



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

To: Interested Parties

Date: July 2, 2024

From: Jenny Acker, Chief
Permits Branch
Office of Air Quality

Source Name: Kloeckner Metals Corporation

Permit Level: MSOP Administrative Amendment

Permit Number: 097-47953-00869

Source Location: 8301 East 33rd Street, Indianapolis, Indiana 46226

Type of Action Taken: Changes that are administrative in nature

Notice of Decision: Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, choose Search Option **by Permit Number**, then enter permit 47953. This search will also provide the application received date and **final** permit issuance date.

The final decision is also available via IDEM's Virtual File Cabinet (VFC). Please go to: <https://www.in.gov/idem> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

(continues on next page)

If you would like to request a paper copy of the permit document, please contact IDEM's Office of Records Management:

IDEM - Office of Records Management
Indiana Government Center North, Room 1207
100 North Senate Avenue
Indianapolis, IN 46204
Phone: (317) 232-8667
Fax: (317) 233-6647
Email: IDEMFILEROOM@idem.in.gov

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Indiana Office of Administrative Law Proceedings, 100 N. Senate Avenue Suite N802, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Indiana Office of Administrative Law Proceedings (OALP)
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OALP by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OALP by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 2, 2024

Damian Kline
Kloeckner Metals Corporation
8301 East 33rd Street
Indianapolis, Indiana 46226

Re: 097-47953-00869
Administrative Amendment to
MSOP No. M097-43475-00869

Dear Damian Kline:

Kloeckner Metals Corporation was issued a Minor Source Operating Permit (MSOP) No. M097-43475-00869 on July 8, 2021 for a stationary metalworking facility that processes a variety of metal products, including but not limited to structural beams and tubing, channels, angles, pipes, bars, flats, plates, sheet products, grating, expanded metal, and flooring products, located at 8301 East 33rd Street, Indianapolis, Indiana 46226. On June 13, 2024, the Office of Air Quality (OAQ) received an application from the source requesting to add two (2) new manual welding machines.

Pursuant to the provisions of 326 IAC 2-6.1-6(d), the permit is hereby administratively amended as described in the attached Technical Support Document.

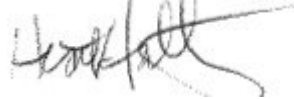
Please find attached the entire MSOP as amended.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the application and permit is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <https://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <https://www.in.gov/idem/airpermit/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

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

If you have any questions regarding this matter, please contact 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.

Sincerely,



Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

Attachment(s): Updated Permit and Technical Support Document

cc: File - Marion County
Marion County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch



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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

New Source Construction and Minor Source Operating Permit

OFFICE OF AIR QUALITY

Kloeckner Metals Corporation
8301 East 33rd Street
Indianapolis, Indiana 46226

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

| | |
|---|--|
| Operation Permit No.: M097-43475-00869 | |
| Master Agency Interest ID: 12321 | |
| Original Signed / Issued by: Heath Hartley, Section Chief Permits Branch Office of Air Quality | Issuance Date: July 8, 2021 Expiration Date: July 8, 2026 |

Administrative Amendment No.: 097-44852-00869, issued January 13, 2022
Administrative Amendment No.: 097-45560-00869, issued August 11, 2022
Significant Permit Revision No.: 097-45766-00869, issued December 21, 2022
Administrative Amendment No.: 097-46523-00869, issued May 5, 2023


| | |
|--|--|
| Administrative Amendment No.: 097-47953-00869 | |
| Issued by:  Heath Hartley, Section Chief Permits Branch Office of Air Quality | Issuance Date: July 2, 2024 Expiration Date: July 8, 2026 |

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary metalworking facility that processes a variety of metal products, including but not limited to structural beams and tubing, channels, angles, pipes, bars, flats, plates, sheet products, grating, expanded metal, and flooring products.

| | |
|------------------------------|---|
| Source Address: | 8301 East 33rd Street, Indianapolis, Indiana 46226 |
| General Source Phone Number: | (317) 964-2612 |
| SIC Code: | 5051 (Metals Service Centers and Offices) 3441 (Fabricated Structural Metal) 3449 (Miscellaneous Structural Metal Work) 3541 (Machine Tools, Metal Cutting Type) |
| County Location: | Marion |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) cutting tables, identified as ST and MK, constructed in 2000, approved in 2022 for modification, each consisting of four (4) oxyfuel torches with a maximum capacity of 380.36 linear inches cut per hour and one (1) plasma torch with a maximum capacity of 70 pounds of metal removed per hour, using water tables as control, and exhausting indoors.
- (b) One hand plasma cutter, approved in 2022 for modification, with a maximum capacity of 100 pounds of metal removed per year, using no controls, and exhausting indoors.
- (c) One (1) two-head plasma cutting table, identified as AL, constructed in 2000, with a maximum capacity of 70 pounds of metal removed per hour, using water tables as control, and exhausting indoors.
- (d) One (1) plasma cutting and six (6) saw coolant operations, constructed in 2000, with a total maximum usage of 1.11 gallons per hour.
- (e) Twenty-nine (29) natural gas comfort heaters as follows:

| Process Type | Quantity | Heat Input Capacity (MMBtu/hr) (each) | Construction Year | Exhausting |
|--------------|----------|---------------------------------------|-------------------|------------|
| Heaters | 25 | 0.15 | 2014 | Outside |
| Heaters | 2 | 0.13 | 2013, 1998 | Outside |

| | | | | |
|--------|---|-------|------|---------|
| Heater | 1 | 0.10 | 2018 | Outside |
| Heater | 1 | 0.093 | 2016 | Outside |

- (f) Three (3) submerged arc welding stations, constructed in 2019 and 2023, each with a maximum electrode consumption per station of 24 pounds per hour, using no controls, and exhausting indoors.
- (g) Twenty-two (22) manual welding machines, sixteen (16) constructed in 1998 through 2013, 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.
- (h) Two (2) manual stud welding machines; one manual stud welding machine constructed in 2022, and one manual stud welding machine constructed between 1998 through 2013, each with a maximum electrode consumption of 4.73 pounds per hour, using no controls, and exhausting indoors.
- (i) One (1) manual aerosol spray paint, consisting of 10 different paints, constructed in 1998, with a maximum combined usage of 0.07 gallons per hour, using no controls, and exhausting indoors.
- (j) Six (6) metal shearing operation, constructed in 2012, with a maximum throughput rate of 1.0 ton per hour, each, using no controls, and exhausting indoors.
- (k) Unpaved Roads.
- (l) One (1) de-slagger machine, used for cutting off burrs and rounding edges, permitted in 2022, with a maximum capacity of 1 ton of metal per hour, using a dust collector as control, and exhausting indoors.

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)][326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.
- (b) If actual construction of the emission units differs from the construction described in the application, the source may not continue operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M097-43475-00869, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.7 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.8 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.9 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M097-43475-00869 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:

- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.17 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.20 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

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

- (a) 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.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1][IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.7 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.11 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.
- (c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.15 General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) cutting tables, identified as ST and MK, constructed in 2000, approved in 2022 for modification, each consisting of four (4) oxyfuel torches with a maximum capacity of 380.36 linear inches cut per hour and one (1) plasma torch with a maximum capacity of 70 pounds of metal removed per hour, using water tables as control, and exhausting indoors.
- (b) One hand plasma cutter, approved in 2022 for modification, with a maximum capacity of 100 pounds of metal removed per year, using no controls, and exhausting indoors.
- (c) One (1) two-head plasma cutting table, identified as AL, constructed in 2000, with a maximum capacity of 70 pounds of metal removed per hour, using water tables as control, and exhausting indoors.
- (d) One (1) plasma cutting and six (6) saw coolant operations, constructed in 2000, with a total maximum usage of 1.11 gallons per hour.
- (e) Twenty-nine (29) natural gas comfort heaters as follows:

| Process Type | Quantity | Heat Input Capacity (MMBtu/hr) (each) | Construction Year | Exhausting |
|--------------|----------|---------------------------------------|-------------------|------------|
| Heaters | 25 | 0.15 | 2014 | Outside |
| Heaters | 2 | 0.13 | 2013, 1998 | Outside |
| Heater | 1 | 0.10 | 2018 | Outside |
| Heater | 1 | 0.093 | 2016 | Outside |

- (f) Three (3) submerged arc welding stations, constructed in 2019 and 2023, each with a maximum electrode consumption per station of 24 pounds per hour, using no controls, and exhausting indoors.
- (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.
- (h) Two (2) manual stud welding machines; one manual stud welding machine constructed in 2022, and one manual stud welding machine constructed between 1998 through 2013, each with a maximum electrode consumption of 4.73 pounds per hour, using no controls, and exhausting indoors.
- (j) Six (6) metal shearing operation, constructed in 2012, with a maximum throughput rate of 1.0 ton per hour, each, using no controls, and exhausting indoors.
- (l) One (1) de-slagger machine, used for cutting off burrs and rounding edges, permitted in 2022, with a maximum capacity of 1 ton of metal per hour, using a dust collector as control, 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-slagging unit shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

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

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

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.3 Particulate Control

In order to assure compliance with Condition D.1.1, the water tables for particulate control shall be in operation and control emissions from the two (2) oxyfuel cutting tables (ST and MK) and the two-head plasma cutting table (AL) at all times the respective units are in operation.

**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).

| | |
|------------------------|------------------------------|
| Company Name: | Kloeckner Metals Corporation |
| Source Address: | 8301 East 33rd Street |
| City: | Indianapolis, Indiana 46226 |
| Phone #: | (317) 964-2612 |
| MSOP #: | M097-43475-00869 |

I hereby certify that Kloeckner Metals Corporation is:

still in operation.

no longer in operation.

I hereby certify that Kloeckner Metals Corporation is:

in compliance with the requirements of MSOP M097-43475-00869.

not in compliance with the requirements of MSOP M097-43475-00869.

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

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

| |
|-----------------------|
| Noncompliance: |
| |
| |
| |

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Mail to: Permit Administration and Support Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

KloECKner Metals Corporation
8301 East 33rd Street
Indianapolis, Indiana 46226

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that KloECKner Metals Corporation, 8301 East 33rd Street, Indianapolis, Indiana 46226, has constructed and will operate a metalworking facility that processes a variety of metal products, including but not limited to structural beams and tubing, channels, angles, pipes, bars, flats, plates, sheet products, grating, expanded metal, and flooring products. on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on November 15, 2020 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M097-43475-00869, Plant ID No. 097-00869 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

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

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

Source Description and Location

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

Existing Approvals

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.

County Attainment Status

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 ₂ | Attainment effective May 21, 2020, for the 2010 SO ₂ 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 ₃ | Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard. |
| PM _{2.5} | Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard. |
| PM _{2.5} | Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard. |
| PM ₁₀ | Unclassifiable effective November 15, 1990. |
| NO ₂ | Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ 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_x) 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_x 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_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
mARION County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x 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) 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 ¹ | PM ₁₀ ¹ | PM _{2.5} ^{1,2} | SO ₂ | NO _x | VOC | CO | Total HAPs |
| Total PTE of Entire Source Excluding Fugitives* | 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 |
| Total PTE of Entire Source Including Source-Wide Fugitives* | 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 |

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
 *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 ₁₀ | PM _{2.5} ¹ | SO ₂ | NO _x | VOC | CO | Single HAP ² | Total HAPs |
| Manual Welding Machines | 0.22 | 0.22 | 0.22 | - | - | - | - | 0.01 | 0.01 |
| Total PTE Before Controls of the New Emission Units: | 0.22 | 0.22 | 0.22 | - | - | - | - | 0.01 | 0.01 |

¹PM_{2.5} listed is direct PM_{2.5}.
²Single 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 ¹ | PM ₁₀ ¹ | PM _{2.5} ^{1,2} | SO ₂ | NO _x | VOC | CO | Total HAPs |
| Total PTE of Entire Source Excluding Fugitive Emissions* | 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 |
| Total PTE of Entire Source Including Source-Wide Fugitives* | 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 | -- |

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
 *Fugitive HAP emissions are always included in the source-wide emissions.

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.

| |
|---|
| State Rule Applicability – Individual Facilities |
|---|

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 ~~strike through~~ 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-slagging 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.

| |
|---------------------|
| IDEM Contact |
|---------------------|

- (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 IGCM 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/>.

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-47953-00869
Reviewer: Maddison Hite

| Uncontrolled Potential to Emit (tons/yr) | | | | | | | | |
|--|--------------|--------------|--------------|-----------------|--------------|--------------|-------------|--------------|
| Emissions Unit | PM | PM10 | PM2.5 * | SO ₂ | NOx | VOC | CO | Total HAPs** |
| Metal Cutting | 64.62 | 64.62 | 64.62 | 0.02 | 9.51 | - | - | 1.83 |
| Natural Gas Combustion | 0.04 | 0.16 | 0.16 | 0.01 | 2.16 | 0.12 | 1.82 | 0.04 |
| Welding and Thermal Cutting | 14.34 | 14.34 | 14.34 | - | - | - | - | 3.88 |
| Shearing | 0.08 | 0.08 | 0.08 | - | - | - | - | - |
| Spray Paints | - | - | - | - | - | 1.85 | - | 3.03E-05 |
| Saw Coolant | - | - | - | - | - | 14.76 | - | - |
| De-Slagger Machine | 0.14 | 0.14 | 0.14 | - | - | - | - | - |
| Total Excluding Fugitives | 79.22 | 79.34 | 79.34 | 0.03 | 11.68 | 16.73 | 1.82 | 5.75 |
| Fugitive Emissions Unpaved Roads | 6.32 | 1.69 | 0.17 | - | - | - | - | - |
| Total Including Fugitives | 85.54 | 81.03 | 79.51 | 0.03 | 11.68 | 16.73 | 1.82 | 5.75 |

Source-Wide Total HAPs: 5.75

* PM2.5 listed is direct PM2.5

**Fugitive HAP emissions are always included in the source-wide emissions

**Appendix A: Emissions Calculations
Administrative Amendment**

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-47953-00869
Reviewer: Maddison Hite

| Uncontrolled Potential to Emit of New and Modified Units (tons/year) | | | | | | | | | |
|--|-------------|------------------|---------------------|-----------------|-----------------|-------------|-------------|---------------|-----------------|
| Emission Unit | PM | PM ₁₀ | PM _{2.5} * | SO ₂ | NO _x | VOC | CO | Combined HAPs | Single HAP (Mn) |
| New Units | | | | | | | | | |
| Manual Welding Machines | 0.22 | 0.22 | 0.22 | - | - | - | - | 0.01 | 0.01 |
| <i>PTE of New Units</i> | <i>0.22</i> | <i>0.22</i> | <i>0.22</i> | <i>0.00</i> | <i>0.00</i> | <i>0.00</i> | <i>0.00</i> | <i>0.01</i> | <i>0.01</i> |

*PM_{2.5} listed is direct PM_{2.5}

**Appendix A: Emission Calculations
Potential to Emit Particulate, Nox, and HAPs
Metal Cutting**

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-47953-00869
Reviewer: Maddison Hite

Materials Composition¹

| Materials | Grade | % Stock | %S as SO2 | %Mn | %Ni | %Cr | %P |
|--------------------------------|------------------------|--------------|--------------|--------------|--------------|--------------|--------------|
| Carbon Steel plate | A36 | 50.8% | 0.03% | 1.20% | - | - | 0.03% |
| Carbon Steel plate | A572-50 | 23.7% | 0.03% | 1.35% | - | - | 0.03% |
| Carbon Steel plate | ASTM A588 | | | | | | |
| Carbon Steel plate | A/B/A709-50W | 5.4% | 0.006% | 1.35% | 0.40% | 0.70% | 0.02% |
| Carbon Steel plate | ASTM A514 | 3.8% | 0.03% | 1.00% | - | 0.65% | 0.03% |
| Abrasion Resistant Steel Plate | ABRASION RESISTANT 400 | 2.8% | 0.01% | 1.60% | 0.50% | 0.50% | 0.025% |
| | | 86.5% | 0.03% | 1.60% | 0.50% | 0.70% | 0.03% |

Notes:
¹ From supplier information.

Plasma/Oxyfuel Torches Cutting Potential Particulate/HAP Emissions

| Model No. | Machine Name | Source | Quantity | Max. Actual Metal Removed ⁴ (lb/yr) | Max. Actual Linear Inches Cut (in/yr) | Potential Metal Removed ⁴ | | Potential Linear Inches Cut ³ | | Cutting Technique | Fume Generation ⁴ (% or g/in) | Control Efficiency (%) | Density of Nox ¹ | | Nox Volume Emission Rate ² | |
|-------------------|--------------------|-----------------|----------|--|---------------------------------------|--------------------------------------|---------|--|---------|-------------------|--|------------------------|-----------------------------|-------|---------------------------------------|-------|
| | | | | | | (lb/yr) | (lb/hr) | (in/yr) | (in/hr) | | | | g/m3 | lb/m3 | l/min | m3/hr |
| Altra PG30-21 | AL | plasma | 2 | 306,396 | - | 612,792 | 70 | | | Dry | 7% | 90% | 1320.74 | 2.91 | 2.3 | 0.14 |
| Sector Technology | ST | plasma | 1 | 306,396 | - | 612,792 | 70 | | | Dry | 7% | 90% | 1320.74 | 2.91 | 2.3 | 0.14 |
| Sector Technology | ST | oxyfuel torches | 4 | 1,660,266.00 | | | | 3,320,532.00 | 380.36 | Semi-dry | 0.037 | 90% | 1363.95 | 3.01 | 0.11 | 0.01 |
| Sector Technology | MK | plasma | 1 | 306,396 | - | 612,792 | 70 | | | Dry | 7% | 90% | 1320.74 | 2.91 | 2.3 | 0.14 |
| Sector Technology | MK | oxyfuel torches | 4 | 1,660,266.00 | | | | 3,320,532.00 | 380.36 | Semi-dry | 0.037 | 90% | 1363.95 | 3.01 | 0.11 | 0.01 |
| | Hand Plasma Cutter | plasma | 1 | 100 | - | 100 | 0.01 | | | Dry | 7% | - | 1320.74 | 2.91 | 2.3 | 0.14 |

Notes:

- Density calculated using ideal gas law at NTP, with average break up of NO₂/NO, ratio from "Best Practice Document on Exposure to Nitrogen Oxides in Welding" International Institute of Welding, Dr.-Ing Spiegel-Clobanu & Dr. med. Wolfgang Zschiesche. Density = P/RT = 101.325 Pa / (8.314 m³Pa/Kmol * 293.15 K) * (89%*30.01 g/mol +11%*46.0 g/mol) for Plasma cutting
Density = P/RT = 101.325 Pa / (8.314 m³Pa/Kmol * 293.15 K) * (82.5%*30.01 g/mol +17.5%*46.0 g/mol) for flame cutting
- Volume emission rates from "Best Practice Document on Exposure to Nitrogen Oxides in Welding" International Institute of Welding, Dr.-Ing Spiegel-Clobanu & Dr. med. Wolfgang Zschiesche
Flame cutting used for oxyfuel torches and plasma cutting used for plasma cutters. Average values used. Flame cutting: (25-200)/2 and Plasma Cutting (conventional): (600-4000)/2
Growth Factor - Operational Hrs = 1.0 [Based on potential operational hrs, 8760]
- Growth Factor - Productivity/Process Improvement = 2.0 [Based on potential productivity increases and/or process improvements]
- The metal cutting values are determined by scaling up actual metal cut values and adding a robust factor of safety. The source used June 2019 actual data since this was their highest month for that year. In addition, the source included a factor of safety of "2" to account for any productivity increases of process improvements.

| Model No. | Machine Name | Uncontrolled | | | | | | | | | Controlled | | | | | | | | |
|-------------------|--------------------|-----------------------|------------------------|---------------|--------------|-------------|-------------|-------------|-------------|-----------------------|-----------------------|------------------------|--------------|-------------------|-------------|-------------|-------------|-------------|-----------------------|
| | | PM/PM10/PM2.5 (lb/yr) | PM/PM10/PM2.5 (ton/yr) | Nox (tons/yr) | SO2 (ton/yr) | Mn (ton/yr) | Ni (ton/yr) | Cr (ton/yr) | P (ton/yr) | Combined HAP (ton/yr) | PM/PM10/PM2.5 (lb/yr) | PM/PM10/PM2.5 (ton/yr) | Nox (ton/yr) | S as SO2 (ton/yr) | Mn (ton/yr) | Ni (ton/yr) | Cr (ton/yr) | P (ton/yr) | Combined HAP (ton/yr) |
| Altra PG30-21 | AL | 4.90 | 21.45 | 3.52 | 0.01 | 0.343 | 0.11 | 0.15 | 6.43E-03 | 0.61 | 0.49 | 2.14 | - | 6.43E-04 | 3.43E-02 | 1.07E-02 | 1.50E-02 | 6.43E-04 | 6.07E-02 |
| Sector Technology | ST | 4.93 | 21.58 | 2.12 | 6.47E-03 | 0.345 | 0.11 | 0.151 | 6.47E-03 | 6.11E-01 | 4.93E-01 | 2.16 | - | 6.47E-04 | 3.45E-02 | 1.08E-02 | 1.51E-02 | 6.47E-04 | 6.11E-02 |
| Sector Technology | MK | 4.93 | 21.58 | 2.12 | 6.47E-03 | 0.345 | 0.11 | 0.151 | 6.47E-03 | 6.11E-01 | 4.93E-01 | 2.16 | - | 6.47E-04 | 3.45E-02 | 1.08E-02 | 1.51E-02 | 6.47E-04 | 6.11E-02 |
| | Hand Plasma Cutter | 7.99E-04 | 3.50E-03 | 1.76 | 1.05E-06 | 5.60E-05 | 1.75E-05 | 2.45E-05 | 1.05E-06 | 9.91E-05 | - | - | - | - | - | - | - | - | - |
| | Total | 14.75 | 64.62 | 9.51 | 0.02 | 1.03 | 0.32 | 0.45 | 0.02 | 1.83 | 1.48 | 6.46 | 0.00 | 0.00 | 0.10 | 0.03 | 0.05 | 0.00 | 0.18 |

Methodology:

Max. Actual Metal Removed (lb/yr) = Metal thickness (in) x Kerf (in) x Length (in) x Metal Density (lb/in³)
The above is based on maximum metal removed per source type from the highest operating month of 2019 (June 2019 as provided by the source on May 18, 2020)
Potential Metal Removed (lb/yr) = Max. Actual Metal Removed (lb/yr) x Growth Factor (Operational Hours) x Growth Fractor (Productivity/Process Improvement)
Potential Linear Inches Cut (in/yr) = Max. Actual Linear Inches Cut (lb/yr) x Growth Factor (Operational Hours) x Growth Fractor (Productivity/Process Improvement)
Uncontrolled Particulate (ton/yr) for AL = Potential Metal Removed (lb/yr) Fume Generation (%) x 1/2000lbs
Uncontrolled Particulate (lb/hr) for AL = Uncontrolled Particulate (ton/yr) for AL x 2000lbs/8760 hrs
Uncontrolled Particulate (ton/yr) for ST and MK = Potential Linear Inches Cut (in/yr) x Fume Generation (g/in) x 0.0022 (lb/g) x 1ton/2000lb
Uncontrolled Particulate (lb/hr) for ST and MK = Uncontrolled Particulate (ton/yr) for ST and MK x 2000lbs/8760 hrs
Uncontrolled Nox (ton/yr) = Density of Nox (lb/m³) x Nox Volume Emission Rate (m³/hr) x 8760hours/2000lbs x Quantity
Uncontrolled SO₂ (ton/yr) = Uncontrolled Potential to Emit Particulate (ton/yr) x Max % SO₂
Uncontrolled Mn (ton/yr) = Uncontrolled Potential to Emit Particulate (ton/yr) x Max % Mn
Uncontrolled Ni (ton/yr) = Uncontrolled Potential to Emit Particulate (ton/yr) x Max % Ni
Uncontrolled Cr (ton/yr) = Uncontrolled Potential to Emit Particulate (ton/yr) x Max % Cr
Uncontrolled P (ton/yr) = Uncontrolled Potential to Emit Particulate (ton/yr) x Max % P
Uncontrolled Combined HAP emissions (ton/yr) = Summation of MN + Ni + Cr + P
Iron (Fe), Carbon (C), Copper (Cu), Silicon (Si), and Molybdenum (Mo) are not pollutants that are regulated by U.S. EPA or the state therefore they are not considered in the Potential to Emit.

Controlled Particulate (ton/yr) for AL = Uncontrolled Particulate (ton/yr) for AL x (1-Control Efficiency %)
Controlled Particulate (lb/hr) for AL = Uncontrolled Particulate (lb/hr) for AL x (1-Control Efficiency %)
Controlled Particulate (ton/yr) for ST and MK = Uncontrolled Particulate (ton/yr) for ST and MK x (1 - Control Efficiency %)
Controlled Particulate (lb/hr) for ST and MK = Uncontrolled Particulate (lb/hr) for ST and MK x (1-Control Efficiency %)
Controlled Nox (ton/yr) = Not Applicable
Controlled SO₂ (ton/yr) = Uncontrolled Potential to Emit SO₂ (ton/yr) x (1 - Control Efficiency %)
Controlled Mn (ton/yr) = Uncontrolled Potential to Emit Mn (ton/yr) x (1 - Control Efficiency %)
Controlled Ni (ton/yr) = Uncontrolled Potential to Emit Ni (ton/yr) x (1 - Control Efficiency %)
Controlled Cr (ton/yr) = Uncontrolled Potential to Emit Cr (ton/yr) x (1 - Control Efficiency %)
Controlled P (ton/yr) = Uncontrolled Potential to Emit P (ton/yr) x (1 - Control Efficiency %)
Controlled Combined HAP emissions (ton/yr) = Summation of MN + Ni + Cr + P

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-47953-00869
Reviewer: Maddison Hite

| Emission Unit Process | Amount | Heat Input Capacity (MMBtu/hr) | |
|-----------------------|-----------|--------------------------------|-------------|
| | | per unit | total |
| NG Comfort Heaters | 25 | 0.15 | 3.75 |
| NG Comfort Heaters | 2 | 0.13 | 0.26 |
| NG Comfort Heaters | 1 | 0.1 | 0.1 |
| NG Comfort Heaters | 1 | 0.93 | 0.93 |
| Total | 29 | | 5.04 |

| Heat Input Capacity MMBtu/hr | HHV mmBtu mmscf | Potential Throughput MMCF/yr |
|---------------------------------|-----------------------|---------------------------------|
| 5.0 | 1020 | 43.3 |

| Emission Factor in lb/MMCF | Pollutant | | | | | | |
|-------------------------------|-----------|-------|---------------|------|-------------|------|------|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 7.6 | 0.6 | 100 | 5.5 | 84 |
| Potential Emission in tons/yr | 0.04 | 0.16 | 0.16 | 0.01 | **see below | 2.16 | 1.82 |

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

| | HAPs - Organics | | | | | Total - Organics |
|-------------------------------|-----------------|-----------------|--------------|---------|---------|------------------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene | |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 | |
| Potential Emission in tons/yr | 4.5E-05 | 2.6E-05 | 1.6E-03 | 0.04 | 7.4E-05 | 0.04 |

| | HAPs - Metals | | | | | Total - Metals |
|-------------------------------|---------------|---------|----------|-----------|-------------------|----------------|
| | Lead | Cadmium | Chromium | Manganese | Nickel | |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 | |
| Potential Emission in tons/yr | 1.1E-05 | 2.4E-05 | 3.0E-05 | 8.2E-06 | 4.5E-05 | 1.2E-04 |
| | | | | | Total HAPs | 0.04 |
| | | | | | Worst HAP | 0.04 |

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.

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

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-47953-00869
Reviewer: Maddison Hite

| 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 | Cr (VI) | Pb | PM/PM10/PM2.5 | Mn | Ni | Cr | Cr (VI) | Pb | | |
| Welding | | | | | | | | | | | | | | | | | |
| Submerged Arc (total) | 3 | 24.0 | 575.76 | 0.036 | 0.011 | | | | | | 2.59 | 0.792 | 0 | 0 | 0 | 0 | 0.792 |
| Manual Welding Machines (Weld Wire) (total) | 20 | 4.73 | 113.52 | 0.0052 | 3.18E-04 | | | | | | 0.49 | 3.0E-02 | 0 | 0 | 0 | 0 | 0.03 |
| New Manual Welding Machines (Weld Wire) | 2 | 4.73 | 113.52 | 0.0052 | 3.18E-04 | | | | | | 0.05 | 3.0E-03 | 0 | 0 | 0 | 0 | 0.00 |
| Manual Stud Welding Station | 2 | 4.73 | 113.52 | 0.0151 | 0.0022 | 0.0002 | 0.0025 | 0.0019 | 2.40E-05 | | 0.14 | 0.021 | 0.002 | 0.024 | 0.018 | 2.27E-04 | 0.06 |
| Stick (E7018 electrode) | | | 0 | 0.0211 | 0.0009 | | | | | | 0.00 | 0.0E+00 | 0 | 0 | 0 | 0 | 0.00 |
| Tungsten Inert Gas (TIG)(carbon steel) | | | 0 | 0.0055 | 0.0005 | | | | | | 0.00 | 0.0E+00 | 0 | 0 | 0 | 0 | 0.00 |
| Oxycetylene(carbon steel) | | | 0 | 0.0055 | 0.0005 | | | | | | 0.00 | 0.0E+00 | 0 | 0 | 0 | 0 | 0.00 |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| 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 | Cr (VI) | Pb | PM/PM10/PM2.5 | Mn | Ni | Cr | Cr (VI) | Pb | |
| Oxycetylene | | | | 0 | 0.1622 | 0.0005 | 0.0001 | 0.0003 | | | 0.000 | 0.0E+00 | 0.0E+00 | 0.0E+00 | 0.0E+00 | 0.0E+00 | 0.000 |
| Oxymethane | | | | 0 | 0.0815 | 0.0002 | | 0.0002 | | | 0.000 | 0.0E+00 | 0.00 | 0.0E+00 | 0.0E+00 | 0.0E+00 | 0.000 |
| Plasma** | | | | 0 | 0.0039 | | | | | | 0.000 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.000 |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| Totals | | | | | | | | | | | | | | | | | |
| Potential to Emit (lbs/hr) | | | | | | | | | | | 3.27 | 0.84 | 0.00 | 0.02 | 0.02 | 0.00 | 0.89 |
| Potential to Emit (lbs/day) | | | | | | | | | | | 78.60 | 20.222 | 4.4E-02 | 0.574 | 0.427 | 0.005 | 21.273 |
| Potential to Emit (tons/year) | | | | | | | | | | | 14.34 | 3.7E+00 | 8.1E-03 | 1.0E-01 | 7.8E-02 | 9.9E-04 | 3.88 |
| New Manual Welding Machines (Weld Wire) (tons/year) | | | | | | | | | | | 0.22 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 |

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)

Assume PM10 = PM = PM2.5.

**Appendix A: Emission Calculations
Metal Shearing**

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-47953-00869
Reviewer: Maddison Hite

| Process Description | Number of Drop Points | Emission Factors | | Uncontrolled Potential to Emit | |
|---------------------|-----------------------|-------------------------|----------------------------|--------------------------------|--------|
| | | Throughput ¹ | PM/PM10/PM2.5 ² | PM/PM10/PM2.5 | |
| | | ton/hr | lb/ton | lb/hr | ton/yr |
| Shears | 6 | 1 | 0.003 | 0.018 | 0.08 |
| Total | 6 | 1 | 0.003 | 0.018 | 0.08 |

Notes:

¹ Provided by the source.

² Emission factor provided by Versar Inc. Title V Applicability Workbook Institute of Scrap Recycling Industries Inc. (February 15, 1996), Table D-10.F Emission Test for Mill Defumer w/no Controls

Methodology:

Uncontrolled PTE of PM (lb/hr) = Number of Drop Points x Throughput (ton/hr) x PM Emission Factor (lb/ton)

Uncontrolled PTE of PM (ton/yr) = Uncontrolled PTE of PM (lb/hr) x 8760hr/1yr x 1ton/2000lbs

**Appendix A: Emission Calculations
Potential to Emit VOC and HAPs from
Spray Paint Operation**

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-47953-00869
Reviewer: Maddison Hite

| ID | Spray Paint | Density lb/gal | Actual Usage ounces/year | Actual Usage | | Max. Usage | | VOC Wt % | VOC Potential to Emit | |
|--------------|-------------|----------------|--------------------------|--------------|----------|-------------|----------|----------|-----------------------|-------------|
| | | | | gal/hr | lb/hr | gal/hr | lb/hr | | lb/hr | tons/yr |
| 1 | Flat Black | 5.97144 | 280 | 0.001 | 0.006 | 0.004 | 0.026 | 100% | 0.026 | 0.12 |
| 2 | Orange | 5.838 | 210 | 0.001 | 0.005 | 0.003 | 0.019 | 100% | 0.019 | 0.08 |
| 3 | Gold | 6.255 | 130 | 4.88E-04 | 3.05E-03 | 2.05E-03 | 1.28E-02 | 100% | 0.013 | 5.62E-02 |
| 4 | Green | 5.7546 | 460 | 0.002 | 0.010 | 0.007 | 0.042 | 100% | 0.042 | 0.18 |
| 5 | Gloss Pink | 6.0882 | 30 | 0.000 | 0.001 | 0.000 | 0.003 | 100% | 0.003 | 0.01 |
| 6 | Yellow | 5.9214 | 830 | 0.003 | 0.018 | 0.013 | 0.078 | 100% | 0.078 | 0.34 |
| 7 | Gloss Red | 5.838 | 990 | 0.004 | 0.022 | 0.016 | 0.091 | 100% | 0.091 | 0.40 |
| 8 | Blue | 5.838 | 770 | 0.003 | 0.017 | 0.012 | 0.071 | 100% | 0.071 | 0.31 |
| 9 | Gloss White | 6.0048 | 740 | 0.003 | 0.017 | 0.012 | 0.070 | 100% | 0.070 | 0.31 |
| 10 | Osha Purple | 6.1716 | 100 | 3.76E-04 | 0.002 | 0.002 | 0.010 | 100% | 0.010 | 0.04 |
| Total | | | | | | 0.07 | | | 0.42 | 1.85 |

Safety Factor = 4.2

Actual 2019 usage based off of 2,080 hours per year.

Max Usage calculated scaling up to 8760.

Methodology:

Max. Usage (oz/yr) = Actual Usage (oz/yr) x Safety Factor

Max. Usage (lb/yr) = Actual Usage (lb/yr) x Safety Factor

| ID | Xylene % Weight | Ethylbenzene % Weight | Toluene % Weight | Cumene % Weight | Xylene | | Ethylbenzene | | Toluene | | Cumene | |
|--------------|-----------------|-----------------------|------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| | | | | | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr |
| 1 | 2.3% | 0.60% | - | - | 6.93E-08 | 3.03E-07 | 1.81E-08 | 7.91E-08 | - | - | - | - |
| 2 | - | - | 11.70% | 0.20% | - | - | - | - | 2.58E-07 | 1.13E-06 | 4.42E-09 | 1.93E-08 |
| 3 | - | - | 37.80% | - | - | - | - | - | 5.54E-07 | 2.42E-06 | - | - |
| 4 | - | - | 13.40% | 0.10% | - | - | - | - | 6.39E-07 | 2.80E-06 | 4.77E-09 | 2.09E-08 |
| 5 | - | - | 15.40% | - | - | - | - | - | 5.07E-08 | 2.22E-07 | - | - |
| 6 | - | - | 13.70% | 0.20% | - | - | - | - | 1.21E-06 | 5.31E-06 | 1.77E-08 | 7.75E-08 |
| 7 | - | - | 12.90% | 0.20% | - | - | - | - | 1.34E-06 | 5.88E-06 | 2.08E-08 | 9.12E-08 |
| 8 | - | 0.10% | 13.30% | 0.10% | - | - | 8.10E-09 | 3.55E-08 | 1.08E-06 | 4.72E-06 | 8.10E-09 | 3.55E-08 |
| 9 | - | - | 17.20% | - | - | - | - | - | 1.38E-06 | 6.03E-06 | - | - |
| 10 | - | - | 22.90% | - | - | - | - | - | 2.55E-07 | 1.11E-06 | - | - |
| Total | | | | | 6.93E-08 | 3.03E-07 | 2.62E-08 | 1.15E-07 | 6.76E-06 | 2.96E-05 | 5.58E-08 | 2.44E-07 |

| | |
|-----------------------------|------------------------|
| Combined HAP = | 3.03E-05 ton/yr |
| Single Highest HAP = | 2.96E-05 ton/yr |

Toluene

Methodology:

HAP lb/hr = Max. Usage lb/yr x HAP % Weight / 8760 hours

HAP ton/yr = HAP lb/hr x 8760 hours/2000 lbs

Combined HAP ton/yr = Summation of all HAPs (ton/yr)

Appendix A: Emission Calculations**Potential to Emit VOC from****Saw Coolant**

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-47953-00869
Reviewer: Maddison Hite

| Material | Density lb/gal | Actual Usage gal/yr | Actual Usage ¹ gal/hr | Max Usage gal/hr | VOC Wt % | Potential to Emit VOC | |
|----------|-------------------|---------------------------|--|---------------------|----------|-----------------------|--------|
| | | | | | | lb/hr | ton/yr |
| Band Ade | 8.43 | 550 | 0.26 | 1.11 | 36% | 3.37 | 14.76 |

Safety Factor = 4.2

Actual usage based off of 2,080 hours per year.

Safety Factor = 8760/2080

Per the SDS, this material has no HAPs.

¹ Actual usage is based off the sources 2019 data of 550 gallons per year, the source only operates 2080 hours per year (8 hours, 5 days/wk, for 52 weeks per year)

Methodology:

Actual Usage (gal/hr) = Actual Usage provided by source of 550 gallons per year x 1yr/2080 hours

Max. Usage (gal/hr) = Actual Usage (gal/hr) x Safety Factor

Potential to Emit (lb/hr) = Density (lb/gal) x Max Usage (gal/hr) x VOC Wt%

Potential to Emit (ton/yr) = Potential to Emit (lb/hr) x 8760hrs/1yr x 1ton/2000lbs

Appendix A: Emission Calculations

PTE for De-slagger

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-47953-00869
Reviewer: Maddison Hite

| Emission Unit | Max Capacity (tons/hr) | PM/PM ₁₀ /PM _{2.5} Emission Factor ^{1,2} (lb/ton) | PM/PM ₁₀ /PM _{2.5} Emissions (lb/hr) | PM/PM ₁₀ /PM _{2.5} Emissions (ton/yr) |
|--------------------|---------------------------|--|--|---|
| De-Slagger Machine | 1 | 3.20E-02 | 0.03 | 0.14 |

Total: 0.14

Notes

¹ Emission factor for metal cutting stations based on the PM/PM10 Emission Factors from WebFire, SCC 3-04-004-60 (Castings Finishing)

PM/PM10/PM2.5 Emission factor is based off uncontrolled values.

² Assume PM₁₀ = PM_{2.5}

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-47953-00869
Reviewer: Maddison Hite

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

| Type | Maximum number of vehicles | Number of one-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight of Loaded Vehicle (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) |
|--------------------------------|----------------------------|---|----------------------------------|--|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Semi Trucks Unloading Inbound | 10.0 | 1.0 | 10.0 | 40.0 | 400.0 | 1003 | 0.190 | 1.9 | 693.4 |
| Semi Trucks Unloading Outbound | 10.0 | 1.0 | 10.0 | 20.0 | 200.0 | 686 | 0.130 | 1.3 | 474.2 |
| Semi Trucks Loading Inbound | 12.0 | 1.0 | 12.0 | 20.0 | 240.0 | 792 | 0.150 | 1.8 | 657.0 |
| Semi Trucks Loading Outbound | 12.0 | 1.0 | 12.0 | 40.0 | 480.0 | 528 | 0.100 | 1.2 | 438.0 |
| Totals | | | 44.0 | | 1320.0 | | | 6.2 | 2262.6 |

Average Vehicle Weight Per Trip = tons/trip
 Average Miles Per Trip = miles/trip

Unmitigated Emission Factor, $E_f = k * [(s/12)^a] * [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

| | PM | PM10 | PM2.5 | |
|-----------|------|------|-------|---|
| where k = | 4.9 | 1.5 | 0.15 | lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads) |
| s = | 6.0 | 6.0 | 6.0 | % = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production) |
| a = | 0.7 | 0.9 | 0.9 | = constant (AP-42 Table 13.2.2-2 for Industrial Roads) |
| W = | 30.0 | 30.0 | 30.0 | tons = average vehicle weight |
| b = | 0.45 | 0.45 | 0.45 | = constant (AP-42 Table 13.2.2-2 for Industrial Roads) |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$
 where P = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

| | PM | PM10 | PM2.5 | |
|--|------|------|-------|---------|
| Unmitigated Emission Factor, E_f = | 8.50 | 2.27 | 0.23 | lb/mile |
| Mitigated Emission Factor, E_{ext} = | 5.59 | 1.49 | 0.15 | 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) |
|--------------------------------|--|--|---|
| Semi Trucks Unloading Inbound | 1.94 | 0.52 | 0.05 |
| Semi Trucks Unloading Outbound | 1.33 | 0.35 | 0.04 |
| Semi Trucks Loading Inbound | 1.84 | 0.49 | 0.05 |
| Semi Trucks Loading Outbound | 1.22 | 0.33 | 0.03 |
| Totals | 6.32 | 1.69 | 0.17 |

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (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)]
 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 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Damian Kline
Kloeckner Metals Corporation
8301 E 33rd St
Indianapolis, IN 46226

DATE: July 2, 2024

FROM: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
MSOP Administrative Amendment
097-47953-00869

This notice is to inform you that a final decision has been issued for the air permit application referenced above.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. In addition, the Notice of Decision has been sent to the OAQ Permits Branch Interested Parties List and, if applicable, the Consultant/Agent and/or Responsible Official/Authorized Individual.

The final decision and supporting materials are available electronically; the original signature page is enclosed for your convenience. The final decision and supporting materials available electronically at:

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option **by Permit Number**, then enter permit 47953

and

IDEM's Virtual File Cabinet (VFC): <https://www.in.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, or have difficulty accessing the documents online, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover Letter 8/20/20-acces via website



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 2, 2024
Kloeckner Metals Corporation
097-47953-00869

To: Interested Parties

This notice is to inform you that a final decision has been issued for the air permit application referenced above. This notice is for informational purposes only. You are not required to take any action.

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity.

The enclosed Notice of Decision Letter provides additional information about the final permit decision.

The final decision and supporting materials are available electronically at:

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option by Permit Number, then enter permit 47953

and


IDEM's Virtual File Cabinet (VFC): <https://www.in.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit.

Please Note: *If you would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
Final Interested Parties Cover Letter 10/13/2023

Mail Code 61-53

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|----------------------------|---|---|---|--|
| IDEM Staff | LGAINES 7/2/2024 Kloeckner Metals Corporation 097-47953-00869 (final) | | Type of Mail: CERTIFICATE OF MAILING ONLY | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
| Name and address of Sender |  | Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204 | | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee | Remarks |
|------|----------------|---|---------|-----------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|---------|
| 1 | | Damian Kline Kloeckner Metals Corporation 8301 E 33rd St Indianapolis IN 46226 (Source CAATS) VIA UPS | | | | | | | | | | |
| 2 | | Bart Clifford Chief Operating Officer (COO) Kloeckner Metals Corporation 500 Colonial Center Pkwy Ste 500 Roswell GA 30076 (RO CAATS) | | | | | | | | | | |
| 3 | | Planning Div., Dept. of Metropolitan Development 200 E Washington St Rm 2042 Indianapolis IN 46204 (Local Official) | | | | | | | | | | |
| 4 | | National Chemsearch Corporation 8401 E 33rd St Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |
| 5 | | Crossroads Rehabilitation Center Inc. 8302 E 33rd St Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |
| 6 | | Hoosier Freight and Warehouse 3333 N Franklin Rd Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |
| 7 | | Thomson Logistics Assets LLC 3333 N Pagosa Ct Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |
| 8 | | GFN NC 1 LLC/Brennan Management LLC 3316 N Pagosa Ct Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |
| 9 | | Abrasive Products LLC 3131 N Franklin Rd, Ste D Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |
| 10 | | Kelley Brothers Hardware Corporation 3131 N Franklin Rd, Ste B Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |
| 11 | | Total Plastics International 3316 Pagosa Ct Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |
| 12 | | Worldwide Filters LLC 3318 Pagosa Ct Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |
| 13 | | Cavalier Distributing 3332 Paqosa Ct Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |
| 14 | | LKQ 8424 E 33rd St Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |
| 15 | | MS Logistics 3333 Pagosa Ct Indianapolis IN 46226 (Affected Party) | | | | | | | | | | |

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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
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Mail Code 61-53

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|----------------------------|--|---|---|--|
| IDEM Staff | LGAINES 7/2/2024 Kloeckner Metals Corporation 097-47953-00869 (final) pg2 | | | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
| Name and address of Sender | ▶ | Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204 | Type of Mail: CERTIFICATE OF MAILING ONLY | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee |
|------|----------------|--|---------|-----------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|
| | | | | | | | | | | | Remarks |
| 1 | | Marion County Health Department 3838 N Rural St Indianapolis IN 46205 (Health Department) | | | | | | | | | |
| 2 | | Wayne Township Trustee 5401 W Washington St Indianapolis IN 46241 (Local Official) | | | | | | | | | |
| 3 | | Geoffrey Bright Trinity Consultants 8900 Keystone Crossing Ste 1070 Indianapolis IN 46240 (Consultant) | | | | | | | | | |
| 4 | | Indianapolis City Council and Mayors office 200 E Washington St, City-County Bldg, Ste 2501 Indianapolis IN 46204 (Local Official) | | | | | | | | | |
| 5 | | Marion County Commissioners 200 E Washington St, City-County Bldg, Ste 801 Indianapolis IN 46204 (Local Official) | | | | | | | | | |
| 6 | | Office of Sustainability, Marion County City-County Bldg, 200 E Washington St, Rm 2460 Indianapolis IN 46204 (Local Official) | | | | | | | | | |
| 7 | | Citadel 3131-A N Franklin Rd Indianapolis IN 46226 (Affected Party) | | | | | | | | | |
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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
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