

**From:** [Hite, Maddison](#)  
**To:** [damian.kline@kloeckner.com](mailto:damian.kline@kloeckner.com); [Geoff Bright](#)  
**Subject:** IDEM OAQ Contact Information for Application No. 097-47953-00869 for Kloeckner Metals Corporation  
**Date:** Wednesday, June 26, 2024 1:57:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
**Importance:** High

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Dear Damian and Geoffrey,

I am the permit writer assigned to the current application No. 097-47953-00869 for Kloeckner Metals Corporation. 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.

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 Kloeckner Metals Corporation 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,



Indiana Department of  
Environmental Management  
Maddison Hite  
OAQ Senior Environmental Manager  
• (317) 233-4972 • [MHite@idem.IN.gov](mailto:MHite@idem.IN.gov)

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**From:** [Rick Gruca](#)  
**To:** [Hite, Maddison](#); [Damian Kline](#); [Geoff Bright](#)  
**Cc:** [Stephanie Phillips](#); [Mark Flitcraft](#)  
**Subject:** Re: Applicant Review for MSOP AA No. 097-47953-00869 for Kloeckner Metals Corporation  
**Date:** Wednesday, June 26, 2024 4:42:34 PM  
**Attachments:** [image003.png](#)  
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Madison,

Thank you for allowing us to review the draft. I know that Mark Flitcraft is on PTO until next week and will want to review, so we will send any final comments/questions to you by the 4th. However, I believe I found a minor error on Page 4 of the tsd. I believe PM should be 79.23 instead of 79.22 (see attached) for source-wide potential emissions after issuance of the MSOP Administrative Amendment. Thanks.

Regards,

**Rick Gruca**

**kloeckner metals**



Vice President – Environmental, Health, Safety & Sustainability

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o: 678 259-8877 c: 678 480-2531  
[rick.gruca@kloeckner.com](mailto:rick.gruca@kloeckner.com)



**From:** Hite, Maddison <MHite@idem.IN.gov>  
**Sent:** Wednesday, June 26, 2024 03:52 PM  
**To:** Damian Kline <Damian.Kline@kloeckner.com>; Geoff Bright <geoffrey.bright@trinityconsultants.com>  
**Cc:** Stephanie Phillips <Stephanie.Phillips@kloeckner.com>; Mark Flitcraft <Mark.Flitcraft@kloeckner.com>; Rick Gruca <Rick.Gruca@kloeckner.com>  
**Subject:** Applicant Review for MSOP AA No. 097-47953-00869 for Kloeckner Metals Corporation

Some people who received this message don't often get email from mwhite@idem.in.gov. [Learn why this is important](#)

**External Email: Handle with care!**

Dear Damian and Geoffrey:

Attached please find the draft MSOP AA 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 MSOP AA permit No.: 097-47953-00869 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 (1) 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 July 4, 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.

The following documents are not including in this review but will be included in the final approval:  
AA Letter

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$0, which is based on the following:

\$0	MSOP Administrative Amendment
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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,

Indiana Department of  
Environmental Management

Maddison Hite  
OAQ Senior Environmental Manager

• (317) 233-4972 • MHite@idem.IN.gov  
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**Indiana Department of Environmental Management  
Office of Air Quality**

Technical Support Document (TSD) for an Administrative Amendment to a  
Minor Source Operating Permit (MSOP)

<b>Source Description and Location</b>
--

<b>Source Name:</b>	<b>KloECKner Metals Corporation</b>
<b>Source Location:</b>	<b>8301 East 33rd Street, Indianapolis, Indiana 46226</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>5051 (Metals Service Centers and Offices) 3441 (Fabricated Structural Metal) 3449 (Miscellaneous Structural Metal Work) 3541 (Machine Tools, Metal Cutting Type)</b>
<b>Operation Permit No.:</b>	<b>M097-43475-00869</b>
<b>Operation Permit Issuance Date:</b>	<b>July 8, 2021</b>
<b>Administrative Amendment No.:</b>	<b>097-47953-00869</b>
<b>Permit Reviewer:</b>	<b>Maddison Hite</b>

<b>Existing Approvals</b>
---------------------------

The source was issued MSOP No. M097-43475-00869 on July 8, 2021. The source has since received the following approvals:

- (a) Administrative Amendment No. 097-44852-00869, issued on January 13, 2022;
- (b) Administrative Amendment No. 097-45560-00869, issued on August 11, 2022;
- (c) Significant Permit Revision No. 097-45766-00869, issued on December 21, 2022; and
- (d) Administrative amendment No. 097-46523-00869, issued on May 5, 2023.

<b>County Attainment Status</b>
---------------------------------

The source is located in Marion 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>	Attainment effective May 21, 2020, for the 2010 SO <sub>2</sub> standard for Center, Perry, and Wayne townships. Better than national standards for the remainder of the county.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O <sub>3</sub>	Unclassifiable or attainment effective January 16, 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. Marion 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>**  
MARION 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.
- (d) **Other Criteria Pollutants**  
Marion 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**

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) 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 administrative amendment. 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.

	Source-Wide Emissions Prior to Administrative Amendment (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	Total HAPs
<b>Total PTE of Entire Source Excluding Fugitives*</b>	79.01	79.13	79.13	0.03	11.68	16.73	1.82	5.75
Title V Major Source Thresholds	--	100	100	100	10	100	100	25
<b>Total PTE of Entire Source Including Source-Wide Fugitives*</b>	85.33	80.81	79.30	0.03	11.68	16.73	1.82	5.75
MSOP Thresholds	25	25	25	25	25	25	< 100	< 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>.  
\*Fugitive HAP emissions are always included in the source-wide emissions.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (c) These emissions are based on the TSD of MSOP No. 097-46523-00869, issued on May 5, 2023.

#### Description of Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by KloECKner Metals Corporation on June 13, 2024, relating to the addition of two manual welding machines.

The following is a list of the new emission units:

- (c) Two (2) manual welding machines, permitted in 2023, with a maximum electrode consumption per station of 4.73 pounds per hour, using no control, and exhausting indoors.

#### Enforcement Issues

There are no pending enforcement actions related to this administrative amendment.

#### Emission Calculations

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

#### Permit Level Determination – MSOP Administrative Amendment

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical

or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the administrative amendment. 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
Manual Welding Machines	0.22	0.22	0.22	-	-	-	-	0.01	0.01
<b>Total PTE Before Controls of the New Emission Units:</b>	0.22	0.22	0.22	-	-	-	-	0.01	0.01

<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 administrative amendment.

Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the permit is amended to add emissions units, subject to 326 IAC 2-1.1-3 (Exemptions), at the request of the applicant.

#### PTE of the Entire Source After Issuance of the MSOP Administrative Amendment

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. 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.

	Source-Wide Emissions after Issuance (ton/year) (Uncontrolled/Unlimited)							
	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	Total HAPs
<b>Total PTE of Entire Source Excluding Fugitive Emissions*</b>	79.22	79.34	79.34	0.03	11.68	16.73	1.82	5.76
Title V Major Source Thresholds	--	100	100	100	100	100	100	25
<b>Total PTE of Entire Source Including Source-Wide Fugitives*</b>	85.54	81.03	79.51	0.03	11.68	16.73	1.82	5.76
MSOP Thresholds	25	25	25	25	25	25	< 100	< 25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--

<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>.  
\*Fugitive HAP emissions are always included in the source-wide emissions.

Commented [RG1]: I believe this should be 79.23

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

- (a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the uncontrolled/unlimited potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-6.1 (MSOP) and is an area source under Section 112 of the Clean Air Act (CAA).



- (b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### **Federal Rule Applicability Determination**

Due to the administrative amendment, 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 permit for this administrative amendment.

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

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Source Standards for Nine Metal Fabrication and Finishing Categories 40 CFR 63, Subpart XXXXXX are not included in the permit for this source. Although this source is located in an area source of HAPs and does perform fabricated structural metal and/or miscellaneous metal work, these are not the primary production at the source.

Under 40 CFR 63.11522, Primarily Engaged means the manufacturing, fabricating, or forging of one or more products listed in one of the nine metal fabrication and finishing source category descriptions in Table 1, "Descriptions of Source Categories Affected by this Subpart, " where this production represents at least 50 percent of the production at a facility, and where production quantities are established by the volume, linear foot, square foot, or other value suited to the specific industry. The period used to determine production should be the previous continuous 12 months of operation. Facilities must document and retain rationale for the determination that their facility is not "primarily engaged" pursuant to §63.10(b)(3) of the General Provisions.

Accordingly, the source's revenue generated by fabricated structural metal (SIC 3441) and/or miscellaneous metal work (SIC 3449) only accounts for 11%, whereas, the primary revenue is generated by metal service centers (SIC 5051), making it the primary operation at the source. Therefore, the source is not subject to the provisions of this subpart.

- (b) 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 permit for this administrative amendment.

##### **Compliance Assurance Monitoring (CAM):**

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, 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 administrative amendment, state rule applicability has been reviewed as follows:

##### **326 IAC 2-6.1 (MSOP)**

MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP Administrative Amendment section of this document.

##### **326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)**

PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP Administrative Amendment section of this document.

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

The new 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 one of the Lake or Porter County townships listed under 326 IAC 2-6-1(a)(2), 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 permit:

- (1) Opacity shall not exceed an average of thirty percent (30%) 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)**

This source (located in Marion County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide PTE of PM is 10 tons per year or more. Therefore, this source is subject to the requirements of 326 IAC 6.5-1-2 because the source-wide actual emissions of PM can be 10 tons per year or more.

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

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Marion 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>
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Due to the administrative amendment, state rule applicability has been reviewed as follows:

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

Pursuant to 326 IAC 6-3-1(c)(3), the welding units are not subject to the requirements of 326 IAC 6-3, since these units are subject to more stringent limitations under 326 IAC 6.5.

**326 IAC 6.5 PM Limitations Except Lake County**

Since this source is located in Marion county and has a source-wide potential to emit (PTE) greater than 10 tons per year, it is subject to 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the new welding stations shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

#### Compliance Determination and Monitoring Requirements

- (a) The Compliance Determination Requirements applicable to this administrative amendment are as follows:

##### Testing Requirements:

- (1) IDEM OAQ has determined that testing of the welding units is not required at this time to determine compliance with the particulate emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.

- (b) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

There are no new or modified compliance requirements included with this administrative amendment.

#### Proposed Changes

The following changes listed below are due to the proposed administrative amendment. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) Section A.2 has been amended to include the new manual welding machines.
- (2) Section D.1 has been amended to include the new manual welding machines in the emission unit descriptions.

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

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

\*\*\*

- (g) Twenty-~~two~~ (22) manual welding machines, sixteen (16) constructed in 1998 through 2013 ~~and four (4) constructed in 2023,~~ **and two (2) constructed in 2024**, each with a maximum electrode consumption per station of 4.73 pounds per hour, using no controls, and exhausting indoors.

\*\*\*

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

##### Emissions Unit Description:

\*\*\*

- (g) Twenty-~~two~~ (20) manual welding machines, sixteen (16) constructed in 1998 through 2013 ~~and, four (4) constructed in 2023,~~ **and two (2) constructed in 2024**, each with a maximum electrode consumption per station of 4.73 pounds per hour, using no controls, and exhausting indoors.

\*\*\*

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the thermal metal cutting operations, the hand plasma cutter, the natural gas combustion units, the welding operations, the shearing operation, and the de-slugging unit shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

\*\*\*

**Additional Changes**

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

- (1) The MSOP Annual Notification Form has been revised to remove two (2) sentences that were inadvertently added to the form.
- (2) The MSOP Annual Notification Form has been revised to include space for an email address and phone number.

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

MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5). ~~The initial notification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent notifications shall cover the time period from January 1 to December 31 of the previous year.~~

\*\*\*

Authorized Individual (typed):	
Title:	
Signature:	Date:
Date:Email Address:	Phone:

\*\*\*

**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 June 13, 2024.

<b>IDEM Contact</b>
---------------------

- (a) If you have any questions regarding this permit, please contact Maddison Hite, 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) 233-4972 or (800) 451-6027, and ask for Maddison Hite or (317) 233-4972.
- (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:** [Rick Gruca](#)  
**To:** [Hite, Maddison](#)  
**Subject:** Re: Applicant Review for MSOP AA No. 097-47953-00869 for Kloeckner Metals Corporation  
**Date:** Tuesday, July 2, 2024 9:19:06 AM  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)  
[image014.png](#)  
[image015.png](#)  
[image002.png](#)  
[Outlook-j0lsxieo.png](#)  
[Outlook-guhzxmvo.png](#)  
[Outlook-koommvxn.png](#)  
[Outlook-hw4zlucw.png](#)  
[Outlook-ohfbdiyn.png](#)  
[Outlook-pkfn5taf.png](#)

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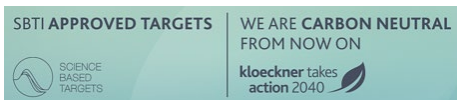
---

Thank you for your assistance!

Regards,

**Rick Gruca**

**kloeckner metals**



Vice President – Environmental, Health, Safety & Sustainability

500 Colonial Center Parkway Suite 500 Roswell, GA 30076

o: 678 259-8877 c: 678 480-2531

[rick.gruca@kloeckner.com](mailto:rick.gruca@kloeckner.com)



---

**From:** Hite, Maddison <MHite@idem.IN.gov>

**Sent:** Tuesday, July 2, 2024 09:13 AM

**To:** Rick Gruca <Rick.Gruca@kloeckner.com>

**Subject:** RE: Applicant Review for MSOP AA No. 097-47953-00869 for Kloeckner Metals Corporation

Thank you.



Indiana Department of  
Environmental Management

Maddison Hite  
OAQ Senior Environmental Manager

• (317) 233-4972 • [MHite@idem.IN.gov](mailto:MHite@idem.IN.gov)  
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---

**From:** Rick Gruca <[Rick.Gruca@kloeckner.com](mailto:Rick.Gruca@kloeckner.com)>

**Sent:** Monday, July 1, 2024 4:55 PM

**To:** Hite, Maddison <[MHite@idem.IN.gov](mailto:MHite@idem.IN.gov)>; Damian Kline <[Damian.Kline@kloeckner.com](mailto:Damian.Kline@kloeckner.com)>; Geoff Bright <[geoffrey.bright@trinityconsultants.com](mailto:geoffrey.bright@trinityconsultants.com)>

**Cc:** Stephanie Phillips <[Stephanie.Phillips@kloeckner.com](mailto:Stephanie.Phillips@kloeckner.com)>; Mark Flitcraft <[Mark.Flitcraft@kloeckner.com](mailto:Mark.Flitcraft@kloeckner.com)>

**Subject:** Re: Applicant Review for MSOP AA No. 097-47953-00869 for Kloeckner Metals Corporation

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---

Maddison,

We do not have any further comments. Thank you!

Regards,

**Rick Gruca**

**kloeckner metals**



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---

**From:** Hite, Maddison <[MHite@idem.IN.gov](mailto:MHite@idem.IN.gov)>  
**Sent:** Wednesday, June 26, 2024 03:52 PM  
**To:** Damian Kline <[Damian.Kline@kloeckner.com](mailto:Damian.Kline@kloeckner.com)>; Geoff Bright <[geoffrey.bright@trinityconsultants.com](mailto:geoffrey.bright@trinityconsultants.com)>  
**Cc:** Stephanie Phillips <[Stephanie.Phillips@kloeckner.com](mailto:Stephanie.Phillips@kloeckner.com)>; Mark Flitcraft <[Mark.Flitcraft@kloeckner.com](mailto:Mark.Flitcraft@kloeckner.com)>; Rick Gruca <[Rick.Gruca@kloeckner.com](mailto:Rick.Gruca@kloeckner.com)>  
**Subject:** Applicant Review for MSOP AA No. 097-47953-00869 for Kloeckner Metals Corporation

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**External Email: Handle with care!**

Dear Damian and Geoffrey:

Attached please find the draft MSOP AA 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 MSOP AA permit No.: 097-47953-00869 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 (1) 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 July 4, 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.

The following documents are not including in this review but will be included in the final approval:  
AA Letter

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$0, which is based on the following:

\$0	MSOP Administrative Amendment
-----	-------------------------------

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,

Indiana Department of  
Environmental Management





Maddison Hite  
OAQ Senior Environmental Manager

• (317) 233-4972 • [MHite@idem.IN.gov](mailto:MHite@idem.IN.gov)

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**To:** [Rick Gruca](#)  
**Subject:** RE: Applicant Review for MSOP AA No. 097-47953-00869 for Kloeckner Metals Corporation  
**Date:** Tuesday, July 2, 2024 9:38:00 AM  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
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[image012.png](#)  
[image013.png](#)  
[image014.png](#)  
[image016.png](#)  
[image017.png](#)  
[image002.png](#)  
**Importance:** High

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Regarding the 0.01 change to PM you mentioned in the TSD last week, I don't believe it's an error because it matches the calculations, and I double checked the calculations to make sure they were correct.

Thank you!

---

---

---

---

---

**Rick Gruca**

**kloeckner metals**



Vice President – Environmental, Health, Safety & Sustainability

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**Cc:** Stephanie Phillips <[Stephanie.Phillips@kloeckner.com](mailto:Stephanie.Phillips@kloeckner.com)>; Mark Flitcraft <[Mark.Flitcraft@kloeckner.com](mailto:Mark.Flitcraft@kloeckner.com)>

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**Cc:** Stephanie Phillips <[Stephanie.Phillips@kloECKner.com](mailto:Stephanie.Phillips@kloECKner.com)>; Mark Flitcraft <[Mark.Flitcraft@kloECKner.com](mailto:Mark.Flitcraft@kloECKner.com)>; Rick Gruca <[Rick.Gruca@kloECKner.com](mailto:Rick.Gruca@kloECKner.com)>

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Sincerely,



Indiana Department of  
Environmental Management

Maddison Hite

OAQ Senior Environmental Manager

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**BILLING WORKSHEET**  
**MSOP, Registration, Exemptions**

For Applications Received On and After October 1, 2019

Permit #: 097-47953-00869  
 Permit Reviewer: MSOP AA  
 Application Received Date: 13-Jun-24

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary) and check the appropriate box or fill in the number of reviews. The total fee will be calculated at the bottom and transferred to the billing amount on the first page. Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

*Note: See "Transition scenarios - permits and fees" document located in SharePoint for more information on handling transition permits and associated fees.*

MSOP Fees			
<input type="checkbox"/>		\$100	MSOP
<input type="checkbox"/>		\$600	MSOP w/NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP w/NSR (120)*
<input type="checkbox"/>		\$600	MSOP Min Permit Revision (45)
<input type="checkbox"/>		\$100	MSOP Renewal
<input type="checkbox"/>		\$600	MSOP Renewal / Minor NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP Renewal / Sig NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP NSC (Minor PSD/EO) (120)
<input type="checkbox"/>		\$6,000	MSOP NSC (Major PSD/EO) (270)
<input type="checkbox"/>		\$3,500	MSOP SPR (Minor PSD/EO) (120)
<input type="checkbox"/>		\$6,000	MSOP SPR (Major PSD/EO) (270)
<input type="checkbox"/>		\$100	MSOP Relocation
* Bill \$600 when the permit includes a modification (new or modified equipment) at MPR levels. Bill \$3500 when the permit includes a modification (new or modified equipment) at SPR levels.			

Registration Fees			
<input type="checkbox"/>		\$600	Registration – (New Source subject to 326 IAC 2-5.1-2)
<input type="checkbox"/>		\$100	Registration Relocation
<input type="checkbox"/>		\$600	Registration Revision and Re-Registration – (Existing Sources subject to 326 IAC 2-5.5)

Exemption Fees			
<input type="checkbox"/>		\$100	Exemption

NSPS / NESHAP / 326 IAC 8-1-6 BACT / 326 IAC 2-4.1 MACT Review			
Number of Reviews	Total Fee	Fee	See "NSPS-NESHAP-BACT Billing Info" document for instructions.
		\$500	for each review for an applicable NSPS
		\$500	for each review for an applicable NESHAP
		\$600	times each 326 IAC 8-1-6 BACT and each 326 IAC 2-4.1 MACT
For each best available control technology (BACT) analysis for VOC under 326 IAC 8-1-6 and for each maximum achievable control technology (MACT) under 326 IAC 2-4.1. [326 IAC 2-1.1-7(m)(5)]			

Other Fees			
<input type="checkbox"/>		\$500	Interim – Any type
<input type="checkbox"/>		\$500	Public Hearing

**\$0 Total Applicable Fee**

### OAQ Permits Branch Invoice Worksheet

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary). Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

Source Name: Kloeckner Metals Corporation

TEMPO AI: 12321

Permit #: 097-47953-00869

CST #:

Credit for permit fees: \$

Credit Received Date:

**Note:** IDEM's accounting office requires that fee bills or refunds, be sent to the accounts Department at the billing address listed on application. If a courtesy copy is needed, please indicate at the bottom of this page.

**Permit Reviewer please indicate applicable fees on page #2. Total will carry over to this page.**

Total Due: \$ \$0

Total Credit: \$ \$0

**Total Permitting Fees Applicable:** \$ \$0

**Total Refund Due:**

\$

Reason for Refund:

**Adjustments to Applicable Fees:**

\$

Explanation of adjustments:

**A courtesy copy of the billing has been requested by the applicant, please send to:**

**Name/Title:**

**Address:**

**Permit Reviewer:**

Maddison Hite

**Date:**

6/21/2024