

From: [Hite, Maddison](#)
To: [Ali Kahl](#); csims@kelleyauto.com
Subject: RE: IDEM OAQ Contact Information for Application No. 003-47873-00541 for Kelley Body Shop (1425 Progress Road)
Date: Thursday, June 13, 2024 10:13:00 AM
Attachments: [Welding.xlsx](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)
[image001.png](#)
Importance: High

Thank you!

Would you mind filling this out for the welding facilities?



Indiana Department of
Environmental Management

Maddison Hite
OAQ Senior Environmental Manager

• (317) 233-4972 • MHite@idem.IN.gov

Protecting Hoosiers and Our Environment

 |  |  |  |  | www.idem.IN.gov

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From: Ali Kahl <akahl@gmgenvirosafe.com>

Sent: Thursday, June 13, 2024 8:40 AM

To: Hite, Maddison <MHite@idem.IN.gov>; csims@kelleyauto.com

Subject: Re: IDEM OAQ Contact Information for Application No. 003-47873-00541 for Kelley Body Shop (1425 Progress Road)

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

Hi Maddison,

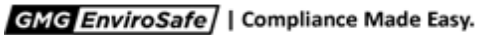
Thank you for reaching out and letting us know. Yes, they have all the items you listed 1-5.

Thank you,

Allison Kahl

Team Leader – Permits & Research

C: 815.703.2190 | East Peoria, IL



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

Sent: Wednesday, June 12, 2024 12:22 PM

To: csims@kelleyauto.com <csims@kelleyauto.com>; Permits <permits@gmgenvirosafe.com>

Subject: IDEM OAQ Contact Information for Application No. 003-47873-00541 for Kelley Body Shop (1425 Progress Road)

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We are meticulous! Please do not click links or open attachments unless you can confirm the sender. Report any suspicious activity to IT by submitting a ticket on the Help Desk in Teams.

Dear Chad and Brandon,

I am the permit writer assigned to the current application No. 003-47873-00541 for Kelley Body Shop (1425 Progress Road). 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.

Based on my preliminary review of the application, please specify whether or not you have any insignificant activities such as:

- (1) Natural gas-fired combustion sources with heat input less than or equal to ten million (10,000,000) British thermal units per hour
- (2) Buffing, Grinding, Sanding.
- (3) Office Supplies, photocopying, and paper shredding.
- (4) Safety and emergency equipment including fire suppression systems.
- (5) Air compressors.
- (6) Welding operations.

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 Kelley Body Shop 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.

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

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**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name:
Source Address:
Permit Number:
Reviewer:

Process	Number of Stations	Maximum electrode consumption per station (lbs/hr)	Maximum electrode consumption per station (lbs/day)		Emission Factors* (lb pollutant/lb electrode)				Potential to Emit (lbs/hr)				HAPs (lbs/hr)
					PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	
Welding													
Submerged Arc	1		0		0.036	0.011			0.000	0.000	0	0	0.000
Metal Inert Gas (MIG)(carbon steel)	1		0		0.0052	3.18E-04			0.000	0.0E+00	0	0	0.0E+00
Stick (E7018 electrode)	1		0		0.0211	0.0009			0.000	0.0E+00	0	0	0.0E+00
Tungsten Inert Gas (TIG)(carbon steel)	1		0		0.0055	0.0005			0.000	0.0E+00	0	0	0.0E+00
Oxyacetylene(carbon steel)	1		0		0.0055	0.0005			0.000	0.0E+00	0	0	0.0E+00
Flame Cutting	Number of Stations	Maximum Metal Thickness Cut (inches)	Maximum Metal Cutting Rate (inches/minute)	Maximum Metal Cutting Rate (inches/hour)	Emission Factors (lb pollutant/1,000 inches cut, 1 inch thick)**				Potential to Emit (lbs/hr)				HAPs (lbs/hr)
					PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	
Oxyacetylene	1			0	0.1622	0.0005	0.0001	0.0003	0.000	0.0E+00	0.0E+00	0.0E+00	0.000
Oxymethane	1			0	0.0815	0.0002		0.0002	0.000	0.0E+00	0.00	0.0E+00	0.000
Plasma**	1			0	0.0039				0.000	0.00	0.00	0.00	0.000
Totals													
Potential to Emit (lbs/hr)									0.00	0.0E+00	0.0E+00	0.0E+00	0.0E+00
Potential to Emit (lbs/day)									0.00	0.000	0.0E+00	0.000	0.000
Potential to Emit (tons/year)									0.00	0.0E+00	0.0E+00	0.0E+00	0.0E+00

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 plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

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: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hr) x (Emission Factor, lb pollutant/1,000 inches cut, 8 mm thick)

Cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Thickness, inches) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hour) x (Emission Factor, lb pollutant/1,000 inches cut, 1" thick)

Welding: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum electrode consumption per station, lbs/hr) x (Emission Factor, lb pollutant/lb of electrode used)

Potential to Emit (lbs/day) = Potential to Emit (lbs/hr) x (24 hours/day)

Potential to Emit (tons/year) = Potential to Emit (lbs/hr) x (8,760 hours/year) x (1 ton/2,000 lbs)

From: [Ali Kahl](#)
To: [Hite, Maddison](#); csims@kelleyauto.com
Subject: Re: IDEM OAQ Contact Information for Application No. 003-47873-00541 for Kelley Body Shop (1425 Progress Road)
Date: Friday, June 14, 2024 11:53:15 AM
Attachments: [image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)
[image001.png](#)
[Outlook-ibsou3cs.png](#)
[Welding - Kelley Body Shop - 1425 Progress Rd.xlsx](#)

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Hi Maddison,

See attached & let me know if you need anything additional.

Thanks,

Allison Kahl

Team Leader – Permits & Research
C: 815.703.2190 | East Peoria, IL

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From: Hite, Maddison <MHite@idem.IN.gov>
Sent: Thursday, June 13, 2024 9:13 AM
To: Ali Kahl <akahl@gmgenvirosafe.com>; csims@kelleyauto.com <csims@kelleyauto.com>
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Allison Kahl

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

Sent: Wednesday, June 12, 2024 12:22 PM

To: csims@kelleyauto.com <csims@kelleyauto.com>; Permits <permits@gmgenvirosafe.com>

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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.

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

Sincerely,

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: Kelley Body Shop
1425 Progress
Road
Source Address: Fort Wayne, IN
46808
Permit Number:
Reviewer:

Process	Number of Stations	Maximum electrode consumption per station (lbs/hr)	Maximum electrode consumption per station (lbs/day)	Emission Factors* (lb pollutant/lb electrode)				Potential to Emit (lbs/hr)				HAPs (lbs/hr)	
				PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr		
Welding													
Submerged Arc	0		0		0.036	0.011			0.000	0.000	0	0	0.000
Metal Inert Gas (MIG)(carbon steel)	1	0.9615	23.076		0.0055	0.0005			0.005	4.8E-04	0	0	4.8E-04
Stick (E7018 electrode)	0		0		0.0211	0.0009			0.000	0.0E+00	0	0	0.0E+00
Tungsten Inert Gas (TIG)(carbon steel)	0		0		0.0055	0.0005			0.000	0.0E+00	0	0	0.0E+00
Oxyacetylene(carbon steel)	0		0		0.0055	0.0005			0.000	0.0E+00	0	0	0.0E+00
Flame Cutting	Number of Stations	Maximum Metal Thickness Cut (inches)	Maximum Metal Cutting Rate (inches/minute)	Maximum Metal Cutting Rate (inches/hour)	Emission Factors (lb pollutant/1,000 inches cut, 1 inch thick)**				Potential to Emit (lbs/hr)				HAPs (lbs/hr)
					PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	
Oxyacetylene	1	1	1	60	0.1622	0.0005	0.0001	0.0003	0.010	3.0E-05	6.0E-06	1.8E-05	0.000
Oxymethane	0			0	0.0815	0.0002		0.0002	0.000	0.0E+00	0.00	0.0E+00	0.000
Plasma**	0			0	0.0039				0.000	0.00	0.00	0.00	0.000
Totals													
Potential to Emit (lbs/hr)									0.02	5.1E-04	6.0E-06	1.8E-05	5.3E-04
Potential to Emit (lbs/day)									0.36	0.012	1.4E-04	0.000	0.013
Potential to Emit (tons/year)									0.07	2.2E-03	2.6E-05	7.9E-05	2.3E-03

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 plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

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From: [Ali Kahl](#)
To: [Hite, Maddison](#); [Permits](#); csims@kelleyauto.com
Subject: Re: Applicant Review for SSOA No. 003-47873-00541 for Kelley Body Shop
Date: Friday, June 28, 2024 11:54:14 AM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[Outlook-f00ctvhn.png](#)

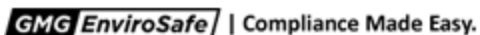
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Thanks Maddison, I have no comments.

Have a great weekend!

Allison Kahl

Team Leader – Permits & Research
C: 815.703.2190 | East Peoria, IL



From: Hite, Maddison <MHite@idem.IN.gov>
Sent: Thursday, June 27, 2024 2:21 PM
To: Permits <permits@gmgenvirosafe.com>; csims@kelleyauto.com <csims@kelleyauto.com>
Subject: Applicant Review for SSOA No. 003-47873-00541 for Kelley Body Shop

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Dear Chad, Brandon, and Ali:

Attached please find the draft SSOA 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 SSOA permit No.: 003-47873-00541 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:

Attachment A: 326 IAC 8-10

Attachment B: 40 CFR 63, Subpart HHHHHH

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$1,586, which is based on the following:

\$793	SSOA
\$793	NESHAP Review (Subpart HHHHHH)

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

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