One (1) castable rework operation, constructed in 1990, approved in 2014 for modification, with a maximum process rate of less than 100 pounds per hour, controlled by Baghouse DC7.
- (ef) One (1) Rod/Wire Casting fume hood, approved for construction in 2010, with a maximum process rate of less than 100 pounds per hour, controlled by fume hood/Baghouse DC9.
- (g) **One (1) Rod/Wire Casting process natural gas-fired heating torch, installed in 2011, and permitted in 2024, with a maximum capacity of 0.325 MMBTU/hr, using no controls. This heating torch keeps the ladle hot enough to prevent molten metal from solidifying to the surface of the ladle.**
- (fh) One (1) welding powder coating spray booth, identified as Booth A, constructed in 2002, using a maximum usage of 20 pounds per hour and a maximum throughput rate of 24 pounds of parts per hour, controlled by Baghouse DC8. This booth is located in the Research and Development Laboratory and is used only for experimental study and testing for welding torches.
- (gi) One (1) general ventilation baghouse, identified as DC-10, permitted in 2015, for ambient room dust collection and increased airflow, and exhausting within the building.

- (hj) Two (2) general ventilation dust collectors, identified as DC-11 and DC2, permitted in 2018, for ambient room dust collection and increased airflow, and exhausting within the building.
- (k) **One (1) linishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.**
- (il) One (1) emergency diesel generator, identified as Gen1, permitted in 2023, with heat input capacity of 1.47 MMBtu/hr and a power output of 223 hp, using no controls, and exhausting to Stk1.

Under 40 CFR 60, Subpart IIII, this unit is considered an affected facility.  
 Under 40 CFR 63, Subpart ZZZZ, this unit is considered an affected new facility.

- (m) **One (1) Secondary Metal Production natural gas fired furnace at the sintering station, installed in 2011, and permitted in 2024, with a maximum capacity of 6.0 MMBTU/hr, using no controls, and venting to DC-10. This unit heats the refractory of the caster to remove residual moisture prior to the addition of molten metal to the process.**

\*\*\*

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration **R039-14366-00078** is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

\*\*\*

SECTION D.1 **EMISSION UNIT OPERATION CONDITIONS**

Facility Description [326 IAC 2-5.1-2(f)(2)][326 IAC 2-5.5-4(a)(2)]:

\*\*\*

- (h) **One (1) linishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.**

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)][326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the processes listed in the table below shall not exceed the following:

Emission Unit	Process Weight Rate (lbs/hr)	Allowable PM Limit (lbs/hr)
two (2) air melt atomization towers/DC1 and DC3	800, each	2.22, each
cobalt classifying operation/DC4	975	2.53
iron/nickel classifying operation/DC5	975	2.53
<b>Linishing Line</b>	<b>50</b>	<b>0.35</b>

The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per

hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions from the fume hood, the castable rework, and the Rod/Wire Casting fume hood, and the welding powder spray coating booth (Booth A) shall not exceed 0.551 lbs/hr each.

\*\*\*

#### D.1.4 Baghouse Operations

In order to assure compliance with Condition D.1.1(b), the baghouses shall be in operation **and control emissions from the associated processes at all times** when these processes are in operation.

\*\*\*

### Conclusion and Recommendation

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 February 20, 2024.

The construction and operation of this proposed revision shall be subject to the conditions of the attached Registration Revision No. 039-47548-00078. The staff recommends to the Commissioner that the Registration Revision be approved.

### IDEM Contact

- (a) If you have any questions regarding this permit, please contact Sarah Germann, 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) 234-6555 or (800) 451-6027, and ask for Sarah Germann or (317) 234-6555.
- (b) A copy of the findings is available on the Internet at: <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: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.



**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#); [Randy Porter](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Tuesday, April 2, 2024 2:21:30 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

Question on the Technical Document. Pages 3 and 4 in relation to the Linishing line dust collector.

As I read the text clipped below, it implies the facility was operating the linishing line dust collector without a permit since it was installed in 1990, and as such may be subject to enforcement issues (page 4). To be clear, the facility was operating a dust collection system on this unit since it was installed in 1990, but the collection was fully indoors, collecting to an indoor collection drum. To my understanding, this type of configuration does not need a permit (until now as they reroute it to the DC5 baghouse). If I am correct in my understanding of the draft text below, and that the indoors configuration of the dust collection did not need a permit, can the text be revised to be clear on that so that it is not subject to enforcement issues? (unless I'm misunderstanding)

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) linishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

---

Kennametal Stellite LP  
Goshen, Indiana  
Permit Reviewer: Sarah Germann

Page 4 of 10  
TSD for Registration Revision No. 039-47548-00078

<b>Enforcement Issues</b>
---------------------------

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <randy.porter@kennametal.com>; Graves, Matt <Matt.Graves1@aecom.com>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment



**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Tuesday, April 2, 2024 2:57:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

The main issue was that the linishing line unit (installed in 1990), itself, was not included in the permit or in the calculations. It is my understanding that the emissions associated with Baghouse DC12, which is being added to the permit, are from the linishing line. With a PTE for PM of 5.48 ton/yr, the emissions from the linishing line are above the exemption level. Switching control devices from a drum to a baghouse does not change the fact that the linishing line was not in the permit even though it was already constructed and operating.



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <Matt.Graves1@aecom.com>  
**Sent:** Tuesday, April 2, 2024 2:21 PM  
**To:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>; Randy Porter <randy.porter@kennametal.com>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Question on the Technical Document. Pages 3 and 4 in relation to the Linishing line dust collector.

As I read the text clipped below, it implies the facility was operating the linishing line dust collector without a permit since it was installed in 1990, and as such may be subject to enforcement issues (page 4). To be clear, the facility was operating a dust collection system on this unit since it was installed in 1990, but the collection was fully indoors, collecting to an indoor collection drum. To my understanding, this type of configuration does not need a permit (until now as they reroute it to the DC5 baghouse). If I am correct in my understanding of the draft text below, and that the indoors configuration of the dust collection did not need a permit, can the text be revised to be clear on that so that it is not subject to enforcement issues? (unless I'm misunderstanding)

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) finishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

---

Kennametal Stellite LP  
Goshen, Indiana  
Permit Reviewer: Sarah Germann

Page 4 of 10  
TSD for Registration Revision No. 039-47548-00078

<b>Enforcement Issues</b>
---------------------------

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or

phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#); [Randy Porter](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Tuesday, April 2, 2024 3:27:20 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Apologies for back and forth.... But DC12 is not a new baghouse. DC12 was / is a dust collection hood/vacuum that collects the dust at the indoor linishing line. The former / original (pre-permit) configuration had DC12 exhausting into the collection drum (indoors). The requested change is to reroute the final discharge/exhaust point of DC12 from that indoors collection drum to the existing Baghouse DC5.

Maybe a phone call would help me understand / and/or explain. Maybe I'm missing something.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Sent:** Tuesday, April 2, 2024 2:57 PM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>; Randy Porter <randy.porter@kennametal.com>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

The main issue was that the linishing line unit (installed in 1990), itself, was not included in the permit or in the calculations. It is my understanding that the emissions associated with Baghouse DC12, which is being added to the permit, are from the linishing line. With a PTE for PM of 5.48 ton/yr, the emissions from the linishing line are above the exemption level. Switching control devices from a drum to a baghouse does not change the fact that the linishing line was not in the permit even though it was already constructed and operating.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, April 2, 2024 2:21 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Question on the Technical Document. Pages 3 and 4 in relation to the Linishing line dust collector.

As I read the text clipped below, it implies the facility was operating the linishing line dust collector without a permit since it was installed in 1990, and as such may be subject to enforcement issues (page 4). To be clear, the facility was operating a dust collection system on this unit since it was installed in 1990, but the collection was fully indoors, collecting to an indoor collection drum. To my understanding, this type of configuration does not need a permit (until now as they reroute it to the DC5 baghouse). If I am correct in my understanding of the draft text below, and that the indoors configuration of the dust collection did not need a permit, can the text be revised to be clear on that so that it is not subject to enforcement issues? (unless I'm misunderstanding)

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) linishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

<b>Enforcement Issues</b>
---------------------------

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.



Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann

Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)



---

Protecting Hoosiers and Our Environment

---

**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#); [Randy Porter](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Wednesday, April 3, 2024 8:31:34 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

Good morning. I just wanted to add another detail that I just learned from Kennametal regarding the Linisher as follows:

“the linisher was made in 1990 but was not at our plant until we put in the rod line. Which was like 2012 I believe from the other things we talked about.”

I’m available today to discuss this and my question/comment below at your convenience.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Graves, Matt  
**Sent:** Tuesday, April 2, 2024 3:27 PM  
**To:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>; Randy Porter <randy.porter@kennametal.com>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Sarah,

Apologies for back and forth.... But DC12 is not a new baghouse. DC12 was / is a dust collection hood/vacuum that collects the dust at the indoor linishing line. The former / original (pre-permit) configuration had DC12 exhausting into the collection drum (indoors). The requested change is to reroute the final discharge/exhaust point of DC12 from that indoors collection drum to the existing Baghouse DC5.

Maybe a phone call would help me understand / and/or explain. Maybe I’m missing something.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Tuesday, April 2, 2024 2:57 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

The main issue was that the linishing line unit (installed in 1990), itself, was not included in the permit or in the calculations. It is my understanding that the emissions associated with Baghouse DC12, which is being added to the permit, are from the linishing line. With a PTE for PM of 5.48 ton/yr, the emissions from the linishing line are above the exemption level. Switching control devices from a drum to a baghouse does not change the fact that the linishing line was not in the permit even though it was already constructed and operating.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, April 2, 2024 2:21 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Question on the Technical Document. Pages 3 and 4 in relation to the Linishing line dust collector.

As I read the text clipped below, it implies the facility was operating the linishing line dust collector without a permit since it was installed in 1990, and as such may be subject to enforcement issues (page 4). To be clear, the facility was operating a dust collection system on this unit since it was installed in 1990, but the collection was fully indoors, collecting to an indoor collection drum. To my

understanding, this type of configuration does not need a permit (until now as they reroute it to the DC5 baghouse). If I am correct in my understanding of the draft text below, and that the indoors configuration of the dust collection did not need a permit, can the text be revised to be clear on that so that it is not subject to enforcement issues? (unless I'm misunderstanding)

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) finishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

---

---

Kennametal Stellite LP  
Goshen, Indiana  
Permit Reviewer: Sarah Germann

Page 4 of 10  
TSD for Registration Revision No. 039-47548-00078

<b>Enforcement Issues</b>
---------------------------

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Wednesday, April 3, 2024 12:42:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hi Matt,

We can add the detail that the linishing line was not in operation until 2012. The linishing line is the emission source, and it was not included in the permit previously, even though it has been constructed and operating. If there was an emission unit that was not in the permit but was operating at the source, it needs to be added to the permit. This unit is not exempt because the PM emissions are above 5ton/yr. The baghouse does not change whether the unit was permitted before it was operating. All PTE is before control.

Thanks,  
Sarah



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <Matt.Graves1@aecom.com>  
**Sent:** Wednesday, April 3, 2024 8:31 AM  
**To:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>; Randy Porter <randy.porter@kennametal.com>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Good morning. I just wanted to add another detail that I just learned from Kennametal regarding the Linisher as follows:

“the linisher was made in 1990 but was not at our plant until we put in the rod line. Which was like

2012 I believe from the other things we talked about.”

I’m available today to discuss this and my question/comment below at your convenience.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Graves, Matt

**Sent:** Tuesday, April 2, 2024 3:27 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter  
<[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal  
Stellite, LP

Sarah,

Apologies for back and forth.... But DC12 is not a new baghouse. DC12 was / is a dust collection hood/vacuum that collects the dust at the indoor linishing line. The former / original (pre-permit) configuration had DC12 exhausting into the collection drum (indoors). The requested change is to reroute the final discharge/exhaust point of DC12 from that indoors collection drum to the existing Baghouse DC5.

Maybe a phone call would help me understand / and/or explain. Maybe I’m missing something.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Tuesday, April 2, 2024 2:57 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal  
Stellite, LP

The main issue was that the linishing line unit (installed in 1990), itself, was not included in the permit or in the calculations. It is my understanding that the emissions associated with Baghouse DC12, which is being added to the permit, are from the linishing line. With a PTE for PM of 5.48 ton/yr, the emissions from the linishing line are above the exemption level.



Switching control devices from a drum to a baghouse does not change the fact that the linishing line was not in the permit even though it was already constructed and operating.



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, April 2, 2024 2:21 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Question on the Technical Document. Pages 3 and 4 in relation to the Linishing line dust collector.

As I read the text clipped below, it implies the facility was operating the linishing line dust collector without a permit since it was installed in 1990, and as such may be subject to enforcement issues (page 4). To be clear, the facility was operating a dust collection system on this unit since it was installed in 1990, but the collection was fully indoors, collecting to an indoor collection drum. To my understanding, this type of configuration does not need a permit (until now as they reroute it to the DC5 baghouse). If I am correct in my understanding of the draft text below, and that the indoors configuration of the dust collection did not need a permit, can the text be revised to be clear on that so that it is not subject to enforcement issues? (unless I'm misunderstanding)

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) finishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr. controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

---

Kennametal Stellite LP  
Goshen, Indiana  
Permit Reviewer: Sarah Germann

Page 4 of 10  
TSD for Registration Revision No. 039-47548-00078

<b>Enforcement Issues</b>
---------------------------

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for

issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#); [Randy Porter](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Wednesday, April 3, 2024 12:46:56 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Understood. Thank you for the additional clarification. Could you revise the draft permit with the 2012 reference below for our review? There's a big difference between 1990 and 2012 as an installation date.

Thanks again!!

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Sent:** Wednesday, April 3, 2024 12:43 PM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>; Randy Porter <randy.porter@kennametal.com>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hi Matt,

We can add the detail that the finishing line was not in operation until 2012. The finishing line is the emission source, and it was not included in the permit previously, even though it has been constructed and operating. If there was an emission unit that was not in the permit but was operating at the source, it needs to be added to the permit. This unit is not exempt because the PM emissions are above 5ton/yr. The baghouse does not change whether the unit was permitted before it was operating. All PTE is before control.

Thanks,  
Sarah

---

Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager



• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 8:31 AM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Good morning. I just wanted to add another detail that I just learned from Kennametal regarding the Linisher as follows:

“the linisher was made in 1990 but was not at our plant until we put in the rod line. Which was like 2012 I believe from the other things we talked about.”

I’m available today to discuss this and my question/comment below at your convenience.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Graves, Matt  
**Sent:** Tuesday, April 2, 2024 3:27 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Sarah,

Apologies for back and forth.... But DC12 is not a new baghouse. DC12 was / is a dust collection hood/vacuum that collects the dust at the indoor linishing line. The former / original (pre-permit) configuration had DC12 exhausting into the collection drum (indoors). The requested change is to reroute the final discharge/exhaust point of DC12 from that indoors collection drum to the existing Baghouse DC5.

Maybe a phone call would help me understand / and/or explain. Maybe I'm missing something.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Tuesday, April 2, 2024 2:57 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

The main issue was that the linishing line unit (installed in 1990), itself, was not included in the permit or in the calculations. It is my understanding that the emissions associated with Baghouse DC12, which is being added to the permit, are from the linishing line. With a PTE for PM of 5.48 ton/yr, the emissions from the linishing line are above the exemption level. Switching control devices from a drum to a baghouse does not change the fact that the linishing line was not in the permit even though it was already constructed and operating.



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Sent:** Tuesday, April 2, 2024 2:21 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal

Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

Question on the Technical Document. Pages 3 and 4 in relation to the Linishing line dust collector.

As I read the text clipped below, it implies the facility was operating the linishing line dust collector without a permit since it was installed in 1990, and as such may be subject to enforcement issues (page 4). To be clear, the facility was operating a dust collection system on this unit since it was installed in 1990, but the collection was fully indoors, collecting to an indoor collection drum. To my understanding, this type of configuration does not need a permit (until now as they reroute it to the DC5 baghouse). If I am correct in my understanding of the draft text below, and that the indoors configuration of the dust collection did not need a permit, can the text be revised to be clear on that so that it is not subject to enforcement issues? (unless I'm misunderstanding)

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) linishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

---

Kennametal Stellite LP  
Goshen, Indiana  
Permit Reviewer: Sarah Germann

Page 4 of 10  
TSD for Registration Revision No. 039-47548-00078

<b>Enforcement Issues</b>
---------------------------

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591

[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---



**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Wednesday, April 3, 2024 12:56:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

I will change it to say, “constructed in 2012.” Other than that, do you have any comments from applicant review? Or may I move forward with issuing the permit?



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 12:47 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Understood. Thank you for the additional clarification. Could you revise the draft permit with the 2012 reference below for our review? There's a big difference between 1990 and 2012 as an installation date.

Thanks again!!

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Wednesday, April 3, 2024 12:43 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hi Matt,

We can add the detail that the linishing line was not in operation until 2012. The linishing line is the emission source, and it was not included in the permit previously, even though it has been constructed and operating. If there was an emission unit that was not in the permit but was operating at the source, it needs to be added to the permit. This unit is not exempt because the PM emissions are above 5ton/yr. The baghouse does not change whether the unit was permitted before it was operating. All PTE is before control.

Thanks,  
Sarah



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Sent:** Wednesday, April 3, 2024 8:31 AM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Good morning. I just wanted to add another detail that I just learned from Kennametal regarding the Linisher as follows:

“the linisher was made in 1990 but was not at our plant until we put in the rod line. Which was like 2012 I believe from the other things we talked about.”

I'm available today to discuss this and my question/comment below at your convenience.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Graves, Matt

**Sent:** Tuesday, April 2, 2024 3:27 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Sarah,

Apologies for back and forth.... But DC12 is not a new baghouse. DC12 was / is a dust collection hood/vacuum that collects the dust at the indoor finishing line. The former / original (pre-permit) configuration had DC12 exhausting into the collection drum (indoors). The requested change is to reroute the final discharge/exhaust point of DC12 from that indoors collection drum to the existing Baghouse DC5.

Maybe a phone call would help me understand / and/or explain. Maybe I'm missing something.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Tuesday, April 2, 2024 2:57 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

The main issue was that the finishing line unit (installed in 1990), itself, was not included in the permit or in the calculations. It is my understanding that the emissions associated with Baghouse DC12, which is being added to the permit, are from the finishing line. With a PTE for PM of 5.48 ton/yr, the emissions from the finishing line are above the exemption level. Switching control devices from a drum to a baghouse does not change the fact that the

linishing line was not in the permit even though it was already constructed and operating.



Indiana Department of  
Environmental Management

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Sent:** Tuesday, April 2, 2024 2:21 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter  
<[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal  
Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Question on the Technical Document. Pages 3 and 4 in relation to the Linishing line dust collector.

As I read the text clipped below, it implies the facility was operating the linishing line dust collector without a permit since it was installed in 1990, and as such may be subject to enforcement issues (page 4). To be clear, the facility was operating a dust collection system on this unit since it was installed in 1990, but the collection was fully indoors, collecting to an indoor collection drum. To my understanding, this type of configuration does not need a permit (until now as they reroute it to the DC5 baghouse). If I am correct in my understanding of the draft text below, and that the indoors configuration of the dust collection did not need a permit, can the text be revised to be clear on that so that it is not subject to enforcement issues? (unless I'm misunderstanding)

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) finishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr. controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

---

Kennametal Stellite LP  
Goshen, Indiana  
Permit Reviewer: Sarah Germann

Page 4 of 10  
TSD for Registration Revision No. 039-47548-00078

<b>Enforcement Issues</b>
---------------------------

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for

issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Wednesday, April 3, 2024 12:59:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Yes, sounds good!



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 12:59 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Let me double check with Kennametal and get back to you tomorrow. Good ??

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 3, 2024 12:57 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

I will change it to say, “constructed in 2012.” Other than that, do you have any comments from

applicant review? Or may I move forwards with issuing the permit?



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 12:47 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Understood. Thank you for the additional clarification. Could you revise the draft permit with the 2012 reference below for our review? There's a big difference between 1990 and 2012 as an installation date.

Thanks again!!

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 3, 2024 12:43 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hi Matt,



We can add the detail that the linishing line was not in operation until 2012. The linishing line is the emission source, and it was not included in the permit previously, even though it has been constructed and operating. If there was an emission unit that was not in the permit but was operating at the source, it needs to be added to the permit. This unit is not exempt because the PM emissions are above 5ton/yr. The baghouse does not change whether the unit was permitted before it was operating. All PTE is before control.

Thanks,  
Sarah



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 8:31 AM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Good morning. I just wanted to add another detail that I just learned from Kennametal regarding the Linisher as follows:

“the linisher was made in 1990 but was not at our plant until we put in the rod line. Which was like 2012 I believe from the other things we talked about.”

I’m available today to discuss this and my question/comment below at your convenience.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Graves, Matt

**Sent:** Tuesday, April 2, 2024 3:27 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Sarah,

Apologies for back and forth.... But DC12 is not a new baghouse. DC12 was / is a dust collection hood/vacuum that collects the dust at the indoor linishing line. The former / original (pre-permit) configuration had DC12 exhausting into the collection drum (indoors). The requested change is to reroute the final discharge/exhaust point of DC12 from that indoors collection drum to the existing Baghouse DC5.

Maybe a phone call would help me understand / and/or explain. Maybe I'm missing something.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Tuesday, April 2, 2024 2:57 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

The main issue was that the linishing line unit (installed in 1990), itself, was not included in the permit or in the calculations. It is my understanding that the emissions associated with Baghouse DC12, which is being added to the permit, are from the linishing line. With a PTE for PM of 5.48 ton/yr, the emissions from the linishing line are above the exemption level. Switching control devices from a drum to a baghouse does not change the fact that the linishing line was not in the permit even though it was already constructed and operating.

Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)



---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, April 2, 2024 2:21 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Question on the Technical Document. Pages 3 and 4 in relation to the Linishing line dust collector.

As I read the text clipped below, it implies the facility was operating the linishing line dust collector without a permit since it was installed in 1990, and as such may be subject to enforcement issues (page 4). To be clear, the facility was operating a dust collection system on this unit since it was installed in 1990, but the collection was fully indoors, collecting to an indoor collection drum. To my understanding, this type of configuration does not need a permit (until now as they reroute it to the DC5 baghouse). If I am correct in my understanding of the draft text below, and that the indoors configuration of the dust collection did not need a permit, can the text be revised to be clear on that so that it is not subject to enforcement issues? (unless I'm misunderstanding)

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) finishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr. controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

---

Kennametal Stellite LP  
Goshen, Indiana  
Permit Reviewer: Sarah Germann

Page 4 of 10  
TSD for Registration Revision No. 039-47548-00078

<b>Enforcement Issues</b>
---------------------------

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for

issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#); [Randy Porter](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Wednesday, April 3, 2024 12:59:20 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Let me double check with Kennametal and get back to you tomorrow. Good ??

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 3, 2024 12:57 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

I will change it to say, “constructed in 2012.” Other than that, do you have any comments from applicant review? Or may I move forward with issuing the permit?



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 12:47 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Understood. Thank you for the additional clarification. Could you revise the draft permit with the 2012 reference below for our review? There's a big difference between 1990 and 2012 as an installation date.

Thanks again!!

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Wednesday, April 3, 2024 12:43 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hi Matt,

We can add the detail that the finishing line was not in operation until 2012. The finishing line is the emission source, and it was not included in the permit previously, even though it has been constructed and operating. If there was an emission unit that was not in the permit but was operating at the source, it needs to be added to the permit. This unit is not exempt because the PM emissions are above 5ton/yr. The baghouse does not change whether the unit was permitted before it was operating. All PTE is before control.

Thanks,  
Sarah



---

Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 8:31 AM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Good morning. I just wanted to add another detail that I just learned from Kennametal regarding the Linisher as follows:

“the linisher was made in 1990 but was not at our plant until we put in the rod line. Which was like 2012 I believe from the other things we talked about.”

I’m available today to discuss this and my question/comment below at your convenience.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Graves, Matt  
**Sent:** Tuesday, April 2, 2024 3:27 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Sarah,

Apologies for back and forth.... But DC12 is not a new baghouse. DC12 was / is a dust collection hood/vacuum that collects the dust at the indoor linishing line. The former / original (pre-permit) configuration had DC12 exhausting into the collection drum (indoors). The requested change is to reroute the final discharge/exhaust point of DC12 from that indoors collection drum to the existing Baghouse DC5.



Maybe a phone call would help me understand / and/or explain. Maybe I'm missing something.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Tuesday, April 2, 2024 2:57 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

The main issue was that the linishing line unit (installed in 1990), itself, was not included in the permit or in the calculations. It is my understanding that the emissions associated with Baghouse DC12, which is being added to the permit, are from the linishing line. With a PTE for PM of 5.48 ton/yr, the emissions from the linishing line are above the exemption level. Switching control devices from a drum to a baghouse does not change the fact that the linishing line was not in the permit even though it was already constructed and operating.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, April 2, 2024 2:21 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Question on the Technical Document. Pages 3 and 4 in relation to the Linishing line dust collector.

As I read the text clipped below, it implies the facility was operating the finishing line dust collector without a permit since it was installed in 1990, and as such may be subject to enforcement issues (page 4). To be clear, the facility was operating a dust collection system on this unit since it was installed in 1990, but the collection was fully indoors, collecting to an indoor collection drum. To my understanding, this type of configuration does not need a permit (until now as they reroute it to the DC5 baghouse). If I am correct in my understanding of the draft text below, and that the indoors configuration of the dust collection did not need a permit, can the text be revised to be clear on that so that it is not subject to enforcement issues? (unless I'm misunderstanding)

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) finishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

---

---

Kennametal Stellite LP  
Goshen, Indiana  
Permit Reviewer: Sarah Germann

Page 4 of 10  
TSD for Registration Revision No. 039-47548-00078

<b>Enforcement Issues</b>
---------------------------

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#); [Randy Porter](#)  
**Cc:** [Chevalier, Laura](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Friday, April 5, 2024 2:04:58 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

My apologies for the delay in getting back to you. We are still having internal discussions with Kennametal and expect to be able to provide you an answer Monday which I believe was the deadline to notify you if we had concerns/comments or edit requests. We will definitely get back to you by then if not sooner.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 3, 2024 1:00 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Yes, sounds good!



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 12:59 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Let me double check with Kennametal and get back to you tomorrow. Good ??

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 3, 2024 12:57 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

I will change it to say, “constructed in 2012.” Other than that, do you have any comments from applicant review? Or may I move forward with issuing the permit?



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 12:47 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal

Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Understood. Thank you for the additional clarification. Could you revise the draft permit with the 2012 reference below for our review? There's a big difference between 1990 and 2012 as an installation date.

Thanks again!!

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 3, 2024 12:43 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hi Matt,

We can add the detail that the finishing line was not in operation until 2012. The finishing line is the emission source, and it was not included in the permit previously, even though it has been constructed and operating. If there was an emission unit that was not in the permit but was operating at the source, it needs to be added to the permit. This unit is not exempt because the PM emissions are above 5ton/yr. The baghouse does not change whether the unit was permitted before it was operating. All PTE is before control.

Thanks,  
Sarah



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 8:31 AM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

Good morning. I just wanted to add another detail that I just learned from Kennametal regarding the Linisher as follows:

“the linisher was made in 1990 but was not at our plant until we put in the rod line. Which was like 2012 I believe from the other things we talked about.”

I’m available today to discuss this and my question/comment below at your convenience.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Graves, Matt  
**Sent:** Tuesday, April 2, 2024 3:27 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Sarah,

Apologies for back and forth.... But DC12 is not a new baghouse. DC12 was / is a dust collection hood/vacuum that collects the dust at the indoor linishing line. The former / original (pre-permit) configuration had DC12 exhausting into the collection drum (indoors). The requested change is to reroute the final discharge/exhaust point of DC12 from that indoors collection drum to the existing

Baghouse DC5.

Maybe a phone call would help me understand / and/or explain. Maybe I'm missing something.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Tuesday, April 2, 2024 2:57 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

The main issue was that the finishing line unit (installed in 1990), itself, was not included in the permit or in the calculations. It is my understanding that the emissions associated with Baghouse DC12, which is being added to the permit, are from the finishing line. With a PTE for PM of 5.48 ton/yr, the emissions from the finishing line are above the exemption level. Switching control devices from a drum to a baghouse does not change the fact that the finishing line was not in the permit even though it was already constructed and operating.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, April 2, 2024 2:21 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,



Question on the Technical Document. Pages 3 and 4 in relation to the Linishing line dust collector.

As I read the text clipped below, it implies the facility was operating the linishing line dust collector without a permit since it was installed in 1990, and as such may be subject to enforcement issues (page 4). To be clear, the facility was operating a dust collection system on this unit since it was installed in 1990, but the collection was fully indoors, collecting to an indoor collection drum. To my understanding, this type of configuration does not need a permit (until now as they reroute it to the DC5 baghouse). If I am correct in my understanding of the draft text below, and that the indoors configuration of the dust collection did not need a permit, can the text be revised to be clear on that so that it is not subject to enforcement issues? (unless I'm misunderstanding)

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) linishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

---

Kennametal Stellite LP  
Goshen, Indiana  
Permit Reviewer: Sarah Germann

Page 4 of 10  
TSD for Registration Revision No. 039-47548-00078

<b>Enforcement Issues</b>
---------------------------

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Thanks,

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Cc:** [Chevalier, Laura](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Friday, April 5, 2024 2:17:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Sounds good, thank you



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <Matt.Graves1@aecom.com>  
**Sent:** Friday, April 5, 2024 2:05 PM  
**To:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Chevalier, Laura <laura.chevalier@aecom.com>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

My apologies for the delay in getting back to you. We are still having internal discussions with Kennametal and expect to be able to provide you an answer Monday which I believe was the deadline to notify you if we had concerns/comments or edit requests. We will definitely get back to you by then if not sooner.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 3, 2024 1:00 PM  
**To:** Graves, Matt <[Matt.Graeves1@aecom.com](mailto:Matt.Graeves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Yes, sounds good!



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graeves1@aecom.com](mailto:Matt.Graeves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 12:59 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Let me double check with Kennametal and get back to you tomorrow. Good ??

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 3, 2024 12:57 PM  
**To:** Graves, Matt <[Matt.Graeves1@aecom.com](mailto:Matt.Graeves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

I will change it to say, “constructed in 2012.” Other than that, do you have any comments from applicant review? Or may I move forward with issuing the permit?



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 12:47 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Understood. Thank you for the additional clarification. Could you revise the draft permit with the 2012 reference below for our review? There's a big difference between 1990 and 2012 as an installation date.

Thanks again!!

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 3, 2024 12:43 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hi Matt,

We can add the detail that the linishing line was not in operation until 2012. The linishing line is the emission source, and it was not included in the permit previously, even though it has been constructed and operating. If there was an emission unit that was not in the permit but was operating at the source, it needs to be added to the permit. This unit is not exempt because the PM emissions are above 5ton/yr. The baghouse does not change whether the unit was permitted before it was operating. All PTE is before control.

Thanks,  
Sarah



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 3, 2024 8:31 AM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

Good morning. I just wanted to add another detail that I just learned from Kennametal regarding the Linisher as follows:

“the linisher was made in 1990 but was not at our plant until we put in the rod line. Which was like 2012 I believe from the other things we talked about.”

I’m available today to discuss this and my question/comment below at your convenience.

Thanks,

matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Graves, Matt

**Sent:** Tuesday, April 2, 2024 3:27 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Sarah,

Apologies for back and forth.... But DC12 is not a new baghouse. DC12 was / is a dust collection hood/vacuum that collects the dust at the indoor linishing line. The former / original (pre-permit) configuration had DC12 exhausting into the collection drum (indoors). The requested change is to reroute the final discharge/exhaust point of DC12 from that indoors collection drum to the existing Baghouse DC5.

Maybe a phone call would help me understand / and/or explain. Maybe I'm missing something.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Tuesday, April 2, 2024 2:57 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

The main issue was that the linishing line unit (installed in 1990), itself, was not included in the permit or in the calculations. It is my understanding that the emissions associated with Baghouse DC12, which is being added to the permit, are from the linishing line. With a PTE for PM of 5.48 ton/yr, the emissions from the linishing line are above the exemption level. Switching control devices from a drum to a baghouse does not change the fact that the linishing line was not in the permit even though it was already constructed and operating.

---

Indiana Department of  
Environmental Management  
Sarah Germann



Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, April 2, 2024 2:21 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Question on the Technical Document. Pages 3 and 4 in relation to the Linishing line dust collector.

As I read the text clipped below, it implies the facility was operating the linishing line dust collector without a permit since it was installed in 1990, and as such may be subject to enforcement issues (page 4). To be clear, the facility was operating a dust collection system on this unit since it was installed in 1990, but the collection was fully indoors, collecting to an indoor collection drum. To my understanding, this type of configuration does not need a permit (until now as they reroute it to the DC5 baghouse). If I am correct in my understanding of the draft text below, and that the indoors configuration of the dust collection did not need a permit, can the text be revised to be clear on that so that it is not subject to enforcement issues? (unless I'm misunderstanding)



The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) finishing equipment line, constructed in 1990 and permitted in 2024, with a maximum throughput of 50 lb/hr. controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

---

Kennametal Stellite LP  
Goshen, Indiana  
Permit Reviewer: Sarah Germann

Page 4 of 10  
TSD for Registration Revision No. 039-47548-00078

<b>Enforcement Issues</b>
---------------------------

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for

issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Friday, April 5, 2024 5:34:41 PM  
**Attachments:** [image001.png](#)

---

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <randy.porter@kennametal.com>; Graves, Matt <Matt.Graves1@aecom.com>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management  
\_\_\_\_\_  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

\_\_\_\_\_  
Protecting Hoosiers and Our Environment

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Monday, April 8, 2024 9:17:00 AM  
**Attachments:** [image001.png](#)

---

Thank you for the message. I will leave the clock stopped on Applicant Review until I hear from you.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <Matt.Graves1@aecom.com>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Wednesday, April 10, 2024 2:19:00 PM  
**Attachments:** [image001.png](#)

---

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <Matt.Graves1@aecom.com>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---





**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Wednesday, April 10, 2024 2:33:14 PM  
**Attachments:** [image001.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

We certainly appreciate your interest in getting this resolved sooner than later. However, considering the questions that came up regarding the Linishing line and the baghouse, the site is taking a closer look within their operations to see if there is anything else that may be similar in nature needing to be included in the permit. Unfortunately, their lead engineer is out this week and can't contribute to the evaluation. He will be back next week and depending on what comes of that review, we may be drafting another request for inclusion in this amendment. The site wants to be as thorough as possible to evaluate all qualifying processes and/or equipment. Accordingly, we are asking that the clock continue to be paused to allow for this review. We will have our response ready upon your return.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Sent:** Wednesday, April 10, 2024 2:20 PM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.

---

Indiana Department of  
Environmental Management  
Sarah Germann



Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance

of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Wednesday, April 10, 2024 3:16:00 PM  
**Attachments:** [image001.png](#)

---

All right, thanks



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <Matt.Graves1@aecom.com>  
**Sent:** Wednesday, April 10, 2024 2:33 PM  
**To:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

We certainly appreciate your interest in getting this resolved sooner than later. However, considering the questions that came up regarding the Linishing line and the baghouse, the site is taking a closer look within their operations to see if there is anything else that may be similar in nature needing to be included in the permit. Unfortunately, their lead engineer is out this week and can't contribute to the evaluation. He will be back next week and depending on what comes of that review, we may be drafting another request for inclusion in this amendment. The site wants to be as thorough as possible to evaluate all qualifying processes and/or equipment. Accordingly, we are asking that the clock continue to be paused to allow for this review. We will have our response ready upon your return.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-

00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann

Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)



---

Protecting Hoosiers and Our Environment

---



**From:** [Graves, Matt](#)  
**To:** [Germann, Sarah R \(IDEM\)](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#); [Hartley, Heath](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Tuesday, May 7, 2024 4:55:03 PM  
**Attachments:** [image001.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

The AECOM team has been working with the Kennametal team to review additional information regarding the recently submitted amendment application for their Registration. We understand that you desire to move forward on the application, but Kennametal and AECOM will not complete our collective review by tomorrow as requested. We instead ask that IDEM continue to pause processing on the application.

If you have any questions or concerns, please feel free to contact me.

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Sent:** Wednesday, April 10, 2024 3:17 PM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

All right, thanks



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 10, 2024 2:33 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

We certainly appreciate your interest in getting this resolved sooner than later. However, considering the questions that came up regarding the Linishing line and the baghouse, the site is taking a closer look within their operations to see if there is anything else that may be similar in nature needing to be included in the permit. Unfortunately, their lead engineer is out this week and can't contribute to the evaluation. He will be back next week and depending on what comes of that review, we may be drafting another request for inclusion in this amendment. The site wants to be as thorough as possible to evaluate all qualifying processes and/or equipment. Accordingly, we are asking that the clock continue to be paused to allow for this review. We will have our response ready upon your return.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graeves1@aecom.com](mailto:Matt.Graeves1@aecom.com)>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graeves1@aecom.com](mailto:Matt.Graeves1@aecom.com)>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#); [Hartley, Heath](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Wednesday, May 15, 2024 2:20:00 PM  
**Attachments:** [image001.png](#)

---

Hello Matt,

Has there been any progress on the discussion about Kennametal's permit? I have made the changes to the emission unit description for the finishing line requested from applicant review on April 3<sup>rd</sup>. Since then, I have not received further comments.

The Registration Revision has been on applicant review since April 1<sup>st</sup>. Ordinarily for a permit of this level there is a one-week applicant review timeframe. If there are no additional comments, I would like to move forward with this Revision. As a reminder, there is not a limit on the number of Administrative Amendments or Revisions a source can apply for within a year. Additional units may be added to the source via another application if necessary.

Thank you,  
Sarah



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <Matt.Graves1@aecom.com>  
**Sent:** Tuesday, May 7, 2024 4:55 PM  
**To:** Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>; Hartley, Heath <HHartley@idem.IN.gov>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

The AECOM team has been working with the Kennametal team to review additional information regarding the recently submitted amendment application for their Registration. We understand that you desire to move forward on the application, but Kennametal and AECOM will not complete our collective review by tomorrow as requested. We instead ask that IDEM continue to pause processing on the application.

If you have any questions or concerns, please feel free to contact me.

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 3:17 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

All right, thanks



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 10, 2024 2:33 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or

click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

We certainly appreciate your interest in getting this resolved sooner than later. However, considering the questions that came up regarding the Linishing line and the baghouse, the site is taking a closer look within their operations to see if there is anything else that may be similar in nature needing to be included in the permit. Unfortunately, their lead engineer is out this week and can't contribute to the evaluation. He will be back next week and depending on what comes of that review, we may be drafting another request for inclusion in this amendment. The site wants to be as thorough as possible to evaluate all qualifying processes and/or equipment. Accordingly, we are asking that the clock continue to be paused to allow for this review. We will have our response ready upon your return.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.



During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

---

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#); [Hartley, Heath](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Thursday, May 23, 2024 11:15:00 AM  
**Attachments:** [image001.png](#)

---

Hello Matt,

I am emailing to follow up a voicemail I just sent about Kennametal. Do you have any updates for this permit which is still on applicant review? Have you discussed moving forward with this permit, and the option of submitting a new application for any additional emission units, with the source?

Thanks,  
Sarah



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Wednesday, May 15, 2024 2:20 PM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>; Hartley, Heath <HHartley@idem.IN.gov>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

Has there been any progress on the discussion about Kennametal's permit? I have made the changes to the emission unit description for the finishing line requested from applicant review on April 3<sup>rd</sup>. Since then, I have not received further comments.

The Registration Revision has been on applicant review since April 1<sup>st</sup>. Ordinarily for a permit of this level there is a one-week applicant review timeframe. If there are no additional comments, I would like to move forward with this Revision. As a reminder, there is not a limit on the number of Administrative Amendments or Revisions a source can apply for within a year. Additional units may be added to the source via another application if necessary.

Thank you,  
Sarah



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, May 7, 2024 4:55 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

The AECOM team has been working with the Kennametal team to review additional information regarding the recently submitted amendment application for their Registration. We understand that you desire to move forward on the application, but Kennametal and AECOM will not complete our collective review by tomorrow as requested. We instead ask that IDEM continue to pause processing on the application.

If you have any questions or concerns, please feel free to contact me.

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Wednesday, April 10, 2024 3:17 PM

**To:** Graves, Matt <[Matt.Graeves1@aecom.com](mailto:Matt.Graeves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

All right, thanks



Indiana Department of  
Environmental Management

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graeves1@aecom.com](mailto:Matt.Graeves1@aecom.com)>

**Sent:** Wednesday, April 10, 2024 2:33 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

Sarah,

We certainly appreciate your interest in getting this resolved sooner than later. However, considering the questions that came up regarding the Linishing line and the baghouse, the site is taking a closer look within their operations to see if there is anything else that may be similar in nature needing to be included in the permit. Unfortunately, their lead engineer is out this week and can't contribute to the evaluation. He will be back next week and depending on what comes of that review, we may be drafting another request for inclusion in this amendment. The site wants to be as thorough as possible to evaluate all qualifying processes and/or equipment. Accordingly, we are asking that the clock continue to be paused to allow for this review. We will have our response ready upon your return.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We

understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann

Indiana Department of  
Environmental Management  

---

Sarah Germann



Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#); [Hartley, Heath](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Thursday, May 30, 2024 1:13:00 PM  
**Attachments:** [image001.png](#)

---

Good Afternoon, Matt,

I am emailing to follow-up this afternoon's voicemail. I tried contacting you last Thursday about the Registration Revision for Kennametal, and I have not since heard an update. Have you been able to speak with the source about this permit, and about the possibility of sending another application with the new units they might be adding? As of today, this permit has been on applicant review for two months, and registrations are typically only on applicant review for a week. I would appreciate an update.

Thank you,  
Sarah



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Thursday, May 23, 2024 11:16 AM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>; Hartley, Heath <HHartley@idem.IN.gov>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

I am emailing to follow up a voicemail I just sent about Kennametal. Do you have any updates for this permit which is still on applicant review? Have you discussed moving forward with this permit, and the option of submitting a new application for any additional emission units, with the source?

Thanks,



Sarah



Indiana Department of  
Environmental Management

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Germann, Sarah R (IDEM)

**Sent:** Wednesday, May 15, 2024 2:20 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

Has there been any progress on the discussion about Kennametal's permit? I have made the changes to the emission unit description for the finishing line requested from applicant review on April 3<sup>rd</sup>. Since then, I have not received further comments.

The Registration Revision has been on applicant review since April 1<sup>st</sup>. Ordinarily for a permit of this level there is a one-week applicant review timeframe. If there are no additional comments, I would like to move forward with this Revision. As a reminder, there is not a limit on the number of Administrative Amendments or Revisions a source can apply for within a year. Additional units may be added to the source via another application if necessary.

Thank you,  
Sarah



Indiana Department of  
Environmental Management

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, May 7, 2024 4:55 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

The AECOM team has been working with the Kennametal team to review additional information regarding the recently submitted amendment application for their Registration. We understand that you desire to move forward on the application, but Kennametal and AECOM will not complete our collective review by tomorrow as requested. We instead ask that IDEM continue to pause processing on the application.

If you have any questions or concerns, please feel free to contact me.

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 3:17 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

All right, thanks

---

Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment



---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 10, 2024 2:33 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

We certainly appreciate your interest in getting this resolved sooner than later. However, considering the questions that came up regarding the Linishing line and the baghouse, the site is taking a closer look within their operations to see if there is anything else that may be similar in nature needing to be included in the permit. Unfortunately, their lead engineer is out this week and can't contribute to the evaluation. He will be back next week and depending on what comes of that review, we may be drafting another request for inclusion in this amendment. The site wants to be as thorough as possible to evaluate all qualifying processes and/or equipment. Accordingly, we are asking that the clock continue to be paused to allow for this review. We will have our response ready upon your return.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Sent:** Friday, April 5, 2024 5:34 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591

[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Hartley, Heath](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#); [Germann, Sarah R \(IDEM\)](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Thursday, May 30, 2024 1:51:15 PM  
**Attachments:** [image003.png](#)  
[image004.png](#)

---

Since we have not received any further comments, we will issue the Registration Revision 47548. If/when you have additional units or changes needed, please submit a new permit application.

Let me know if you have any questions.



Heath Hartley  
Section Chief  
Office of Air Quality, Permits Branch  
Indiana Department of Environmental Management

(317) 232-8217 • [hhartley@idem.IN.gov](mailto:hhartley@idem.IN.gov)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Thursday, May 30, 2024 1:14 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Good Afternoon, Matt,

I am emailing to follow-up this afternoon's voicemail. I tried contacting you last Thursday about the Registration Revision for Kennametal, and I have not since heard an update. Have you been able to speak with the source about this permit, and about the possibility of sending another application with the new units they might be adding? As of today, this permit has been on applicant review for two months, and registrations are typically only on applicant review for a week. I would appreciate an update.

Thank you,  
Sarah

Indiana Department of  
Environmental Management  

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)



---

Protecting Hoosiers and Our Environment

---

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Thursday, May 23, 2024 11:16 AM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

I am emailing to follow up a voicemail I just sent about Kennametal. Do you have any updates for this permit which is still on applicant review? Have you discussed moving forward with this permit, and the option of submitting a new application for any additional emission units, with the source?

Thanks,  
Sarah



---

Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Wednesday, May 15, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

Has there been any progress on the discussion about Kennametal's permit? I have made the changes to the emission unit description for the finishing line requested from applicant review on April 3<sup>rd</sup>. Since then, I have not received further comments.

The Registration Revision has been on applicant review since April 1<sup>st</sup>. Ordinarily for a permit of this level there is a one-week applicant review timeframe. If there are no additional comments, I would like to move forward with this Revision. As a reminder, there is not a limit on the number of Administrative Amendments or Revisions a source can apply for within a year. Additional units may be added to the source via another application if necessary.

Thank you,  
Sarah



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graeves1@aecom.com](mailto:Matt.Graeves1@aecom.com)>  
**Sent:** Tuesday, May 7, 2024 4:55 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

Sarah,

The AECOM team has been working with the Kennametal team to review additional information regarding the recently submitted amendment application for their Registration. We understand that you desire to move forward on the application, but Kennametal and AECOM will not complete our collective review by tomorrow as requested. We instead ask that IDEM continue to pause processing on the application.



If you have any questions or concerns, please feel free to contact me.

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 3:17 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

All right, thanks



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 10, 2024 2:33 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Sarah,

We certainly appreciate your interest in getting this resolved sooner than later. However,

considering the questions that came up regarding the Linishing line and the baghouse, the site is taking a closer look within their operations to see if there is anything else that may be similar in nature needing to be included in the permit. Unfortunately, their lead engineer is out this week and can't contribute to the evaluation. He will be back next week and depending on what comes of that review, we may be drafting another request for inclusion in this amendment. The site wants to be as thorough as possible to evaluate all qualifying processes and/or equipment. Accordingly, we are asking that the clock continue to be paused to allow for this review. We will have our response ready upon your return.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter

<[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

---

\$600

Registration Revision

---

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

---

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Graves, Matt](#)  
**To:** [Hartley, Heath](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#); [Germann, Sarah R \(IDEM\)](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Thursday, May 30, 2024 2:00:09 PM  
**Attachments:** [image002.png](#)  
[image004.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Heath,

My apologies for my apparent miscommunication regarding our status on the permit / registration amendment. As previously discussed with Sarah, we are in the process of reviewing additional information from Kennametal and are waiting on them for a few other details before finalizing our comments/ response with the updated information. We had asked that the clock be held on pause until we have finished with that review. We anticipate we should have the review completed soon and will submit any updates to the original amendment application. We again ask that the process continue to be held on pause until the information is complete.

I left you a voicemail with my contact number shown below.

Please let me know if you need any additional information.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Hartley, Heath <HHartley@idem.IN.gov>  
**Sent:** Thursday, May 30, 2024 1:51 PM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>; Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Since we have not received any further comments, we will issue the Registration Revision 47548. If/when you have additional units or changes needed, please submit a new permit

application.

Let me know if you have any questions.



Heath Hartley  
Section Chief  
Office of Air Quality, Permits Branch  
Indiana Department of Environmental Management

(317) 232-8217 • [hhartley@idem.IN.gov](mailto:hhartley@idem.IN.gov)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Thursday, May 30, 2024 1:14 PM

**To:** Graves, Matt <[Matt.Graeves1@aecom.com](mailto:Matt.Graeves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Good Afternoon, Matt,

I am emailing to follow-up this afternoon's voicemail. I tried contacting you last Thursday about the Registration Revision for Kennametal, and I have not since heard an update. Have you been able to speak with the source about this permit, and about the possibility of sending another application with the new units they might be adding? As of today, this permit has been on applicant review for two months, and registrations are typically only on applicant review for a week. I would appreciate an update.

Thank you,  
Sarah



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Germann, Sarah R (IDEM)

**Sent:** Thursday, May 23, 2024 11:16 AM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

I am emailing to follow up a voicemail I just sent about Kennametal. Do you have any updates for this permit which is still on applicant review? Have you discussed moving forward with this permit, and the option of submitting a new application for any additional emission units, with the source?

Thanks,  
Sarah



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Wednesday, May 15, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

Has there been any progress on the discussion about Kennametal's permit? I have made the changes to the emission unit description for the finishing line requested from applicant review on April 3<sup>rd</sup>. Since then, I have not received further comments.

The Registration Revision has been on applicant review since April 1<sup>st</sup>. Ordinarily for a permit of this level there is a one-week applicant review timeframe. If there are no additional comments, I would like to move forward with this Revision. As a reminder, there is not a limit on the number of Administrative Amendments or Revisions a source can apply for within a year. Additional units may be added to the source via another application if necessary.

Thank you,  
Sarah



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, May 7, 2024 4:55 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

Sarah,

The AECOM team has been working with the Kennametal team to review additional information regarding the recently submitted amendment application for their Registration. We understand that you desire to move forward on the application, but Kennametal and AECOM will not complete our collective review by tomorrow as requested. We instead ask that IDEM continue to pause processing on the application.

If you have any questions or concerns, please feel free to contact me.

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 3:17 PM



**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

All right, thanks



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 10, 2024 2:33 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

Sarah,

We certainly appreciate your interest in getting this resolved sooner than later. However, considering the questions that came up regarding the Linishing line and the baghouse, the site is taking a closer look within their operations to see if there is anything else that may be similar in nature needing to be included in the permit. Unfortunately, their lead engineer is out this week and can't contribute to the evaluation. He will be back next week and depending on what comes of that review, we may be drafting another request for inclusion in this amendment. The site wants to be as thorough as possible to evaluate all qualifying processes and/or equipment. Accordingly, we are asking that the clock continue to be paused to allow for this review. We will have our response ready upon your return.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann

---

Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)



---

Protecting Hoosiers and Our Environment

---

**From:** [Graves, Matt](#)  
**To:** [Hartley, Heath](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#); [Germann, Sarah R \(IDEM\)](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Friday, May 31, 2024 2:25:42 PM  
**Attachments:** [image002.png](#)  
[image004.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Heath,

As a follow-up to my email and our conversation yesterday I wanted to let you know that Kennametal is working on gathering the information we had requested of them, and I expect to get a status update Monday and will let you know where we are and have a better idea of a projected timetable.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Hartley, Heath <HHartley@idem.IN.gov>  
**Sent:** Thursday, May 30, 2024 1:51 PM  
**To:** Graves, Matt <Matt.Graves1@aecom.com>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>; Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Since we have not received any further comments, we will issue the Registration Revision 47548. If/when you have additional units or changes needed, please submit a new permit application.

Let me know if you have any questions.

Heath Hartley  
Section Chief  
Office of Air Quality, Permits Branch  
Indiana Department of Environmental Management



(317) 232-8217 • [hhartley@idem.IN.gov](mailto:hhartley@idem.IN.gov)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Thursday, May 30, 2024 1:14 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Good Afternoon, Matt,

I am emailing to follow-up this afternoon's voicemail. I tried contacting you last Thursday about the Registration Revision for Kennametal, and I have not since heard an update. Have you been able to speak with the source about this permit, and about the possibility of sending another application with the new units they might be adding? As of today, this permit has been on applicant review for two months, and registrations are typically only on applicant review for a week. I would appreciate an update.

Thank you,  
Sarah



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Thursday, May 23, 2024 11:16 AM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

I am emailing to follow up a voicemail I just sent about Kennametal. Do you have any updates for this permit which is still on applicant review? Have you discussed moving forward with this permit, and the option of submitting a new application for any additional emission units, with the source?

Thanks,  
Sarah



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Wednesday, May 15, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graeves1@aecom.com](mailto:Matt.Graeves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

Has there been any progress on the discussion about Kennametal's permit? I have made the changes to the emission unit description for the finishing line requested from applicant review on April 3<sup>rd</sup>. Since then, I have not received further comments.

The Registration Revision has been on applicant review since April 1<sup>st</sup>. Ordinarily for a permit of this level there is a one-week applicant review timeframe. If there are no additional comments, I would like to move forward with this Revision. As a reminder, there is not a limit on the number of Administrative Amendments or Revisions a source can apply for within a year. Additional units may be added to the source via another application if necessary.

Thank you,  
Sarah

Indiana Department of



Environmental Management

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, May 7, 2024 4:55 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

Sarah,

The AECOM team has been working with the Kennametal team to review additional information regarding the recently submitted amendment application for their Registration. We understand that you desire to move forward on the application, but Kennametal and AECOM will not complete our collective review by tomorrow as requested. We instead ask that IDEM continue to pause processing on the application.

If you have any questions or concerns, please feel free to contact me.

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.

M (412) 302-3591

[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 3:17 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP



All right, thanks



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 10, 2024 2:33 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

Sarah,

We certainly appreciate your interest in getting this resolved sooner than later. However, considering the questions that came up regarding the Linishing line and the baghouse, the site is taking a closer look within their operations to see if there is anything else that may be similar in nature needing to be included in the permit. Unfortunately, their lead engineer is out this week and can't contribute to the evaluation. He will be back next week and depending on what comes of that review, we may be drafting another request for inclusion in this amendment. The site wants to be as thorough as possible to evaluate all qualifying processes and/or equipment. Accordingly, we are asking that the clock continue to be paused to allow for this review. We will have our response ready upon your return.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---



**From:** [Graves, Matt](#)  
**To:** [Hartley, Heath](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#); [Germann, Sarah R \(IDEM\)](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Wednesday, June 5, 2024 5:07:42 AM  
**Attachments:** [image003.png](#)  
[image004.png](#)

---

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Heath,

Update: We received more information from Kennametal yesterday afternoon and will be reviewing that with them later today.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Graves, Matt  
**Sent:** Friday, May 31, 2024 2:25 PM  
**To:** Hartley, Heath <HHartley@idem.IN.gov>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>; Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Heath,

As a follow-up to my email and our conversation yesterday I wanted to let you know that Kennametal is working on gathering the information we had requested of them, and I expect to get a status update Monday and will let you know where we are and have a better idea of a projected timetable.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>

**Sent:** Thursday, May 30, 2024 1:51 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Since we have not received any further comments, we will issue the Registration Revision 47548. If/when you have additional units or changes needed, please submit a new permit application.

Let me know if you have any questions.



Heath Hartley  
Section Chief  
Office of Air Quality, Permits Branch  
Indiana Department of Environmental Management

(317) 232-8217 • [hhartley@idem.IN.gov](mailto:hhartley@idem.IN.gov)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Thursday, May 30, 2024 1:14 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Good Afternoon, Matt,

I am emailing to follow-up this afternoon's voicemail. I tried contacting you last Thursday about the Registration Revision for Kennametal, and I have not since heard an update. Have you been able to speak with the source about this permit, and about the possibility of sending another application with the new units they might be adding? As of today, this permit has been on applicant review for two months, and registrations are typically only on applicant review for a week. I would appreciate an update.

Thank you,  
Sarah

---

Indiana Department of  
Environmental Management  
Sarah Germann



Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Thursday, May 23, 2024 11:16 AM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

I am emailing to follow up a voicemail I just sent about Kennametal. Do you have any updates for this permit which is still on applicant review? Have you discussed moving forward with this permit, and the option of submitting a new application for any additional emission units, with the source?

Thanks,  
Sarah



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Wednesday, May 15, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

Has there been any progress on the discussion about Kennametal's permit? I have made the changes to the emission unit description for the finishing line requested from applicant review on April 3<sup>rd</sup>. Since then, I have not received further comments.

The Registration Revision has been on applicant review since April 1<sup>st</sup>. Ordinarily for a permit of this level there is a one-week applicant review timeframe. If there are no additional comments, I would like to move forward with this Revision. As a reminder, there is not a limit on the number of Administrative Amendments or Revisions a source can apply for within a year. Additional units may be added to the source via another application if necessary.

Thank you,  
Sarah



Indiana Department of  
Environmental Management

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Tuesday, May 7, 2024 4:55 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

Sarah,

The AECOM team has been working with the Kennametal team to review additional information regarding the recently submitted amendment application for their Registration. We understand that you desire to move forward on the application, but Kennametal and AECOM will not complete our collective review by tomorrow as requested. We instead ask that IDEM continue to pause processing on the application.



If you have any questions or concerns, please feel free to contact me.

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 3:17 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

All right, thanks



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Wednesday, April 10, 2024 2:33 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

We certainly appreciate your interest in getting this resolved sooner than later. However,

considering the questions that came up regarding the Linishing line and the baghouse, the site is taking a closer look within their operations to see if there is anything else that may be similar in nature needing to be included in the permit. Unfortunately, their lead engineer is out this week and can't contribute to the evaluation. He will be back next week and depending on what comes of that review, we may be drafting another request for inclusion in this amendment. The site wants to be as thorough as possible to evaluate all qualifying processes and/or equipment. Accordingly, we are asking that the clock continue to be paused to allow for this review. We will have our response ready upon your return.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter

<[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Monday, April 1, 2024 1:36 PM

**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

---

\$600

Registration Revision

---

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann



Indiana Department of  
Environmental Management

---

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

**From:** [Germann, Sarah R \(IDEM\)](#)  
**To:** [Graves, Matt](#); [Randy Porter](#)  
**Cc:** [Johnson, Julie](#); [Hartley, Heath](#)  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP  
**Date:** Thursday, June 27, 2024 1:05:00 PM  
**Attachments:** [47548calcs 6-27-24.xlsx](#)  
[47548per 6-27-24.docx](#)  
[47548tsd 6-27-24.docx](#)  
[image002.png](#)  
[image005.png](#)

---

Hello Matt and Randy,

We have not received any comments or information about your applicant review of Kennametal's Registration Revision since June 5th. Since the documents were sent on April 1st, this permit draft has been on applicant review for almost 13 weeks. I completed the changes requested on April 3rd for the finishing line. If the source has any additional units to add to the permit, they may add those by submitting a new application. If there are any requests for the revision of emission factors used in the calculations, those may also be changed or discussed within a new permit application. As a reminder, there is not a limit on the number of permit revisions or amendments a source may apply for within a year. I have attached the most recent permit draft, complete with the changes from applicant review to this email. This permit will be sent to issuance tomorrow.

Thank you,



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <Matt.Graves1@aecom.com>  
**Sent:** Wednesday, June 5, 2024 5:07 AM  
**To:** Hartley, Heath <HHartley@idem.IN.gov>; Randy Porter <randy.porter@kennametal.com>  
**Cc:** Johnson, Julie <julie.johnson@aecom.com>; Germann, Sarah R (IDEM) <SRGerman@idem.IN.gov>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

---

Heath,

Update: We received more information from Kennametal yesterday afternoon and will be reviewing that with them later today.

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.

M (412) 302-3591

[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Graves, Matt

**Sent:** Friday, May 31, 2024 2:25 PM

**To:** Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Heath,

As a follow-up to my email and our conversation yesterday I wanted to let you know that Kennametal is working on gathering the information we had requested of them, and I expect to get a status update Monday and will let you know where we are and have a better idea of a projected timetable.

Thanks,

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.

M (412) 302-3591

[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>

**Sent:** Thursday, May 30, 2024 1:51 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Since we have not received any further comments, we will issue the Registration Revision 47548. If/when you have additional units or changes needed, please submit a new permit application.

Let me know if you have any questions.



Heath Hartley  
Section Chief  
Office of Air Quality, Permits Branch  
Indiana Department of Environmental Management

(317) 232-8217 • [hhartley@idem.IN.gov](mailto:hhartley@idem.IN.gov)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Thursday, May 30, 2024 1:14 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Good Afternoon, Matt,

I am emailing to follow-up this afternoon's voicemail. I tried contacting you last Thursday about the Registration Revision for Kennametal, and I have not since heard an update. Have you been able to speak with the source about this permit, and about the possibility of sending another application with the new units they might be adding? As of today, this permit has been on applicant review for two months, and registrations are typically only on applicant review for a week. I would appreciate an update.

Thank you,  
Sarah



Indiana Department of  
Environmental Management

---

Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Germann, Sarah R (IDEM)

**Sent:** Thursday, May 23, 2024 11:16 AM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

I am emailing to follow up a voicemail I just sent about Kennametal. Do you have any updates for this permit which is still on applicant review? Have you discussed moving forward with this permit, and the option of submitting a new application for any additional emission units, with the source?

Thanks,  
Sarah



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Germann, Sarah R (IDEM)  
**Sent:** Wednesday, May 15, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello Matt,

Has there been any progress on the discussion about Kennametal's permit? I have made the changes to the emission unit description for the finishing line requested from applicant review on April 3<sup>rd</sup>. Since then, I have not received further comments.

The Registration Revision has been on applicant review since April 1<sup>st</sup>. Ordinarily for a permit of this level there is a one-week applicant review timeframe. If there are no additional comments, I would like to move forward with this Revision. As a reminder, there is not a limit on the number of Administrative Amendments or Revisions a source can apply for within a year. Additional units may be added to the source via another application if necessary.

Thank you,



Sarah



Indiana Department of  
Environmental Management

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Sent:** Tuesday, May 7, 2024 4:55 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>; Hartley, Heath <[HHartley@idem.IN.gov](mailto:HHartley@idem.IN.gov)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

The AECOM team has been working with the Kennametal team to review additional information regarding the recently submitted amendment application for their Registration. We understand that you desire to move forward on the application, but Kennametal and AECOM will not complete our collective review by tomorrow as requested. We instead ask that IDEM continue to pause processing on the application.

If you have any questions or concerns, please feel free to contact me.

Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.

M (412) 302-3591

[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>

**Sent:** Wednesday, April 10, 2024 3:17 PM

**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

All right, thanks



Indiana Department of  
Environmental Management

---

Sarah Germann

Environmental Manager

• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

---

Protecting Hoosiers and Our Environment

---

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>

**Sent:** Wednesday, April 10, 2024 2:33 PM

**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>

**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>

**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

---

Sarah,

We certainly appreciate your interest in getting this resolved sooner than later. However, considering the questions that came up regarding the Linishing line and the baghouse, the site is taking a closer look within their operations to see if there is anything else that may be similar in nature needing to be included in the permit. Unfortunately, their lead engineer is out this week and can't contribute to the evaluation. He will be back next week and depending on what comes of that review, we may be drafting another request for inclusion in this amendment. The site wants to be as thorough as possible to evaluate all qualifying processes and/or equipment. Accordingly, we are asking that the clock continue to be paused to allow for this review. We will have our response ready upon your return.

Thanks,  
matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.

M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Wednesday, April 10, 2024 2:20 PM  
**To:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Hello,

I want to let you know that I will be out of the office for two weeks starting on Monday. I would really like to get this permit issued this week. Could you please send any additional comments by afternoon tomorrow? I will send the permit to be issued on Friday.



Indiana Department of  
Environmental Management  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)

Protecting Hoosiers and Our Environment

---

**From:** Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Sent:** Friday, April 5, 2024 5:34 PM  
**To:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>; Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>  
**Cc:** Johnson, Julie <[julie.johnson@aecom.com](mailto:julie.johnson@aecom.com)>  
**Subject:** RE: Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

Sarah,

Kennametal and AECOM are in the process of reviewing the draft documents provided and would like to request a 1 week extension to allow for a more thorough review between our teams. We understand that with this request, the time clock for Registration Revision permit No.: 039-47548-00078 will be stopped pending our review and comment.

Thanks,  
Matt

**Matthew P. Graves - CHMM**

Senior Environmental Manager - EHS & Air, AECOM Technical Services Inc.  
M (412) 302-3591  
[matt.graves1@aecom.com](mailto:matt.graves1@aecom.com)

---

**From:** Germann, Sarah R (IDEM) <[SRGerman@idem.IN.gov](mailto:SRGerman@idem.IN.gov)>  
**Sent:** Monday, April 1, 2024 1:36 PM  
**To:** Randy Porter <[randy.porter@kennametal.com](mailto:randy.porter@kennametal.com)>; Graves, Matt <[Matt.Graves1@aecom.com](mailto:Matt.Graves1@aecom.com)>  
**Subject:** Applicant Review for Registration Revision No. 039-47548-00078 for Kennametal Stellite, LP

Dear Randy Porter and Matthew Graves:

Attached please find the draft Registration Revision and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration Revision permit No.: 039-47548-00078 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before April 8, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$600, which is based on the following:

\$600	Registration Revision
-------	-----------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,  
Sarah Germann

Indiana Department of  
Environmental Management  
\_\_\_\_\_  
Sarah Germann  
Environmental Manager  
• (317) 234-6555 • [srgerman@idem.IN.gov](mailto:srgerman@idem.IN.gov)



---

Protecting Hoosiers and Our Environment

---

**Appendix A: Emissions Calculations  
PTE Summary**

**Company Name: Kennametal Stellite LP**  
**Address City IN Zip: 1201 Eisenhower Dr N, Goshen, IN 46526**  
**Administrative Amendment Number: 039-47548-00078**  
**Reviewer: Sarah Germann**

Emission Unit	Uncontrolled Potential to Emit (tons/yr)							Single Highest HAP (Chromium)
	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	
Powder coating Booth A	7.67	7.67	7.67	-	-	-	-	5.40
Dust Collectors	11.87	1.19	1.19	-	-	-	-	2.07
Emergency Generator	0.12	0.12	0.12	0.11	1.73	0.14	0.37	-
Casting process heating torch	2.65E-03	0.01	0.01	8.37E-04	0.14	0.01	0.12	1.95E-06
Six (6) Thermal Jets (tower burners)	2.04E-03	0.01	0.01	6.44E-04	0.11	0.01	0.09	1.50E-06
Sintering Station furnace	0.05	0.20	0.20	0.02	2.58	0.14	2.16	3.61E-05
<b>Total</b>	<b>19.71</b>	<b>9.19</b>	<b>9.19</b>	<b>0.13</b>	<b>4.55</b>	<b>0.30</b>	<b>2.74</b>	<b>7.47</b>

\* PM2.5 listed is direct PM2.5

**Appendix A: Emission Calculations  
PTE Summary**

**Company Name:** Kennametal Stellite LP  
**Source Address:** 1201 Eisenhower Dr N, Goshen, IN 46526  
**Permit Number:** 039-47548-00078  
**Reviewer:** Sarah Germann

<b>Uncontrolled Potential to Emit HAPs (ton/year)</b>							
Pollutant/Emission Unit	Spray Booth A*	Dust Collectors	Emergency Generator	Casting process heating torch	Six (6) Thermal Jets (tower burners)	Sintering Station furnace	Total Each HAP
Acetaldehyde	--	--	2.99E-04	--	--	--	2.99E-04
Acrolein	--	--	3.61E-05	--	--	--	3.61E-05
Benzene	--	--	3.64E-04	2.93E-06	2.25E-06	5.41E-05	4.23E-04
1,3-Butadiene	--	--	1.53E-05	--	--	--	1.53E-05
Cadmium	--	--	--	1.54E-06	1.18E-06	2.83E-05	3.11E-05
Chromium	5.40	2.07	--	1.95382E-06	1.50E-06	3.61E-05	7.47E+00
Cobalt	0.77	4.25	--	--	--	--	5.02E+00
Dichlorobenzene	--	--	--	1.67E-06	1.29E-06	3.09E-05	3.39E-05
Formaldehyde	--	--	4.60E-04	1.05E-04	8.05E-05	1.93E-03	2.58E-03
Hexane	--	--	--	2.51E-03	1.93E-03	4.64E-02	5.08E-02
Lead	--	--	--	6.98E-07	5.37E-07	1.29E-05	1.41E-05
Manganese	--	--	--	5.30E-07	4.08E-07	9.79E-06	1.07E-05
Nickel	1.53	2.26	--	2.93074E-06	2.25E-06	5.41E-05	3.80E+00
Toluene	--	--	1.60E-04	4.75E-06	3.65E-06	8.76E-05	2.56E-04
Xylene	--	--	1.11E-04	--	--	--	1.11E-04
<b>Worst Case Single HAP (Chromium)</b>							<b>7.47</b>
<b>Totals</b>	<b>6.93</b>	<b>8.59</b>	<b>1.45E-03</b>	<b>2.63E-03</b>	<b>2.03E-03</b>	<b>4.86E-02</b>	<b>15.57</b>

Note:

\*Combined HAP total for the spray booth is based on the alloy with the highest HAP content, so combined HAP entry is not the sum of the rows above.

**Appendix A: Emissions Calculations  
Modification**

**Company Name: Kennametal Stellite LP  
Source Address: 1201 Eisenhower Dr N, Goshen, IN 46526  
Permit Number: 039-47548-00078  
Reviewer: Sarah Germann**

Uncontrolled Potential to Emit of New and Modified Units (tons/year)										
Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Combined HAPs	Single HAP (Cobalt)	
<b>New Units</b>										
Casting process heating torch	2.65E-03	0.01	0.01	8.37E-04	0.14	0.01	0.12	2.63E-03	2.51E-03	Hexane
Six (6) Thermal Jets (tower burners)	2.04E-03	0.01	0.01	6.44E-04	0.11	0.01	0.09	2.03E-03	1.93E-03	Hexane
Sintering Station furnace	0.05	0.20	0.20	0.02	2.58	0.14	2.16	4.86E-02	4.64E-02	Hexane
Linishing Line (Dust Collector DC12)	5.48	0.55	0.55	-	-	-	-	3.96	1.96	Cobalt
<i>PTE of New Units</i>	<i>5.53</i>	<i>0.76</i>	<i>0.76</i>	<i>0.02</i>	<i>2.82</i>	<i>0.16</i>	<i>2.37</i>	<i>4.02</i>	<i>1.96</i>	<i>Cobalt</i>
<b>Total PTE Increase (tons/year):</b>	<b>5.53</b>	<b>0.76</b>	<b>0.76</b>	<b>0.02</b>	<b>2.82</b>	<b>0.16</b>	<b>2.37</b>	<b>4.02</b>	<b>1.96</b>	<b>Cobalt</b>

\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>



**Appendix A: Emission Calculations  
VOC and PM/PM10 Emissions  
Laboratory Powder Coating Process**

**Company Name: Kennametal Stellite LP  
Address City IN Zip: 1201 Eisenhower Dr N, Goshen, IN 46526  
Administrative Amendment Number: 039-47548-00078  
Reviewer: Sarah Germann**

Unit ID	Process	Maximum Usage (lbs/hr)	**Maximum Spray Time (hrs/yr)	Transfer Efficiency	*PM/PM10/PM2.5 Potential (lb/hr)	*PM/PM10/PM2.5 Potential (ton/yr)	Control Eff. %	Controlled PM/PM10/PM2.5 (ton/yr)
A	R&D	20	1095	30%	14.00	7.67	99%	0.08

\* Assume all the PM emissions are PM10 and PM2.5 emissions.

\*\* The maximum spray time is based on 1.75 hr setup time for each 0.25 hr coating R&D project:

8,760 hr/yr \* 0.25 spray hr / (1.75 + 0.25 ) project hr = 1,095 hr/yr

Source provided transfer efficiency of 30% based on operating experience

**METHODOLOGY**

Potential VOC (lbs/hr) = Max. Usage (lbs/hr) \* Weight % Organics

Potential VOC (tons/yr) = Max. Usage (lbs/hr) \* Weight % Organics \* (8760 hr/yr) \* (1 ton/2000 lbs)

Potential PM/PM10 (lbs/hr) = Max. Usage (lbs/hr) \* (1- Weight % Volatile) \* (1-Transfer Efficiency)

Potential PM/PM10 (tons/yr) = Max. Usage (lbs/hr) \* (1- Weight % Volatile) \* (1-Transfer Efficiency) \* Max. Spray Time (hrs/yr) \*(1 ton/2000 lbs)

**Appendix A: Emission Calculations  
HAP Emissions  
Laboratory Spray Booth with Powder Coating Process**

**Company Name: Kennametal Stellite LP  
Address City IN Zip: 1201 Eisenhower Dr N, Goshen, IN 46526  
Administrative Amendment Number: 039-47548-00078  
Reviewer: Sarah Germann**

Booth	Coatings*	Maximum Usage (lbs/hr)	Maximum Spray Time** (hrs/yr)	Transfer Efficiency (%)	Weight % Chromium	Chromium Emissions (lb/hr)	Chromium Emissions (tons/yr)	Weight % Nickel	Nickel Emissions (lb/hr)	Nickel Emissions (tons/yr)	Weight % Cobalt	Cobalt Emissions (lb/hr)	Cobalt Emissions (tons/yr)	Combined HAPs (lb/hr)	Combined HAPs (tons/yr)	
A	Stelcar 9135	20.0	1,095	30%	70.4%	9.86	5.40	20.0%	2.80	1.53	0.0%	0.00	0.00	12.66	6.93	
A	Stelcar 9120	20.0	1,095	30%	4.0%	0.56	0.31	0.0%	0.00	0.00	10.0%	1.40	0.77	1.96	1.07	
Booth A worst case before controls***						9.86	5.40		2.80	1.53		1.40	0.77	12.66	6.93	
Total after controls				control efficiency	99%		0.10	0.05		0.03	0.02		0.01	0.01	0.13	0.07

\* These coatings are not produced at the source, they are purchased for resale and R&D

\*\* The maximum spray time is based on 1.75 hr setup time for each 0.25 hr coating R&D project:

8,760 hr/yr \* 0.25 spray hr / (1.75 + 0.25 ) project hr = 1,095 hr/yr

\*\*\* Only one type of coating can be applied for each booth at the same time. Therefore, the worst case scenario is using the highest HAP content coating.

Source provided transfer efficiency of 30% based on operating experience

**METHODOLOGY**

HAPs emission rate (tons/yr) = Max. Usage (lbs/hr) x (1- Transfer Efficiency) x Weight % HAP x Max. Spray Time (hrs/yr) x 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Dust Collectors for Manufacturing Processes**

Company Name: Kennametal Stellite LP  
Address City IN Zip: 1201 Eisenhower Dr N, Goshen, IN 46526  
Administrative Amendment Number: 039-47548-00078  
Reviewer: Sarah Germann

**Particulate**

Emission Unit ID	Unit ID/Control Device	Actual Quantity of Dust lb/hr	Control Efficiency	Before Controls			After Controls		
				PM Emissions	PM10 Emissions <sup>2</sup>	PM2.5 Emissions <sup>2</sup>	PM Emissions	PM10 Emissions	PM2.5 Emissions
				(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
DC1	Air Melt Tower	0.247	99.90%	1.08	0.11	0.11	1.08E-03	1.08E-04	1.08E-04
DC2-1	Fume Hood <sup>3,6</sup>	0.195	99.90%	0.85	0.09	0.09	8.53E-04	8.53E-05	8.53E-05
DC3	Air Melt Tower <sup>4</sup>	0.247	99.90%	1.08	0.11	0.11	1.08E-03	1.08E-04	1.08E-04
DC4	Cobalt Classifying	0.024	99.90%	0.11	0.01	0.01	1.05E-04	1.05E-05	1.05E-05
DC5	Iron/Nickel Classifying	0.549	99.90%	2.41	0.24	0.24	2.41E-03	2.41E-04	2.41E-04
DC7	Castable Rework <sup>5</sup>	0.123	99.90%	0.54	0.05	0.05	5.39E-04	5.39E-05	5.39E-05
DC9	Rod/Wire Casting <sup>5</sup>	0.073	99.90%	0.32	0.03	0.03	3.20E-04	3.20E-05	3.20E-05
DC12	Linishing Line <sup>6a</sup>	1.250	99.90%	5.48	0.55	0.55	5.48E-03	5.48E-04	5.48E-04
<b>Total PTE</b>				<b>11.87</b>	<b>1.19</b>	<b>1.19</b>	<b>1.19E-02</b>	<b>1.19E-03</b>	<b>1.19E-03</b>

**Notes**

- Maximum quantities of PM collected per hour provided by source, ref. R039-14366-00078
- PM10 and PM2.5 are considered to be 10% of the PM emissions, ref. R039-14366-00078
- New dust collector installed in 2006, no change in PTE, ref. R039-27309-00078
- Air melt atomization tower replaced original vacuum melt tower in 2007, PTE assumed the same as DC1, ref. R039-25404-00078
- New DC9 installed for castable rework process - no change in process PTE, DC6 moved to new rod/wire casting process - PTE assumed the same as induction furnace fume hood (DC2), 2010, ref. R039-29603-00078
- Fume hood PTE revised based on replacement specs for Baghouse DC-2.
- Throughput based on 8760 hrs/year at maximum of 50 lbs/hr. Typical usage is approximately 15 lbs/hr.

**HAPs**

Emission Unit ID	Unit ID/Control Device	PM Emissions before Controls <sup>8</sup> (tons/yr)	Uncontrolled HAP PTE Estimate <sup>7</sup>					
			Chromium content	Chromium emissions	Nickel content	Nickel emissions	Cobalt content	Cobalt emissions
			(wt %)	(tons/yr)	(wt %)	(tons/yr)	(wt %)	(tons/yr)
DC1	Air Melt Tower	1.08	17%	0.19	19%	0.21	36%	0.39
DC2-1	Fume Hood	0.85	17%	1.49E-01	19%	1.63E-01	36%	3.06E-01
DC3	Air Melt Tower	1.08	17%	0.19	19%	0.21	36%	0.39
DC4	Cobalt Classifying	0.11	17%	1.83E-02	19%	2.01E-02	36%	3.77E-02
DC5	Iron/Nickel Classifying	2.41	17%	0.42	19%	0.46	36%	8.62E-01
DC7	Castable Rework <sup>9</sup>	0.54	17%	9.40E-02	19%	1.03E-01	36%	1.93E-01
DC9	Rod/Wire Casting	0.32	17%	5.58E-02	19%	6.10E-02	36%	1.15E-01
D12	Linishing Line <sup>6a</sup>	5.48	17%	9.55E-01	19%	1.05E+00	36%	1.96E+00
<b>worst-case single HAP</b>				<b>2.07</b>		<b>2.26</b>		<b>4.25</b>
<b>worst case combined HAPs</b>						<b>8.59</b>		

**Notes** (numbers continued from table above)

- Source provided waste characterization data for the dust
- PM emissions are the same as the table above
- Castable rework emissions from removing refractory liner from furnaces, particulate assumed to be 90% refractory/10% Stellite alloys

Emission Unit ID	Unit ID/Control Device	Control Efficiency	Controlled HAP PTE Estimate		
			Chromium emissions (tons/yr)	Nickel emissions (tons/yr)	Cobalt emissions (tons/yr)
DC1	Air Melt Tower	99.9%	1.89E-04	2.07E-04	3.88E-04
DC2-1	Fume Hood	99.9%	1.49E-04	1.63E-04	3.06E-04
DC3	Air Melt Tower	99.9%	1.89E-04	2.07E-04	3.88E-04
DC4	Cobalt Classifying	99.9%	1.83E-05	2.01E-05	3.77E-05
DC5	Iron/Nickel Classifying	99.9%	4.20E-04	4.59E-04	8.62E-04
DC7	Castable Rework	99.9%	9.40E-05	1.03E-04	1.93E-04
DC9	Rod/Wire Casting	99.9%	5.58E-05	6.10E-05	1.15E-04
DC12	Linishing Line <sup>6a</sup>	99.9%	9.55E-04	1.05E-03	1.96E-03
<b>worst-case single HAP</b>			<b>2.07E-03</b>	<b>2.26E-03</b>	<b>4.25E-03</b>
<b>worst case combined HAPs</b>			<b>8.59E-03</b>		

**Methodology**

Emissions before controls, lb/hr = Actual Quantity of Dust Collected (lbs/hr) / control efficiency, %  
Emissions before controls, US tons/yr = (Emissions before controls, lb/hr) x (8760 hr/yr) / (2000 lb/US ton)  
Emissions after controls = Emissions before controls x (1 - control efficiency, %)  
New DC-2 Baghouse Actual Quantity of Dust Collected (lb/hr) = Old Baghouse Actual Quantity of Dust Collected (lb/hr) x [New Baghouse Air Volume (ACFM) / Old Baghouse Air Volume (ACFM)]

## 326 IAC 6-3-2 Evaluations

Emission Unit	Process Weight Rate (tons/hr)	PM Allowable Emission Rate (lbs/hr)	PM Potential to Emit (tons/yr)	Control Required to Meet Limit?
Linishing Line	0.03	0.35	5.48	Yes

**Appendix A: Emission Calculations**  
**Reciprocating Internal Combustion Engines - Diesel Fuel**  
**Output Rating (<=600 HP)**  
**Maximum Input Rate (<=4.2 MMBtu/hr)**

**Company Name:** Kennametal Stellite LP  
**Source Address:** 1201 Eisenhower Dr N, Goshen, IN 46526  
**Permit Number:** 039-47548-00078  
**Reviewer:** Sarah Germann

**Emissions calculated based on output rating (hp)**

Output Horsepower Rating (hp)	223.0
Maximum Hours Operated per Year	500
Potential Throughput (hp-hr/yr)	111,500

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.00205	0.0310	0.0025	0.00668
Potential Emission in tons/yr	0.12	0.12	0.12	0.11	1.73	0.14	0.37

\*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

**Hazardous Air Pollutants (HAPs)**

	Pollutant							Total PAH HAPs***
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	3.64E-04	1.60E-04	1.11E-04	1.53E-05	4.60E-04	2.99E-04	3.61E-05	6.56E-05

\*\*\*PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

\*\*\*\*Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

<b>Potential Emission of Total HAPs (tons/yr)</b>	<b>1.51E-03</b>
---	-----------------

**Methodology**

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.3-1 and 3.3-2.

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] \* [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] \* [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

**Appendix A: Emissions Calculations  
Natural Gas Combustion ( ≤ 100 MMBtu/hr)  
Rod/Wire Casting Process Heating Torch**

**Company Name:** Kennametal Stellite LP  
**Source Address:** 1201 Eisenhower Dr N, Goshen, IN 46526  
**Permit Number:** 039-47548-00078  
**Reviewer:** Sarah Germann

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.325	1020	2.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	2.65E-03	0.01	0.01	8.37E-04	**see below	0.01	0.12

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All 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 #1-02-006-02, 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

Potential Emission (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Hazardous Air Pollutants (HAPs)**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.9E-06	1.7E-06	1.0E-04	2.5E-03	4.7E-06

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	7.0E-07	1.5E-06	2.0E-06	5.3E-07	2.9E-06

<b>Potential Emission of Combined HAPs (tons/yr)</b>	<b>2.6E-03</b>
<b>Potential Emission of Highest Single HAP (tons/yr)</b>	<b>2.5E-03</b>

Hexane

**Methodology**

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.

**Note:**

Welding is not taking place in this process.

The heating torch is used to keep the ladle of the casting process hot enough to prevent molten metal from solidifying to the surface of the ladle.

There is no melting of metal, so there are not any process emissions for this unit.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion ( ≤ 100 MMBtu/hr)**  
**Six (6) Thermal Jets/Air Melt Automization Tower Burners for Heating Tundish**

**Company Name:** Kennametal Stellite LP  
**Source Address:** 1201 Eisenhower Dr N, Goshen, IN 46526  
**Permit Number:** 039-47548-00078  
**Reviewer:** Sarah Germann

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.25	1020	2.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	2.04E-03	0.01	0.01	6.44E-04	**see below	0.01	0.09

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

#### Methodology

All 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 #1-02-006-02, 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

Potential Emission (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

#### Hazardous Air Pollutants (HAPs)

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.3E-06	1.3E-06	8.1E-05	1.9E-03	3.7E-06

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.4E-07	1.2E-06	1.5E-06	4.1E-07	2.3E-06

<b>Potential Emission of Combined HAPs (tons/yr)</b>	<b>2.0E-03</b>
<b>Potential Emission of Highest Single HAP (tons/yr)</b>	<b>1.9E-03</b>

Hexane

#### Methodology

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.

#### Note:

The six burners are used to heat up the tundish and keep molten alloy which is poured into it from solidifying on the surface.

The molten alloy then enters the tower where it is converted to a powder for additional processing.

These burners are not actually heating the metal, so there are not any process emissions for these units.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion ( ≤ 100 MMBtu/hr)**  
**Furnace at the Sintering station to heat Refractory of Caster**

**Company Name:** Kennametal Stellite LP  
**Source Address:** 1201 Eisenhower Dr N, Goshen, IN 46526  
**Permit Number:** 039-47548-00078  
**Reviewer:** Sarah Germann

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
6.00	1020	51.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.05	0.20	0.20	0.02	**see below	0.14	2.16

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All 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 #1-02-006-02, 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

Potential Emission (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Hazardous Air Pollutants (HAPs)**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.4E-05	3.1E-05	1.9E-03	4.6E-02	8.8E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.3E-05	2.8E-05	3.6E-05	9.8E-06	5.4E-05

<b>Potential Emission of Combined HAPs (tons/yr)</b>	<b>4.9E-02</b>
<b>Potential Emission of Highest Single HAP (tons/yr)</b>	<b>4.6E-02</b>

Hexane

**Methodology**

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.

**Note:**

The sintering station heats/cures the refractory of a caster used in the production of retal rods from molten alloy.

The torch at the sintering station does not heat metal. It heats the refractory of the caster to remove residual moisture prior to the addition of molten metal.

This furnace unit does not directly heat metal, so there are not any process emissions for this unit.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

## REGISTRATION OFFICE OF AIR QUALITY

**Kennametal Stellite LP  
1201 Eisenhower Dr N  
Goshen, Indiana 46526**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R039-14366-00078 Master Agency Interest ID.: 11625	
Issued by: Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: August 7, 2001

Registration Revision No. 039-15682-00078, issued on February 3, 2003  
Notice-Only Change No. 039-23709-00078, issued on October 24, 2006  
Notice-Only Change No. 039-25404-00078, issued on October 31, 2007  
Notice-Only Change No. 039-29603-00078, issued on December 29, 2010  
Notice-Only Change No. 039-31339-00078, issued on February 8, 2012  
Administrative Amendment No. 039-33899-00078, issued on February 4, 2014  
Administrative Amendment No.039-35083-00078, issued on January 9, 2015  
Administrative Amendment No.039-36424-00078, issued on November 23, 2015  
Administrative Amendment No. 039-39438-00078, issued on January 30, 2018  
Administrative Amendment No. 039-40090-00078, issued on July 17, 2018  
Administrative Amendment No.039-46685-00078, issued on August 9, 2023

Registration Revision No.039-47548-00078	
Issued by:  Heath Hartley, Section Chief Permits Branch Office of Air Quality	Issuance Date:



## SECTION A

## SOURCE SUMMARY

This registration 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

### A.1 General Information

---

The Registrant owns and operates a stationary metal powder manufacturing facility.

Source Address: 1201 Eisenhower Dr N, Goshen, Indiana 46526  
General Source Phone Number: (574) 534-2585  
SIC Code: 3369 (Nonferrous Foundries, Except Aluminum and Copper)  
County Location: Elkhart County  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Registration

### A.2 Emission Units and Pollution Control Equipment Summary

---

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

- (a) Air Melt Atomization Towers furnaces, each equipped with a product cyclone that is considered integral to the process, and with two (2) fume hoods, located over the furnaces in the atomization towers, constructed in 2006, controlled by baghouse DC2-1, as follows:

Construction year	Maximum Capacity (pounds/hour)	Baghouse ID
1990	800	DC1
2007	800	DC3

- (b) Six (6) Air Melt Atomization Tower natural gas-fired burners, permitted in 2024 with a maximum capacity of 0.25 MMBTU/hr, each, using no controls. The burners are used to heat up the tundish and keep molten alloy poured into the tundish from solidifying on the surface of the tundish.
- (c) One (1) Cobalt classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC4.
- (d) One (1) Iron/Nickel classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC5.
- (e) One (1) castable rework operation, constructed in 1990, approved in 2014 for modification, with a maximum process rate of less than 100 pounds per hour, controlled by Baghouse DC7.
- (f) One (1) Rod/Wire Casting fume hood, approved for construction in 2010, with a maximum process rate of less than 100 pounds per hour, controlled by fume hood/Baghouse DC9.
- (g) One (1) Rod/Wire Casting process natural gas-fired heating torch, installed in 2011, and permitted in 2024, with a maximum capacity of 0.325 MMBTU/hr, using no controls. This

heating torch keeps the ladle hot enough to prevent molten metal from solidifying to the surface of the ladle.

- (h) One (1) welding powder coating spray booth, identified as Booth A, constructed in 2002, using a maximum usage of 20 pounds per hour and a maximum throughput rate of 24 pounds of parts per hour, controlled by Baghouse DC8. This booth is located in the Research and Development Laboratory and is used only for experimental study and testing for welding torches.
- (i) One (1) general ventilation baghouse, identified as DC-10, permitted in 2015, for ambient room dust collection and increased airflow, and exhausting within the building.
- (j) Two (2) general ventilation dust collectors, identified as DC-11 and DC2, permitted in 2018, for ambient room dust collection and increased airflow, and exhausting within the building.
- (k) One (1) finishing equipment line, constructed in 2012 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.
- (l) One (1) emergency diesel generator, identified as Gen1, permitted in 2023, with heat input capacity of 1.47 MMBtu/hr and a power output of 223 hp, using no controls, and exhausting to Stk1.

Under 40 CFR 60, Subpart IIII, this unit is considered an affected facility.

Under 40 CFR 63, Subpart ZZZZ, this unit is considered an affected new facility.

- (m) One (1) Secondary Metal Production natural gas fired furnace at the sintering station, installed in 2011, and permitted in 2024, with a maximum capacity of 6.0 MMBTU/hr, using no controls, and venting to DC-10. This unit heats the refractory of the caster to remove residual moisture prior to the addition of molten metal to the process.

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-1.1-1]

---

Terms in this registration 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 2-1.1-1) shall prevail.

### B.2 Effective Date of Registration [IC 13-15-5-3]

---

Pursuant to IC 13-15-5-3, this registration R039-14366-00078 is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

### B.3 Registration Revocation [326 IAC 2-1.1-9]

---

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

### B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

---

- (a) All terms and conditions of permits established prior to Registration No. 039-14366-00078 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 registration.

### B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)][326 IAC 2-5.5-4(a)(3)]

---

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 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, IN 46204-2251

- (c) The notification 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.

**B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]**

---

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

**B.7 Registrations [326 IAC 2-5.1-2(i)]**

---

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

**B.8 Preventive Maintenance Plan [326 IAC 1-6-3]**

---

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant 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 Registrant shall implement the PMPs.

- (b) 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 Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-5.1-2(g)][326 IAC 2-5.5-4(b)]

#### C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

### Corrective Actions and Response Steps

#### C.3 Response to Excursions or Exceedances [326 IAC 2-5.1-3(e)(2)]

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

- (a) The Registrant 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 Registrant 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 registration.
- (e) The Registrant shall record the reasonable response steps taken.

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)]**

**C.4 General Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)]**

---

- (a) Records of all required monitoring data, reports and support information required by this registration shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 Registrant, the Registrant shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this registration, for all record keeping requirements not already legally required, the Registrant shall be allowed up to ninety (90) days from the date of registration issuance or the date of initial start-up, whichever is later, to begin such record keeping.

**SECTION D.1**

**EMISSION UNIT OPERATION CONDITIONS**

Facility Description [326 IAC 2-5.1-2(f)(2)][326 IAC 2-5.5-4(a)(2)]:

- (a) Air Melt Atomization Towers furnaces, each equipped with a product cyclone that is considered integral to the process, and with two (2) fume hoods, located over the furnaces in the atomization towers, constructed in 2006, controlled by baghouse DC2-1, as follows:

Construction year	Maximum Capacity (pounds/hour)	Baghouse ID
1990	800	DC1
2007	800	DC3

- (b) One (1) Cobalt classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC4.
- (c) One (1) Iron/Nickel classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC5.
- (d) One (1) castable rework operation, constructed in 1990, approved in 2014 for modification, with a maximum process rate of less than 100 pounds per hour, controlled by Baghouse DC7.
- (e) One (1) Rod/Wire Casting fume hood, approved for construction in 2010, with a maximum process rate of less than 100 pounds per hour, controlled by fume hood/Baghouse DC9.
- (f) One (1) welding powder coating spray booth, identified as Booth A, constructed in 2002, using a maximum usage of 20 pounds per hour and a maximum throughput rate of 24 pounds of parts per hour, controlled by Baghouse.DC8. This booth is located in the Research and Development Laboratory and is used only for experimental study and testing for welding torches.
- (g) One (1) general ventilation baghouse, identified as DC-10, permitted in 2015, for ambient room dust collection and increased airflow, and exhausting within the building.
- (h) One (1) linishing equipment line, constructed in 2012 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.

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

**Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)][326 IAC 2-5.5-4(a)(1)]**

**D.1.1 Particulate [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the processes listed in the table below shall not exceed the following:

Emission Unit	Process Weight Rate (lbs/hr)	Allowable PM Limit (lbs/hr)
two (2) air melt atomization towers/DC1 and DC3	800, each	2.22, each
cobalt classifying operation/DC4	975	2.53
iron/nickel classifying operation/DC5	975	2.53
Linishing Line	50	0.35

The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions from the fume hood, the castable rework, and the Rod/Wire Casting fume hood, and the welding powder spray coating booth (Booth A) shall not exceed 0.551 lbs/hr each.

#### D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

#### Compliance Determination Requirements [326 IAC 2-5.1-2(g)][326 IAC 2-5.5-4(b)]

##### D.1.3 Cyclone Operations

In order to assure compliance with Condition D.1.1(a), the product cyclones associated with both air melt atomization towers must be in operation when the towers are in operation, as they are considered integral part of the process.

##### D.1.4 Baghouse Operations

In order to assure compliance with Condition D.1.1(b), the baghouses shall be in operation and control emissions from the associated processes at all times when these processes are in operation.

#### Compliance Monitoring Requirements [326 IAC 2-5.1-2(g)][326 IAC 2-5.5-4(b)]

##### D.1.5 Cyclone Inspection

An inspection shall be performed each calendar quarter of all cyclones controlling the two (2) air melt atomization towers, when exhausting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

##### D.1.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps shall be considered a deviation from this permit

#### Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)][326 IAC 2-5.5-4(b)]



#### D.1.7 Record Keeping Requirements

---

- (a) To document the compliance status with Condition D.1.3, the Permittee shall maintain records of the inspections required under Condition D.1.5.
  
- (b) Section C - General Record Keeping Requirements contains the Registrant's obligations with regard to the records required by this condition.

**SECTION E.1**

**NSPS**

**Emission Unit Description:**

- (a) One (1) emergency diesel generator, identified as Gen1, permitted in 2023, with a heat input capacity of 1.47 MMBtu/hr and a power output of 223 hp, using no controls, and exhausting to Stk1.

Under 40 CFR 60, Subpart IIII, this unit is considered an affected facility.  
Under 40 CFR 63, Subpart ZZZZ, this unit is considered an affected new facility.

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

**E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]**

- (a) Pursuant to 40 CFR 60.1, the Registrant shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart IIII.

- (b) Pursuant to 40 CFR 60.4, the Registrant shall submit all required notifications and reports 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

and

United States Environmental Protection Agency, Region 5  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**E.1.2 Stationary Compression Ignition Internal Combustion Engines NSPS [326 IAC 12][40 CFR Part 60, Subpart IIII]**

The Registrant shall comply with the following provisions of 40 CFR Part 60, Subpart IIII (included as Attachment A to the registration), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

- (1) 40 CFR 60.4200(a)(2)(i), (a)(4), and (c)
- (2) 40 CFR 60.4205(b)
- (3) 40 CFR 60.4206
- (4) 40 CFR 60.4207(b)
- (5) 40 CFR 60.4208(a)
- (6) 40 CFR 60.4209(a)
- (7) 40 CFR 60.4211(a), (c), (f), and (g)(2)
- (8) 40 CFR 60.4214(b), and (d)
- (9) 40 CFR 60.4218
- (10) 40 CFR 60.4219
- (11) Table 5 to 40 CFR 60, Subpart IIII

(12) Table 8 to 40 CFR 60, Subpart IIII

**SECTION E.2**

**NESHAP**

**Emission Unit Description:**

- (a) One (1) emergency diesel generator, identified as Gen1, permitted in 2023, with a heat input capacity of 1.47 MMBtu/hr and a power output of 223 hp, using no controls, and exhausting to Stk1.

Under 40 CFR 60, Subpart IIII, this unit is considered an affected facility.  
Under 40 CFR 63, Subpart ZZZZ, this unit is considered an affected new facility.

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

**E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]**

- (a) Pursuant to 40 CFR 63.1 the Registrant shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

- (b) Pursuant to 40 CFR 63.10, the Registrant shall submit all required notifications and reports 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

and

United States Environmental Protection Agency, Region 5  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**E.2.2 Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]**

The Registrant shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B to the registration), which are incorporated by reference as 326 IAC 20-82, for the emission unit(s) listed above:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
- (4) 40 CFR 63.6595(a)(7)
- (5) 40 CFR 63.6665
- (6) 40 CFR 63.6670
- (7) 40 CFR 63.6675

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**REGISTRATION  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	Kennametal Stellite LP
<b>Address:</b>	1201 Eisenhower Dr N
<b>City:</b>	Goshen, Indiana 46526
<b>Phone Number:</b>	(574) 534-2585
<b>Registration No.:</b>	039-14366-00078

I hereby certify that Kennametal Stellite LP is:

still in operation.

I hereby certify that Kennametal Stellite LP is:

no longer in operation.

in compliance with the requirements of Registration No. 039-14366-00078.

not in compliance with the requirements of Registration No. 039-14366-00078.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Phone Number:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Registration Revision**

**Source Description and Location**

<b>Source Name:</b>	<b>Kennametal Stellite LP</b>
<b>Source Location:</b>	<b>1201 Eisenhower Dr. N, Goshen, IN 46526</b>
<b>County:</b>	<b>Elkhart (Elkhart Township)</b>
<b>SIC Code:</b>	<b>3369 (Nonferrous Foundries, Except Aluminum and Copper)</b>
<b>Registration No.:</b>	<b>R 039-14366-00078</b>
<b>Registration Issuance Date:</b>	<b>August 7, 2001</b>
<b>Registration Revision No.:</b>	<b>039-47548-00078</b>
<b>Permit Reviewer:</b>	<b>Sarah Germann</b>

On February 20, 2024, the Office of Air Quality (OAQ) received an application from Kennametal Stellite LP related to changes at an existing stationary metal powder manufacturing facility.

**Existing Approvals**

The source was issued Registration No. 039-14366-00078 on August 7, 2001. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Registration Revision	039-15682-00078	February 3, 2003
Registration NOC	039-23709-00078	October 24, 2006
Registration NOC	039-25404-00078	October 30, 2007
Registration NOC	039-29603-00078	December 29, 2010
Registration NOC	039-31339-00078	February 8, 2012
Registration AA	039-33899-00078	February 4, 2014
Registration AA	039-35083-00078	January 9, 2015
Registration AA	039-36424-00078	November 23, 2015
Registration AA	039-39438-00078	January 30, 2018
Registration AA	039-40090-00078	July 17, 2018
Registration AA	039-46685-00078	August 9, 2023

**County Attainment Status**

The source is located in Elkhart County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO <sub>2</sub>	Unclassifiable or attainment effective April 9, 2018, for the 2010 primary 1-hour SO <sub>2</sub> standard. Better than national secondary standards effective March 3, 1978.
CO	Unclassifiable or attainment effective November 15, 1990.

Pollutant	Designation
O <sub>3</sub>	Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO <sub>2</sub> standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Elkhart County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
 Elkhart 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**

The fugitive emissions of regulated air pollutants and hazardous air pollutants (HAP) are counted toward the determination of Registration (326 IAC 2-5.1-5) 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.

**Source Status - Existing Source**

This table reflects the unrestricted potential emissions of the source prior to the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Unrestricted Source-Wide Emissions Prior to Revision (tons/year)								
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1,2</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>3</sup>	Total HAPs
Total PTE of Entire Source Including Source-Wide Fugitives	14.18	8.43	8.43	0.11	1.73	0.14	0.37	6.51	11.55
Exemptions Levels	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 10	< 25
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 10	< 25
<sup>1</sup> Under the Part 70 Permit program (40 CFR 70), PM <sub>10</sub> and PM <sub>2.5</sub> , not particulate matter (PM), are each considered as a "regulated air pollutant." <sup>2</sup> PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . <sup>3</sup> Single highest source-wide HAP.									

These emissions are based on the TSD of Registration Administrative Amendment No. 039-46685-00078, issued on August 9, 2023.

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Kennametal Stellite LP on February 20, 2024, relating to the addition of six (6) Air Melt Atomization Tower burners, one (1) rod/wire casting process heating torch, one (1) natural gas furnace for sintering, and one (1) dust collector on the Linishing line exhausting to Baghouse DC5.

The following is a list of the new and modified emission units and pollution control device(s):

- (a) Six (6) Air Melt Atomization Tower natural gas-fired burners, permitted in 2024 with a maximum capacity of 0.25 MMBTU/hr, each, using no controls. The burners are used to heat up the tundish and keep molten alloy poured into the tundish from solidifying on the surface of the tundish.
- (b) One (1) Rod/Wire Casting process natural gas-fired heating torch, installed in 2011, and permitted in 2024, with a maximum capacity of 0.325 MMBTU/hr, using no controls. This heating torch keeps the ladle hot enough to prevent molten metal from solidifying to the surface of the ladle.
- (c) One (1) Secondary Metal Production natural gas fired furnace at the sintering station, installed in 2011, and permitted in 2024, with a maximum capacity of 6.0 MMBTU/hr, using no controls, and venting to DC-10. This unit heats the refractory of the caster to remove residual moisture prior to the addition of molten metal to the process.

The following emission units were constructed and/or operated without a registration revision:

- (a) One (1) linishing equipment line, constructed in 2012 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.



**Enforcement Issues**

IDEM is aware that equipment has been constructed and operated prior to receipt of a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

**Emission Calculations**

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

**Permit Level Determination – Registration Revision**

The following table is used to determine the appropriate revision level under 326 IAC 2-5.5-6. This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)								
	PM	PM <sub>10</sub>	PM <sub>2.5</sub> <sup>1</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>2</sup>	Total HAPs
Casting process heating torch	negl.	0.01	0.01	negl.	0.14	0.01	0.12	negl.	negl.
Six (6) Thermal Jets (tower burners)	negl.	0.01	0.01	negl.	0.11	0.01	0.09	negl.	negl.
Sintering Station furnace	0.05	0.20	0.20	0.02	2.58	0.14	2.16	negl.	negl.
Linishing Line (Dust Collector DC12)	5.48	0.55	0.055	-	-	-	-	1.96	3.96
<b>Total PTE Before Controls of the New Emission Units:</b>	<b>5.53</b>	<b>0.76</b>	<b>0.76</b>	<b>0.02</b>	<b>2.82</b>	<b>0.16</b>	<b>2.37</b>	<b>1.96 (Cobalt)</b>	<b>4.02</b>

<sup>1</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>2</sup>Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

This Registration is being revised through a Registration Revision pursuant to 326 IAC 2-5.5-6(g), because the revision involves the construction or modification of emission units not described under 326 IAC 2-1.1-3(e)(1) through 326 IAC 2-1.1-3(e)(31).

**PTE of the Entire Source After Issuance of the Registration Revision**

The table below summarizes the after issuance source-wide unrestricted potential to emit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Unrestricted Source-Wide Emissions After Issuance (ton/year) (tons/year)c								
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1, 2</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>3</sup>	Total HAPs
Total PTE of Entire Source Including Source-Wide Fugitives	19.71	9.19	9.19	0.13	4.55	0.30	2.74	7.47	15.57
Exemptions Levels	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 10	< 25
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 10	< 25
<sup>1</sup> Under the Part 70 Permit program (40 CFR 70), PM <sub>10</sub> and PM <sub>2.5</sub> , not particulate matter (PM), are each considered as a "regulated air pollutant." <sup>2</sup> PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . <sup>3</sup> Single highest source-wide HAP.									

- (a) This proposed revision will not change the registration status of the source, because the source-wide uncontrolled/unlimited potential to emit of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, and CO will each still be within the ranges listed in 326 IAC 2-5.5-1(b)(1) and the potential to emit of all other regulated air pollutants will each still be less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source will still be subject to the provisions of 326 IAC 2-5.5 (Registrations).
- (b) This proposed revision will not change the registration status of the source, because the source-wide uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the uncontrolled/unlimited potential to emit of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). This source is an area source under Section 112 of the Clean Air Act (CAA).

**Federal Rule Applicability Determination**

Due to this proposed revision, federal rule applicability has been reviewed as follows:

**New Source Performance Standards (NSPS):**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the registration.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the registration.

**Compliance Assurance Monitoring (CAM):**

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the registration, because the unlimited potential to emit of the source is 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 - Entire Source**

Due to this proposed revision, state rule applicability has been reviewed as follows:

**326 IAC 2-5.5 (Registrations)**

Registration applicability is discussed under the PTE of the Entire Source After Issuance of the Registration Revision section of this document.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The new and modified emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**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 or Porter County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

**326 IAC 5-1 (Opacity Limitations)**

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

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) 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.

**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)**

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.5, because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

**326 IAC 6.8 (Particulate Matter Limitations for Lake County)**

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.8, because it is not located in Lake County.

<b>State Rule Applicability – Individual Facilities</b>
---

Due to this proposed revision, state rule applicability has been reviewed as follows:

Natural Gas Combustion

- 1) Tower burners
- 2) Casting Process heating torch
- 3) Sintering Station furnace

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1(b)(14), the natural gas combustion units added with this permitting action are not subject to the requirements of 326 IAC 6-3, since they each emit less than 0.551 pounds of particulate matter per hour.

**326 IAC 7-1.1 Sulfur Dioxide Emission Limitations**

These emission units are not subject to 326 IAC 326 IAC 7-1.1, because they have a potential to emit sulfur dioxide (SO<sub>2</sub>) 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, the natural gas combustion units added with this permitting action were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6, because the 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 added with this permitting action, 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 added with this permitting action, since these unit are not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Linishing Line

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Linishing Line, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not 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).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the linishing line shall not exceed 0.346 pounds per hour when operating at a process weight rate of 0.025 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

The control equipment shall be in operation at all times the linishing line is in operation, in order to comply with this limit.

<b>Proposed Changes</b>
-------------------------

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

- (1) The addition of six (6) Air Melt Atomization Tower burners, used to heat the tundish and keep molten alloy from solidifying.
- (2) The addition of one (1) rod/wire casting process heating torch, used to keep the ladle in the casting process hot enough to prevent molten metal from solidifying.
- (3) The addition of a furnace at the sintering station, used to heat the refractory of the caster, to remove residual moisture prior to introducing molten metal in the process.
- (4) The addition of dust collector DC12 at the linishing equipment line, rerouting discharge from within the building to existing baghouse DC5.

### **Additional Changes**

Upon further review, IDEM, OAQ has decided to make the following changes to the registration. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) Minor language and title updates in the B and D Sections.

\*\*\*

#### **A.2 Emission Units and Pollution Control Equipment Summary**

---

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

- (a) Air Melt Atomization Towers furnaces, each equipped with a product cyclone that is considered integral to the process, and with two (2) fume hoods, located over the furnaces in the atomization towers, constructed in 2006, controlled by baghouse DC2-1, as follows:

Construction year	Maximum Capacity (pounds/hour)	Baghouse ID
1990	800	DC1
2007	800	DC3

- (b) **Six (6) Air Melt Atomization Tower natural gas-fired burners, permitted in 2024 with a maximum capacity of 0.25 MMBTU/hr, each, using no controls. The burners are used to heat up the tundish and keep molten alloy poured into the tundish from solidifying on the surface of the tundish.**
- (bc) One (1) Cobalt classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC4.
- (ed) One (1) Iron/Nickel classifying operation, constructed in 1990, approved in 2018 for modification, with a maximum process rate of 975 pounds of metal per hour, controlled by Baghouse DC5.
- (de) One (1) castable rework operation, constructed in 1990, approved in 2014 for modification, with a maximum process rate of less than 100 pounds per hour, controlled by Baghouse DC7.
- (ef) One (1) Rod/Wire Casting fume hood, approved for construction in 2010, with a maximum process rate of less than 100 pounds per hour, controlled by fume hood/Baghouse DC9.
- (g) **One (1) Rod/Wire Casting process natural gas-fired heating torch, installed in 2011, and permitted in 2024, with a maximum capacity of 0.325 MMBTU/hr, using no controls. This heating torch keeps the ladle hot enough to prevent molten metal from solidifying to the surface of the ladle.**
- (fh) One (1) welding powder coating spray booth, identified as Booth A, constructed in 2002, using a maximum usage of 20 pounds per hour and a maximum throughput rate of 24 pounds of parts per hour, controlled by Baghouse DC8. This booth is located in the Research and Development Laboratory and is used only for experimental study and testing for welding torches.
- (gi) One (1) general ventilation baghouse, identified as DC-10, permitted in 2015, for ambient room dust collection and increased airflow, and exhausting within the building.

- (hj) Two (2) general ventilation dust collectors, identified as DC-11 and DC2, permitted in 2018, for ambient room dust collection and increased airflow, and exhausting within the building.
- (k) **One (1) linishing equipment line, constructed in 2012 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.**
- (il) One (1) emergency diesel generator, identified as Gen1, permitted in 2023, with heat input capacity of 1.47 MMBtu/hr and a power output of 223 hp, using no controls, and exhausting to Stk1.

Under 40 CFR 60, Subpart IIII, this unit is considered an affected facility.  
 Under 40 CFR 63, Subpart ZZZZ, this unit is considered an affected new facility.

- (m) **One (1) Secondary Metal Production natural gas fired furnace at the sintering station, installed in 2011, and permitted in 2024, with a maximum capacity of 6.0 MMBTU/hr, using no controls, and venting to DC-10. This unit heats the refractory of the caster to remove residual moisture prior to the addition of molten metal to the process.**

\*\*\*

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration **R039-14366-00078** is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

\*\*\*

SECTION D.1 **EMISSION UNIT OPERATION CONDITIONS**

Facility Description [326 IAC 2-5.1-2(f)(2)][326 IAC 2-5.5-4(a)(2)]:

\*\*\*

- (h) **One (1) linishing equipment line, constructed in 2012 and permitted in 2024, with a maximum throughput of 50 lb/hr, controlled by a dust collector identified as DC12, discharging to Baghouse DC5.**

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)][326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the processes listed in the table below shall not exceed the following:

Emission Unit	Process Weight Rate (lbs/hr)	Allowable PM Limit (lbs/hr)
two (2) air melt atomization towers/DC1 and DC3	800, each	2.22, each
cobalt classifying operation/DC4	975	2.53
iron/nickel classifying operation/DC5	975	2.53
<b>Linishing Line</b>	<b>50</b>	<b>0.35</b>

The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per

hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions from the fume hood, the castable rework, and the Rod/Wire Casting fume hood, and the welding powder spray coating booth (Booth A) shall not exceed 0.551 lbs/hr each.

\*\*\*

#### D.1.4 Baghouse Operations

In order to assure compliance with Condition D.1.1(b), the baghouses shall be in operation **and control emissions from the associated processes at all times** when these processes are in operation.

\*\*\*

### Conclusion and Recommendation

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 February 20, 2024.

The construction and operation of this proposed revision shall be subject to the conditions of the attached Registration Revision No. 039-47548-00078. The staff recommends to the Commissioner that the Registration Revision be approved.

### IDEM Contact

- (a) If you have any questions regarding this permit, please contact Sarah Germann, 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) 234-6555 or (800) 451-6027, and ask for Sarah Germann or (317) 234-6555.
- (b) A copy of the findings is available on the Internet at: <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: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.