

From: Hanafy, Mohamed S
To: Clint.Hutchcraft@lenexsteel.com
Cc: jrichards@augustmack.com; CALILUNG, IRYN
Subject: IDEM OAQ Contact Information for Application No. 097-47633-00951 for Lenex Steel Company
Date: Wednesday, March 20, 2024 8:56:00 AM
Attachments: [image002.png](#)

Dear Clint Hutchcraft,

I am the permit writer assigned to the current application No. 097-47633-00951 for Lenex Steel Company. 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.

To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format) and other supporting documents used as part of your application.

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 Lenex Steel Company 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 (Iryn Calilung) may be contacted at 317-233-5692 or ICALILUN@idem.IN.gov.

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

Sincerely,



Mohamed S. Hanafy
Environmental Manager
OAQ Permits Branch
Indiana Department of Environmental Management

317-234-4907 • MHanafy@idem.IN.gov

From: [Susan Burkett](#)
To: [Hanafy, Mohamed S](#)
Subject: FW: IDEM OAQ Contact Information for Application No. 097-47633-00951 for Lenex Steel Company
Date: Thursday, March 21, 2024 2:58:43 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image009.png](#)
[Attachment B Calculations Indy.xlsx](#)

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

From: Susan Burkett
Sent: Wednesday, March 20, 2024 2:41 PM
To: mhanafy@idem.IN
Cc: Clint Hutchcraft <clint.hutchcraft@lenexsteel.com>; Duane.Geiger@lenexsteel.com; Gardner, Will <WGardner@taftlaw.com>; Jennifer Richards <jrichards@augustmack.com>; Chuck Staehler <CStaehler@augustmack.com>; ICALILUN@idem.IN.gov
Subject: FW: IDEM OAQ Contact Information for Application No. 097-47633-00951 for Lenex Steel Company

Dear Mr. Hanafy,

Attached are the requested calculations in Excel format. If you need any additional information please let us know.

Sincerely,



Expertise. Innovation.
Commitment. Nationwide.



Susan Burkett
Technical Principal of Compliance
August Mack Environmental, Inc.
Email: sburkett@augustmack.com
Phone: 317.916.8000 | Mobile: 717.606.4242
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From: Hanafy, Mohamed S <MHanafy@idem.IN.gov>
Sent: Wednesday, March 20, 2024 8:56 AM
To: Clint.Hutchcraft@lenexsteel.com <Clint.Hutchcraft@lenexsteel.com>
Cc: Jennifer Richards <JRichards@augustmack.com>; CALILUNG, IRYN <ICALILUN@idem.IN.gov>
Subject: IDEM OAQ Contact Information for Application No. 097-47633-00951 for Lenex Steel

Company

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Mohamed S. Hanafy
Environmental Manager
OAQ Permits Branch
Indiana Department of Environmental Management

317-234-4907 • MHanafy@idem.IN.gov

Source-wide Emissions Summary

Company Name: Lenex Steel Company
Address City IN Zip: 2902 Tobey Dr. Indianapolis, IN 46219

Emission Units	Unrestricted Potential to Emit (tons/year)									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Highest Single HAP	Total HAP	
Spray Painting Operation	10.26	10.26	10.26	-----	-----	23.37	-----	Toluene	0.21	0.21
Welding and Flame Cutting	0.95	0.95	0.95	-----	-----	-----	-----	Manganese	0.07	0.07
Insignificant Activities										
Machining and Grinding	0.09	0.04	0.04	-----	-----	-----	-----	Manganese	0.00	0.00
Natural Gas Combustion	0.04	0.17	0.17	0.01	2.25	0.12	1.89	Hexane	0.04	0.04
Wet Cutting	-----	-----	-----	-----	-----	0.32	-----	-----	-----	0.00
Total without Fugitives:	11.34	11.42	11.42	0.01	2.25	23.82	1.89	Toluene	0.21	0.32
Fugitive Emissions										
Paved Roads	0.65	0.13	0.03	-----	-----	0.00	-----	-----	-----	-----
Total with Fugitives:	12.00	11.56	11.46	0.01	2.25	23.82	1.89	Toluene	0.21	0.32

Coatings

Company Name: Lenex Steel Company
Address City IN Zip: 2902 Tobey Dr. Indianapolis, IN 46219

Coatings Properties

FAST DRY 4190 LIGHT GRAY PRIMER (unthinned)

As per the SDS provided by the manufacturer (PPG), the Fast Dry 4190 Light Gray Primer has an unthinned VOC content of 2.815 lbs/gallon.

As per the SDS provided by the manufacturer (PPG), the Fast Dry 4190 Light Gray Primer has an unthinned solids content of 77.207%.

As per the SDS provided by the manufacturer (PPG), the Fast Dry 4190 Light Gray Primer weighs 12.35 lbs per gallons as applied.

As applied:

2.815 pounds of VOC per gallon

As per the SDS provided by the manufacturer (PPG), the Fast Dry 4190 Light Gray Primer contains one HAP, toluene at less than 1%.

PTE PM Emissions: (80% transfer efficiency)

12.35 lbs/gal

77.21% solids

9.54 lbs of solids / gallon

2.86 lbs PM / hour

12.53 tons PM / year

Solvents Used for Paint Equipment Cleaning

		VOC Content
MEK	0.09 gallons per hour	100%

Painting Operations

Company Name: Lenex Steel Company
Address City IN Zip: 2325 S 6th St. Terre Haute, IN 47802

Unlimited/Uncontrolled Potential to Emit

Material	Density (lbs/gal)	Weight % Volatile (H2O and Organics)	Weight % Water	Weight % Organics	Gal. of Mat. (gal/unit)	Maximum (units/hr)	Maximum (gal/day)	Pounds of VOC per gallon of coating less water	Pounds of VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate potential (tons per year)	Transfer Efficiency (%)	Potential HAPs (Toluene) (pounds per hour)	Potential HAPs (Toluene) (pounds per day)	Potential HAPs (Toluene) (tons per year)
Fast Dry 4190	12.35	45.00%	22.79%	22.21%	1.00	1.725	41.40	2.80	2.74	4.73	113.54	20.72	10.26	80.00%	0.05	1.14	0.21
Worst Case Usage (1 paint gun)							41.40	Worst Case PTE (1 paint gun)		4.73	113.54	20.72	10.26		0.05	1.14	0.21

METHODOLOGY

Pounds of VOC per gallon of coating less water = Density (lbs/gal) * Weight % Organics / (1-Volume% Water)
Pounds of VOC per gallon of coating = Density (lb/ton) * Weight % Organics
Potential VOC (lb/hr) = Pounds of VOC per gallon of coating * Gal. of Mat (gal/unit) * Maximum (units/hr)
Potential VOC (lbs/day) = Potential VOC (lbs/hr) * 24 (hr/day)
Potential VOC (tons/yr) = Potential VOC (lbs/hr) * 8760 (hr/yr) / 2000 (ton/lb)
Particulate Potential (tons/yr) = Maximum (units/hr) * Gal. of Mat. (gal/unit) * (1- Weight % Non-volatiles)* (1-Transfer Efficiency)* 8760 (hr/yr) /2000 (tons/lb)
Maximum paint usage calculated based on 2022 total paint usage of 3,813 gallons in 2,210 operating hours (M-F 7:00 to 3:30)
for an hourly paint usage of 1.725 gallons per hour

Unlimited/Uncontrolled Potential to Emit for Solvent Usage

Material	Density (lbs/gal)	Weight % Volatile	Gal. of Mat. (gal/unit)	Maximum (units/hr)	Maximum (gal/day)	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Potential HAP (pounds per hour)	Potential HAP (pounds per day)	Potential HAP (tons per year)
MEK	6.72	100.00%	1.00	0.09	2.16	0.60	14.51	2.65	0.00	0.00	0.00
Worst Case Usage (1 paint gun)						0.60	14.51	2.65	0.00	0.00	0.00

METHODOLOGY

Potential VOC (lb/hr) = Pounds of VOC per gallon of solvent * Gal. of Mat (gal/unit) * Maximum (units/hr)
Potential VOC (lbs/day) = Potential VOC (lbs/hr) * 24 (hr/day)
Potential VOC (tons/yr) = Potential VOC (lbs/hr) * 8760 (hr/yr) / 2000 (ton/lb)
Maximum solvent usage calculated based on 2022 total solvent usage of 190 gallons in 2,210 operating hours (M-F 7:00 to 3:30)
for an hourly solvent usage of 0.09 gallons per hour

Total PTE for Painting includes Paint and Solvent Used	VOCs	HAPs
	23.37	0.21

Welding and Thermal Cutting

**Company Name: Lenex Steel Company
Address City IN Zip: 2902 Tobey Dr. Indianapolis, IN 46219**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	17	1.85		0.0055	0.0005			0.173	0.016	0.000	0	0.016
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma**	4	0.78	60	0.0039				0.044	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.22	0.02	0.00	0.00	0.02
Potential Emissions lbs/day								5.20	0.38	0.00	0.00	0.38
Potential Emissions tons/year								0.95	0.07	0.00	0.00	0.07

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Machining and Grinding Operations

Company Name: Lenex Steel Company
Address City IN Zip: 2902 Tobey Dr. Indianapolis, IN 46219

Unit ID	Quantity	Maximum Capacity (lbs/hr)	Emission Factors* (lbs/ton)		Particulates			
			PM	PM10	PM		PM10/PM2.5**	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Production Activities								
Grinder	1	1,000.00	0.01	0.0045	0.01	0.02	0.00	0.01
Metal Saw Cutting	1	1,000.00	0.01	0.0045	0.01	0.02	0.00	0.01
Drill Press	1	2,000.00	0.01	0.0045	0.01	0.04	0.00	0.02
Totals					0.09		0.04	

Unit ID	Metal Fabrication HAPs									
	Copper Content (%)	Chromium Content (%)	Lead Content (%)	Manganese Content (%)	Nickel Content (%)	Cadmium (tons/year)	Chromium (tons/year)	Lead (tons/year)	Manganese (tons/year)	Nickel (tons/year)
Production Activities										
Grinder	0.06%	1.00%	0.00%	2.00%	1.00%	0.00	0.00	0.00	0.00	0.00
Metal Saw Cutting	0.06%	1.00%	0.00%	2.00%	1.00%	0.00	0.00	0.00	0.00	0.00
Drill Press	0.06%	1.00%	0.00%	2.00%	1.00%	0.00	0.00	0.00	0.00	0.00
Totals						0.00	0.00	0.00	0.00	0.00

Total HAPs: 0.00

Notes

Emission Factors are from EPA Air Emissions Inventories, Vol. II, Ch. 14, Castings Finishing, SCC #3-04-003-60

*The emission factors for PM and PM10 are from AP 42-11.24-2 Metallic Minerals Processing -Dry Grinding (Table 11.24-2, SCC#30302410). In the absence of valid AP 42 emission factors, PM 2.5 emissions are assumed equal to PM10 emissions.

** Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a regulated air pollutant. US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

Metal Fabrication HAPs Content (%) from SDS sheet for mild steel

Methodology

Emission Rate for PM and PM₁₀ before controls (lbs/hr) = Maximum capacity (lbs/hr) * (1 ton/2000 lbs) * Emission Factor (lbs/ton)

Emission Rate for PM and PM₁₀ before controls (tons/yr) = Emission Rate (lbs/hr) * (8760 hours/1 year) *(1 ton/2000 lbs)

Emission Rate for PM and PM₁₀ after controls (lbs/hr) = Emission Rate (lbs/hr) before controls * (1-control efficiency)

Emission Rate for PM and PM₁₀ after controls (tons/yr) = Emission Rate after controls (lbs/hr) * (8760 hours/1 year) * (1 ton/2000 lbs)

Uncontrolled PTE of Metal HAP (ton/yr) = Uncontrolled PTE of PM (tons/yr) x Metal HAP Content (%)

**Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: Lenex Steel Company
Address City IN Zip: 2902 Tobey Dr. Indianapolis, IN 46219**

Maximum Heat Input Capacity (MMBtu/hr)	Number of Units	Total Input Capacity (MMBtu/hr)
0.35	15	5.25

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
5.3	1020	45.1

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
			7.6		**see below		
Potential Emission in tons/yr	0.04	0.17	0.17	0.01	2.25	0.12	1.89

*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

Potential Emission in lbs/hr = Potential Emission in tons/yr * 1 ton/2000 lbs * 8760 hrs/1 year

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

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
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	4.7E-05	2.7E-05	1.7E-03	0.04	7.7E-05	0.04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
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	1.1E-05	2.5E-05	3.2E-05	8.6E-06	4.7E-05	1.2E-04

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.

Total HAPs	0.04
Worst HAP	0.04

**Wet Cutting and Grinding
One (1) Band Saw**

**Company Name: Lenex Steel Company
Address City IN Zip: 2902 Tobey Dr. Indianapolis, IN 46219**

Maximum amount of cutting fluid used =	12001.2	pounds
Percent VOC of cutting fluid =	5.38%	
Percent HAP of cutting fluid =	0.00%	
Potential uncontrolled VOC Emissions (lb/yr) =	645.66	lbs/yr
Potential uncontrolled VOC Emissions (ton/yr) =	0.32	tons/yr
Potential HAP Emissions (ton/yr) =	0.00	tons/yr

Methodology:

Potential uncontrolled VOC Emissions (lb/yr) = Amount of cutting fluid (lb/yr) x %VOC

Potential uncontrolled PM/PM10/PM2.5 Emissions (ton/yr) = negligible since cutting fluid is used

The band saw utilizes Lenox Band-Ade Fabricator as the cutting fluid

VOC and HAP content provided by the manufacturer

Cutting fluid does not contain HAPs

Maximum amount of cutting fluid used determined based on average use of 3024 pounds during normal operating hour (7 to 3:30pm M to F or 2,210 hour per year) for an hourly usage of 1.37 lbs per hour. Maximum amount used of 12001.2 pounds calculated based on 8,760 hours per year.

Fugitive Dust Emissions - Paved Roads

Company Name: Lenex Steel Company
Address City IN Zip: 2902 Tobey Dr. Indianapolis, IN 46219

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	4.0	1.0	4.0	40.0	160.0	900	0.170	0.7	248.9
Vehicle (leaving plant) (one-way trip)	4.0	1.0	4.0	13.0	52.0	1200	0.227	0.9	331.8
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
Totals			8.0		212.0			1.6	580.7

Average Vehicle Weight Per Trip =

26.5

 tons/trip
 Average Miles Per Trip =

0.20

 miles/trip

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	26.5	26.5	26.5	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
 where p =

125

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N =

365

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	2.461	0.492	0.1208	lb/mile
Mitigated Emission Factor, Eext =	2.250	0.450	0.1105	lb/mile

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	0.28	0.06	0.01
Vehicle (leaving plant) (one-way trip)	0.37	0.07	0.02
	0.00	0.00	0.00
	0.00	0.00	0.00
Totals		0.65	0.13

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particle Matter (<2.5 um)
 PTE = Potential to Emit

From: [Jennifer Richards](#)
To: [Hanafy, Mohamed S](#)
Subject: FW: IDEM OAQ Contact Information for Application No. 097-47633-00951 for Lenex Steel Company
Date: Wednesday, May 1, 2024 9:20:35 AM
Attachments: [image001.png](#)
[image002.png](#)
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Mr. Hanafy,
Good morning. I wanted to check in and see if you had any updates on the air permit for the facility. If you have any questions, please let me know.



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From: Susan Burkett <SBurkett@augustmack.com>
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Cc: Clint Hutchcraft <clint.hutchcraft@lenexsteel.com>; Duane.Geiger@lenexsteel.com; Gardner, Will <WGardner@taftlaw.com>; Jennifer Richards <JRichards@augustmack.com>; Chuck Staehler <CStaehler@augustmack.com>; ICALILUN@idem.IN.gov
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Dear Mr. Hanafy,

Attached are the requested calculations in Excel format. If you need any additional information please let us know.

Sincerely,

Susan Burkett
Technical Principal of Compliance



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Commitment. Nationwide.



August Mack Environmental, Inc.
Email: sburkett@augustmack.com
Phone: 317.916.8000 | Mobile: 717.606.4242
941 Wheatland Avenue, Suite 401
Lancaster, PA 17603
augustmack.com

From: Hanafy, Mohamed S <MHanafy@idem.IN.gov>
Sent: Wednesday, March 20, 2024 8:56 AM
To: Clint.Hutchcraft@lenexsteel.com <Clint.Hutchcraft@lenexsteel.com>
Cc: Jennifer Richards <JRichards@augustmack.com>; CALILUNG, IRYN <ICALILUN@idem.IN.gov>
Subject: IDEM OAQ Contact Information for Application No. 097-47633-00951 for Lenex Steel Company

Dear Clint Hutchcraft,

I am the permit writer assigned to the current application No. 097-47633-00951 for Lenex Steel Company. 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.

To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format) and other supporting documents used as part of your application.

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 Lenex Steel Company 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 (Iryn Calilung) may be contacted at 317-233-5692 or ICALILUN@idem.IN.gov.

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

Sincerely,



Mohamed S. Hanafy
Environmental Manager
OAQ Permits Branch
Indiana Department of Environmental Management

From: [Hanafy, Mohamed S](#)
To: [Jennifer Richards](#)
Cc: [CALILUNG, IRYN](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 097-47633-00951 for Lenex Steel Company
Date: Wednesday, May 1, 2024 9:42:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image012.png](#)

Good morning – I am still working on the Application No. 097-47633-00951, I'll update you once the permit is ready for applicant review.

Thank you,
Mohamed

From: Jennifer Richards <JRichards@augustmack.com>
Sent: Wednesday, May 1, 2024 9:20 AM
To: Hanafy, Mohamed S <MHanafy@idem.IN.gov>
Subject: FW: IDEM OAQ Contact Information for Application No. 097-47633-00951 for Lenex Steel Company

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Mr. Hanafy,
Good morning. I wanted to check in and see if you had any updates on the air permit for the facility. If you have any questions, please let me know.



Expertise. Innovation.
Commitment. Nationwide.



Jennifer M. Richards
Senior Compliance Consultant
August Mack Environmental, Inc.
Email: jrichards@augustmack.com
Mobile: 317.363.7138
1302 North Meridian Street, Suite 300
Indianapolis, IN 46202
augustmack.com

From: Susan Burkett <SBurkett@augustmack.com>
Sent: Wednesday, March 20, 2024 2:41 PM
To: mhanafy@idem.IN

Cc: Clint Hutchcraft <clint.hutchcraft@lenexsteel.com>; Duane.Geiger@lenexsteel.com; Gardner, Will <WGardner@taftlaw.com>; Jennifer Richards <JRichards@augustmack.com>; Chuck Staehler <CStaehler@augustmack.com>; ICALILUN@idem.IN.gov

Subject: FW: IDEM OAQ Contact Information for Application No. 097-47633-00951 for Lenex Steel Company

Dear Mr. Hanafy,

Attached are the requested calculations in Excel format. If you need any additional information please let us know.

Sincerely,



Expertise. Innovation.
Commitment. Nationwide.



Susan Burkett
Technical Principal of Compliance
August Mack Environmental, Inc.
Email: sburkett@augustmack.com
Phone: 317.916.8000 | Mobile: 717.606.4242
941 Wheatland Avenue, Suite 401
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Sincerely,



Mohamed S. Hanafy
Environmental Manager
OAQ Permits Branch
Indiana Department of Environmental Management

317-234-4907 • MHanafy@idem.IN.gov

From: [Hanafy, Mohamed S](#)
To: Clint.Hutchcraft@lenexsteel.com; [Jennifer Richards](#)
Cc: [CALILUNG, IRYN](#)
Subject: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Date: Thursday, May 9, 2024 4:45:00 PM
Attachments: [image002.png](#)
[47633tsd AR.docx](#)
[47633 calcs AR.xlsx](#)
[47633per AR.docx](#)
Importance: High

Dears Clint Hutchcraft and Jennifer Richards:

Attached please find the draft Registration 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 permit No.: 097-47633-00951 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 **May 16, 2024**, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

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Attachment A: 40 CFR Part 60, Subpart XXXXXX

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$1,100, which is based on the following:

\$600	Registration - New Source
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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.

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Environmental Manager
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Indiana Department of Environmental Management

317-234-4907 • MHanafy@idem.IN.gov

From: [Jennifer Richards](#)
To: [Hanafy, Mohamed S](#); Clint.Hutchcraft@lenexsteel.com
Cc: [CALILUNG, IRYN](#)
Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Date: Monday, May 13, 2024 1:46:17 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image009.png](#)

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Mr. Hanafy,
Could we have one more week for review? We will need to have discussions with our client and would like a bit more time.

Thank you,



Expertise. Innovation.
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Jennifer M. Richards
Senior Compliance Consultant
August Mack Environmental, Inc.
Email: jrichards@augustmack.com
Mobile: 317.363.7138
1302 North Meridian Street, Suite 300
Indianapolis, IN 46202
augustmack.com

From: Hanafy, Mohamed S <MHanafy@idem.IN.gov>
Sent: Thursday, May 9, 2024 4:46 PM
To: Clint.Hutchcraft@lenexsteel.com; [Jennifer Richards <JRichards@augustmack.com>](mailto:Jennifer.Richards@augustmack.com)
Cc: CALILUNG, IRYN <ICALILUN@idem.IN.gov>
Subject: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Importance: High

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Sincerely,



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Environmental Manager
OAQ Permits Branch
Indiana Department of Environmental Management

317-234-4907 • MHanafy@idem.IN.gov

From: [Hanafy, Mohamed S](#)
To: [Jennifer Richards](#)
Cc: Clint.Hutchcraft@lenexsteel.com; [CALILUNG, IRYN](#)
Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Date: Monday, May 13, 2024 2:19:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image007.png](#)

Ms. Richards,

You are being allotted one more week to provide comments, please provide your comments on or before May 23, 2024, please let me know if you have any questions.

Regards,



Mohamed S. Hanafy
Environmental Manager
OAQ Permits Branch
Indiana Department of Environmental Management

317-234-4907 • MHanafy@idem.IN.gov

From: Jennifer Richards <JRichards@augustmack.com>
Sent: Monday, May 13, 2024 1:46 PM
To: Hanafy, Mohamed S <MHanafy@idem.IN.gov>; Clint.Hutchcraft@lenexsteel.com
Cc: CALILUNG, IRYN <ICALILUN@idem.IN.gov>
Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company

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Jennifer M. Richards
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August Mack Environmental, Inc.

Email: jrichards@augustmack.com
Mobile: 317.363.7138

1302 North Meridian Street, Suite 300
Indianapolis, IN 46202
augustmack.com

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To: Clint.Hutchcraft@lenexsteel.com; Jennifer Richards <JRichards@augustmack.com>
Cc: CALILUNG, IRYN <ICALILUN@idem.IN.gov>
Subject: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Importance: High

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Sincerely,



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Environmental Manager
OAQ Permits Branch
Indiana Department of Environmental Management

317-234-4907 • MHanafy@idem.IN.gov

From: [Jennifer Richards](#)
To: [Hanafy, Mohamed S](#)
Cc: [Clint.Hutchcraft@lenexsteel.com](#); [CALILUNG, IRYN](#); [Alic Bent](#); [Ashley Hobbs](#)
Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Date: Thursday, May 23, 2024 10:57:04 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image010.png](#)
[image011.png](#)

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Mr. Hanafy,
Good morning. We have one response to the Indianapolis Lenex Steel facility's draft air permit:

- In Section D.1.1. for the Painting Operation – the section talks about the process being controlled and that if overspray is observed the correction actions need to be taken and documented, etc. However, the description and calculations, states the operation is uncontrolled and there is no other control devices. We request the following for IDEM to consider:
 - Take a PM limit of <10 tpy on the coating process to avoid the requirement to add particulate control.

Please let us know if you have any questions.

Thanks,



Expertise. Innovation.
Commitment. Nationwide.



Jennifer M. Richards
Senior Compliance Consultant
August Mack Environmental, Inc.
Email: jrichards@augustmack.com
Mobile: 317.363.7138
1302 North Meridian Street, Suite 300
Indianapolis, IN 46202
augustmack.com

From: Hanafy, Mohamed S <MHanafy@idem.IN.gov>
Sent: Monday, May 13, 2024 2:19 PM
To: Jennifer Richards <JRichards@augustmack.com>
Cc: Clint.Hutchcraft@lenexsteel.com; CALILUNG, IRYN <ICALILUN@idem.IN.gov>
Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company

Ms. Richards,

You are being allotted one more week to provide comments, please provide your comments on or before May 23, 2024, please let me know if you have any questions.

Regards,



Mohamed S. Hanafy
Environmental Manager
OAQ Permits Branch
Indiana Department of Environmental Management

317-234-4907 • MHanafy@idem.IN.gov

From: Jennifer Richards <JRichards@augustmack.com>
Sent: Monday, May 13, 2024 1:46 PM
To: Hanafy, Mohamed S <MHanafy@idem.IN.gov>; Clint.Hutchcraft@lenexsteel.com
Cc: CALILUNG, IRYN <ICALILUN@idem.IN.gov>
Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company

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Mr. Hanafy,
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Thank you,



Jennifer M. Richards
Senior Compliance Consultant
August Mack Environmental, Inc.
Email: jrichards@augustmack.com
Mobile: 317.363.7138
1302 North Meridian Street, Suite 300
Indianapolis, IN 46202
augustmack.com

From: Hanafy, Mohamed S <MHanafy@idem.IN.gov>
Sent: Thursday, May 9, 2024 4:46 PM
To: Clint.Hutchcraft@lenexsteel.com; Jennifer Richards <JRichards@augustmack.com>
Cc: CALILUNG, IRYN <ICALILUN@idem.IN.gov>
Subject: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Importance: High

Dears Clint Hutchcraft and Jennifer Richards:

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To: [Jennifer Richards](#)
Cc: [Clint.Hutchcraft@lenexsteel.com](#); [CALILUNG, IRYN](#)
Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Date: Friday, June 7, 2024 9:03:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image007.png](#)
[47633calcs AR2.xlsx](#)
[47633per AR2.docx](#)
[47633tsd AR2.docx](#)
Importance: High

Dears Clint Hutchcraft and Jennifer Richards:

Attached, please find the Registration Permit and supporting documents for a second review; this second review is based on the last update from Lenex Steel Company comments; if there are any comments, please let me know by the end of June 11, 2024.

Thank you,



Mohamed S. Hanafy
Environmental Manager
OAQ Permits Branch
Indiana Department of Environmental Management

317-234-4907 • MHanafy@idem.IN.gov

From: Jennifer Richards <JRichards@augustmack.com>
Sent: Thursday, May 23, 2024 10:57 AM
To: Hanafy, Mohamed S <MHanafy@idem.IN.gov>
Cc: Clint.Hutchcraft@lenexsteel.com; [CALILUNG, IRYN](#) <ICALILUN@idem.IN.gov>; [Alic Bent](mailto:AlicBent@augustmack.com) <AlicBent@augustmack.com>; [Ashley Hobbs](mailto:AshleyHobbs@augustmack.com) <AshleyHobbs@augustmack.com>
Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company

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Cc: CALILUNG, IRYN <ICALILUN@idem.IN.gov>

Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company

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Environmental Manager
OAQ Permits Branch
Indiana Department of Environmental Management

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From: [Jennifer Richards](#)
To: [Hanafy, Mohamed S](#)
Cc: [Clint.Hutchcraft@lenexsteel.com](#); [CALILUNG, IRYN](#); [tyler.prater@lenexsteel.com](#); [Ashley Hobbs](#); [Alic Bent](#)
Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Date: Tuesday, June 11, 2024 11:28:10 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image010.png](#)
[image011.png](#)

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Mobile: 317.363.7138
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augustmack.com

From: Hanafy, Mohamed S <MHanafy@idem.IN.gov>
Sent: Friday, June 7, 2024 9:04 AM
To: Jennifer Richards <JRichards@augustmack.com>
Cc: [Clint.Hutchcraft@lenexsteel.com](#); [CALILUNG, IRYN](#) <ICALILUN@idem.IN.gov>
Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Importance: High

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Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Date: Friday, June 28, 2024 3:58:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image007.png](#)
[47633calcs AR3.xlsx](#)
[47633tsd AR3.docx](#)
[47633per AR3.docx](#)

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Cc: [Clint.Hutchcraft@lenexsteel.com](#); [CALILUNG, IRYN](#); [tyler.prater@lenexsteel.com](#)
Subject: RE: Applicant Review for Registration No. 097-47633-00951 for Lenex Steel Company
Date: Monday, July 1, 2024 1:28:24 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image008.png](#)

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Mohamed,

On section D.1.7 could we revise this section to only be a requirement to have instructions place at or near the painting operation?



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