NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Minor Source Operating Permit (MSOP)

for INOX Market North America in Delaware County

MSOP No.: M035-43339-00113

The Indiana Department of Environmental Management (IDEM) has received an application from INOX Market North America, located at 4400 S. Cowan Rd., Muncie, IN 47302, for a new source construction and MSOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow INOX Market North America to construct and operate a new steel cutting, polishing, and coating facility.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM’s preliminary findings have been sent to:

Muncie Public Library
2005 S. High St.
Muncie, IN 47302

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: http://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.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you
do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M 035-43339-00113 in all correspondence.

Comments should be sent to:

James Sperl
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for James Sperl or (317) 232-0459
Or dial directly: (317) 232-0459
Fax: (317) 232-6749 attn: James Sperl
E-mail: jspel@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact James Sperl of my staff at the above address.

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality
New Source Construction and Minor Source Operating Permit

OFFICE OF AIR QUALITY

INOX Market North America
4400 S. Cowan Rd.
Muncie, Indiana 47302

(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.: M035-43339-00113
Master Agency Interest ID:  127418

Issued by:  
Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

Issuance Date:  
Expiration Date:  
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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 steel cutting, polishing, and coating facility.

- Source Address: 4400 S. Cowan Rd., Muncie, Indiana 47302
- General Source Phone Number: 442-153-2900
- SIC Code: 3444 (Sheet Metal Work), 3446 (Architectural and Ornamental Metal Work)
- County Location: Delaware, the portion of the city of Muncie, Indiana bounded to the north by West 26th Street/Hines Road, to the east by Cowan Road, to the south by West Fuson Road, and to the west by a line running south from the eastern edge of Victory Temple’s driveway to South Hoyt Avenue and then along South Hoyt Avenue. Unclassifiable or attainment effective December 31, 2011, for the remainder of the county

- 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) One (1) brushing process, identified as BP-1, approved in 2021 for construction, with a maximum capacity of 20 tons of steel per hour, using baghouse BH-1 as control, and exhausting indoors. BP-1 consists of the following equipment:

  (i) One (1) uncoiler with no emissions;
  (ii) Three (3) brushing heads using abrasive belts;
  (iii) Two (2) polish heads using abrasive rolls; and,
  (iv) One (1) recoiler with no emissions

(b) One (1) brushing process, identified as BP-2, approved in 2021 for construction, with a maximum capacity of 20 tons of steel per hour, using baghouse BH-2 as control, and exhausting indoors. BP-2 consists of the following equipment:

  (i) One (1) sheet loading station with no emissions;
  (ii) Two (2) brushing heads using abrasive belts; and,
  (iii) One (1) sheet unloading station with no emissions

(c) One (1) metal coil cutting operation, identified as MC-1, approved in 2021 for construction, exhausting indoors.
(d) One (1) varnish roll-coating line, identified as VRC-1, approved in 2021 for construction, using rollers to apply varnish to steel sheets with a maximum capacity of 0.70 gallons of varnish per hour, exhausting indoors.

(e) One (1) solvent cleaning process, approved in 2021 for construction, using solvent to clean coating equipment, with a maximum capacity of 0.5 gallons per hour, exhausting indoors.

(f) Three (3) natural gas-fired comfort heating furnaces, identified as H-1, H-2, and H-3, approved in 2021 for construction, with a maximum capacity of 0.95 MMBtu per hour, each, exhausting indoors.

(g) Liquid storage vessels for storing the following types of liquids:

(i) Lubricating oils
(ii) Hydraulic oils
(iii) Machining oils
(iv) Machining fluids

(h) Machining operations where an aqueous cutting coolant continuously floods the machining interface

(i) Brazing, soldering, or welding operations and associated equipment related to routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from these activities would not be associated with any commercial production process
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 proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin 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, M035-43339-00113, 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 M035-43339-00113 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 IG-CN 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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 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.3 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.4 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.5 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.6 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.7 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.
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).

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.8 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.9 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.10 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.11 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.12  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.13  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.14 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.15 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.16 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) One (1) brushing process, identified as BP-1, approved in 2021 for construction, with a maximum capacity of 20 tons of steel per hour, using baghouse BH-1 as control, and exhausting indoors. BP-1 consists of the following equipment:

(i) One (1) uncoiler with no emissions;
(ii) Three (3) brushing heads using abrasive belts;
(iii) Two (2) polish heads using abrasive rolls; and,
(iv) One (1) recoiler with no emissions

(b) One (1) brushing process, identified as BP-2, approved in 2021 for construction, with a maximum capacity of 20 tons of steel per hour, using baghouse BH-2 as control, and exhausting indoors. BP-2 consists of the following equipment:

(i) One (1) sheet loading station with no emissions;
(ii) Two (2) brushing heads using abrasive belts; and,
(iii) One (1) sheet unloading station with no emissions

(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 Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the two brushing processes shall not exceed the limits listed in the table below:

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

\[ E = 4.10 \times P^{0.67} \]

Where \( E \) = rate of emission in pounds per hour; and
\( P \) = process weight rate in tons per hour

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>( P ) (ton/hr)</th>
<th>( E ) (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brushing Process 1 (BP-1)</td>
<td>20</td>
<td>30.51</td>
</tr>
<tr>
<td>Brushing Process 2 (BP-2)</td>
<td>20</td>
<td>30.51</td>
</tr>
</tbody>
</table>

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

A Preventive Maintenance Plan is required for these units and their control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

(d) One (1) varnish roll-coating line, identified as VRC-1, approved in 2021 for construction, using rollers to apply varnish to steel sheets with a maximum capacity of 0.70 gallons of varnish per hour, 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.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-4]**

Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), for the varnish roll-coating line, the Permittee shall not allow the discharge into the atmosphere VOC in excess of 2.6 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

**D.2.2 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.2.3 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.2.4 Record Keeping Requirements**

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.

1. The VOC content of each coating material and solvent used less water.

2. The amount of each coating material and solvent used on monthly basis.

   (A) Records shall include purchase orders, invoices, and safety data sheets (SDS) necessary to verify the type and amount used.

   (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) Three (3) natural gas-fired comfort heating furnaces, identified as H-1, H-2, and H-3, with a maximum capacity of 0.950 MMBtu per hour, each.

(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.3.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to the PM emission limit (Pt) in pounds per MMBtu heat input as specified in the following table:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Pt (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comfort Heater 1, Comfort Heater 2, Comfort Heater 3</td>
<td>H-1, H-2, H-3</td>
<td>0.6</td>
</tr>
</tbody>
</table>

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
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).

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>INOX Market North America</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>4400 S. Cowan Rd.</td>
</tr>
<tr>
<td>City:</td>
<td>Muncie, Indiana 47302</td>
</tr>
<tr>
<td>Phone #:</td>
<td>442-153-2900</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>M035-43339-00113</td>
</tr>
</tbody>
</table>

I hereby certify that INOX Market North America is: □ still in operation. □ no longer in operation.
I hereby certify that INOX Market North America is: □ in compliance with the requirements of MSOP M035-43339-00113. □ not in compliance with the requirements of MSOP M035-43339-00113.

Authorized Individual (typed):
Title: __________________________
Signature: ______________________
Date: __________________________

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 and to qualify for the exemption under 326 IAC 1-6-4.

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 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

PAGE 1 OF 2
Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

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:

________________________________________________________________________
________________________________________________________________________
INOX Market North America
4400 S. Cowan Rd.
Muncie, Indiana 47302

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
   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 INOX Market North America, 4400 S. Cowan Rd., Muncie, Indiana 47302, completed
   construction of the steel cutting, polishing, and coating facility on _______________________ in conformity
   with the requirements and intent of the construction permit application received by the Office of Air Quality on
   September 30, 2020 and as permitted pursuant to New Source Construction Permit and Minor Source
   Operating Permit No. M035-43339-00113, Plant ID No. 035-00113 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 a New Source Construction and Minor Source Operating Permit (MSOP)

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>INOX Market North America</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>4400 S. Cowan Rd., Muncie, IN 47302</td>
</tr>
<tr>
<td>County:</td>
<td>Delaware (Center Township)</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3444 (Sheet Metal Work), 3446 (Architectural and Ornamental Metal Work)</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>M 035-43339-00113</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>James Sperl</td>
</tr>
</tbody>
</table>

On September 30, 2020, the Office of Air Quality (OAQ) received an application from INOX Market North America related to the construction and operation of a new steel cutting, polishing, and coating facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Delaware County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 16, 2016, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2016, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Nonattainment effective December 31, 2010, for a portion of the city of Muncie, Indiana bounded to the north by West 26th Street/Hines Road, to the east by Cowan Road, to the south by West Fuson Road, and to the west by a line running south from the eastern edge of Victory Temple's driveway to South Hoyt Avenue and then along South Hoyt Avenue. Unclassifiable or attainment effective December 31, 2011, for the remainder of the county.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) 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 NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Delaware County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂.₅
Delaware County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOX emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(c) Lead (Pb)
U.S. EPA, in the Federal Register Notice 85 FR 29331 dated May 15, 2020, designated the portion of Delaware County in the City of Muncie bounded by West 26th Street/Hines Road to the north, Cowan Road to the east, West Fuson Road to the south, and South Hoyt Avenue to the west as attainment for the 2008 lead (Pb) standard effective May 15, 2020. A rulemaking for 326 IAC 1-4 is in process to adopt the U.S. EPA’s attainment designation for the 2008 lead (Pb) standard for this portion of Delaware County. The OAQ will rely on the lead nonattainment designation under 326 IAC 1-4 until the rulemaking for 326 IAC 1-4 is effective. Therefore, Pb emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(d) Other Criteria Pollutants
Delaware 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.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by INOX Market North America on September 30, 2020, relating to construction of a steel cutting, polishing, and coating facility. The following is a list of the new emission units and pollution control device(s):

(a) One (1) brushing process, identified as BP-1, approved in 2021 for construction, with a maximum capacity of 20 tons of steel per hour, using baghouse BH-1 as control, and exhausting indoors. BP-1 consists of the following equipment:

(i) One (1) uncoiler with no emissions;
(ii) Three (3) brushing heads using abrasive belts;
(iii) Two (2) polish heads using abrasive rolls; and,
(iv) One (1) recoiler with no emissions

(b) One (1) brushing process, identified as BP-2, approved in 2021 for construction, with a maximum capacity of 20 tons of steel per hour, using baghouse BH-2 as control, and exhausting indoors. BP-2 consists of the following equipment:

(i) One (1) sheet loading station with no emissions;
(ii) Two (2) brushing heads using abrasive belts; and,
(iii) One (1) sheet unloading station with no emissions

(c) One (1) metal coil cutting operation, identified as MC-1, approved in 2021 for construction, exhausting indoors.

(d) One (1) varnish coating line, identified as VRC-1, approved in 2021 for construction, using rollers to apply varnish to steel sheets with a maximum capacity of 0.70 gallons of varnish per hour, exhausting indoors.

(e) One (1) solvent cleaning process, approved in 2021 for construction, using solvent to clean coating equipment, with a maximum capacity of 0.5 gallons per hour, exhausting indoors.

(f) Three (3) natural gas-fired comfort heating furnaces, identified as H-1, H-2, and H-3, approved in 2021 for construction, with a maximum capacity of 0.95 MMBtu per hour, each, exhausting indoors.

(g) Liquid storage vessels for storing the following types of liquids:

(i) Lubricating oils
(ii) Hydraulic oils
(iii) Machining oils
(iv) Machining fluids

(h) Machining operations where an aqueous cutting coolant continuously floods the machining interface

(i) Brazing, soldering, or welding operations and associated equipment related to routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from these activities would not be associated with any commercial production process

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**Enforcement Issues**

There are no pending enforcement actions related to this source.

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**Emission Calculations**

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

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**Permit Level Determination – MSOP**

This table reflects the unrestricted potential emissions of the 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.
### Unrestricted Source-Wide Emissions (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM¹</th>
<th>PM₉₀¹</th>
<th>PM₂.₅¹,²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Including Fugitives*</td>
<td>24.78</td>
<td>3.88</td>
<td>3.10</td>
<td>0.01</td>
<td>1.22</td>
<td>36.60</td>
<td>1.03</td>
<td>8.85</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>100</td>
<td>25</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1) of VOC is less than one hundred (100) tons per year, but equal to or greater than twenty-five (25) tons per year. The potential to emit of all other regulated air pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).

(b) The potential to emit (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an Minor Source Operating Permit (MSOP).

**Federal Rule Applicability Determination**

Federal rule applicability for this source has been reviewed as follows:

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

(a) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT and 326 IAC 12, are not included in the permit for this source, because Subpart TT defines "metal coil surface coating operations" as "an application system used to apply any organic coating to the surface of any continuous metal strip" and although the metal at IMNA is received in coils, it is cut into sheets prior to being coated with varnish.

(b) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE and 326 IAC 12, are not included in the permit for this source, because pursuant to 40 CFR 60.310, the source does not apply surface coating to metal furniture. The source applies varnish to metal sheets.

(c) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS and 326 IAC 12, are not included in the permit for this source, because pursuant to 40 CFR 60.450, this source does not apply surface coating to large appliances. The source applies varnish to metal sheets.

(d) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.
National Emission Standards for Hazardous Air Pollutants (NESHAP):

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Coil, 40 CFR 63, Subpart SSSS and 326 IAC 20-64 are not included in the permit for this source, since this source is not a major source of HAPs.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM and 326 IAC 20-80 are not included in the permit for this source, since pursuant to 40 CFR 63.3881, the source is not a major source of HAPs. The source applies varnish to metal sheets.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Large Appliances, 40 CFR 63, Subpart NNNN and 326 IAC 20-63 are not included in the permit for this source, since pursuant to 40 CFR 63.4081, the source does not apply surface coating to large appliances.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR and 326 IAC 20-78 are not included in the permit for this source, since pursuant to 40 CFR 63.4881, the source does not apply surface coating to metal furniture.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Source Standards for Plating and Polishing Operations, 40 CFR 63, Subpart WWWW is not included in the permit for this source, since pursuant to 40 CFR 63.11504, while the source does perform dry mechanical polishing, it does not perform this operation after plating or thermal spraying as defined in 40 CFR 63.11511.

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX is not included in the permit for this source, since its operations do not fall into one of the nine metal fabrication and finishing source categories, as defined by the rule. IMNA's proposed operations are best classified by SIC code 3444 (Sheet Metal Work) and 3446 (Architectural and Ornamental Metal Work).

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH is not included in the permit for this source, since it does not perform "spray-applied coating operations, as defined by the rule. The coating process at IMNA uses rollers.

(l) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd
County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

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

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

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

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

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

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

<table>
<thead>
<tr>
<th>State Rule Applicability – Individual Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>State rule applicability for this source has been reviewed as follows:</td>
</tr>
</tbody>
</table>

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

\[ Pt = \frac{1.09}{Q^{0.26}} \]

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility’s permit application, except when some lower capacity is contained in the facility’s operation permit; in which case, the capacity specified in the operation.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.
### Indirect Heating Units Which Began Operation After September 21, 1983

<table>
<thead>
<tr>
<th>Facility</th>
<th>Construction Date (Removal Date)</th>
<th>Operating Capacity (MMBtu/hr)</th>
<th>Q (MMBtu/hr)</th>
<th>Calculated Pt (lb/MMBtu)</th>
<th>Particulate Limitation, Pt (lb/MMBtu)</th>
<th>PM PTE based on AP-42 (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comfort Heater 1</td>
<td>2021</td>
<td>0.950</td>
<td>2.85</td>
<td>0.83</td>
<td>0.6</td>
<td>0.0019</td>
</tr>
<tr>
<td>Comfort Heater 2</td>
<td>2021</td>
<td>0.950</td>
<td></td>
<td>0.83</td>
<td>0.6</td>
<td>0.0019</td>
</tr>
<tr>
<td>Comfort Heater 3</td>
<td>2021</td>
<td>0.950</td>
<td></td>
<td>0.83</td>
<td>0.6</td>
<td>0.0019</td>
</tr>
</tbody>
</table>

Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.

Note: Emission units shown in strikethrough were subsequently removed from the source. The effect of removing these units on "Q" is shown in the year the boiler was removed.

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to Brushing Process 1 and Brushing Process 2, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) for Brushing Process 1 and Brushing Process 2 shall not exceed the limits listed in the table below:

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

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

\[ E = 4.10 P^{0.67} \]

where

- \( E \) = rate of emission in pounds per hour and
- \( P \) = process weight rate in tons per hour

#### Summary of Process Weight Rate Limits

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brushing Process 1 (BP-1)</td>
<td>20</td>
<td>30.51</td>
</tr>
<tr>
<td>Brushing Process 2 (BP-2)</td>
<td>20</td>
<td>30.51</td>
</tr>
</tbody>
</table>

Based on calculations, the control equipment is not needed to comply with this limit.

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

The brushing processes, BP-1 and BP-2, are not subject to 326 IAC 326 IAC 7-1.1 because they have a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

### 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The surface coating operation is not subject to the requirements of 326 IAC 8-1-6 because it is regulated by other rules in 326 IAC 8. The facility is subject to the requirements of 326 IAC 8-2-4.

### 326 IAC 8-2-4 (VOC Rules: Coil Coating Operations)

Pursuant to 326 IAC 8-2-1(a)(4), the surface coating operation is subject this rule because the facility applies coating to flat metal sheets or strips that come in rolls or coils, was constructed after July 1, 1990; and the PTE is greater than 15 pounds of VOC per day.
Therefore, the surface coating operation shall not allow the discharge into the atmosphere VOC in excess of 2.6 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

**326 IAC 8-2-6 (VOC Rules: Metal Furniture Coating)**
The surface coating operation is not subject to the requirements of 326 IAC 8-2-6, because it does not apply surface coating to metal furniture.

**326 IAC 8-2-7 (VOC Rules: Large Appliance Coating)**
The surface coating operation is not subject to the requirements of 326 IAC 8-2-7, because it does not apply surface coating to large appliances.

**326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal and Plastic Coating)**
The surface coating operation is not subject to the requirements of 326 IAC 8-2-9, since pursuant 326 IAC 8-2-9(b)(1), this facility is already limited by 326 IAC 8-2-4.

**326 IAC 9-1 (Carbon Monoxide Emission Limits)**
The requirements of 326 IAC 9-1 do not apply to the facility, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

**326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)**
The requirements of 326 IAC 10-3 do not apply to the facility, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

<table>
<thead>
<tr>
<th>Compliance Determination and Monitoring Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) The Compliance Determination Requirements applicable to this source are as follows:</td>
</tr>
<tr>
<td>Compliance with the VOC content and usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.</td>
</tr>
<tr>
<td>(b) There are no Compliance Monitoring Requirements applicable to this source.</td>
</tr>
</tbody>
</table>

**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 September 30, 2020.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 035-43339-00113. The staff recommends to the Commissioner that the New Source Construction and MSOP be approved.
If you have any questions regarding this permit, please contact James Sperl, 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) 232-0459 or (800) 451-6027, and ask for James Sperl or (317) 232-0459.

A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/)

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: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens' Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).
Emission Calculations
Summary of Emissions

Company Name: INOX Market North America (IMNA)
Address: 4400 S. Cowan Road, Muncie, Indiana 47302
Permit Number: 035-43339-00113
Reviewer: James Sperl

<table>
<thead>
<tr>
<th>Process</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAP</th>
<th>Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brushing / Polishing</td>
<td>19.62</td>
<td>2.76</td>
<td>2.76</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>8.83</td>
<td>5.89</td>
</tr>
<tr>
<td>Surface Coating</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>36.54</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.02</td>
<td>0.09</td>
<td>0.09</td>
<td>0.01</td>
<td>1.22</td>
<td>0.07</td>
<td>1.03</td>
<td>0.02</td>
<td>0.02</td>
</tr>
<tr>
<td>Paved Roads</td>
<td>5.13</td>
<td>1.03</td>
<td>0.25</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total Including Fugitives</td>
<td>24.78</td>
<td>3.88</td>
<td>3.10</td>
<td>0.01</td>
<td>1.22</td>
<td>36.60</td>
<td>1.03</td>
<td>8.85</td>
<td>5.89</td>
</tr>
</tbody>
</table>

Note:
The metal coil cutting operation has negligible emissions
## Emissions Calculations
### Particulate From Brushing and Polishing

**Company Name:** INOX Market North America (IMNA)
**Address:** 4400 S. Cowan Road, Muncie, Indiana 47302
**Permit Number:** 035-43339-00113
**Reviewer:** James Sperl

<table>
<thead>
<tr>
<th>Line</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Brushing Process No. 1 (Coils)</strong></td>
</tr>
<tr>
<td><strong>Brushing Heads</strong></td>
</tr>
<tr>
<td><strong>Polish Heads</strong></td>
</tr>
</tbody>
</table>

| **Brushing Process No. 2 (Blanks)** |
| **Brushing Heads** | 2 | 20 | 0.032 | 0.0045 | 5.61 | 0.79 | 1.68 | 0.84 | 2.52 |

Potential Emissions (tons/yr) = 19.62 2.76 5.89 2.94 8.83

### Notes

1. A review of AP-42, Figure 12.10-2, shows the metal cleaning, finishing operation as the final step in the processing of foundry castings. Both the polishing and brushing processes at INOX are metal finishing operations which are used to decorate and add texture to the metal surface. Since the polishing and brushing processes are similar to the cleaning, finishing final step for the processing of foundry castings, the emission factor from 3-04-003-60 (Finishing) is being used as it is most representative of the processes.

2. Steel alloy grade will be 400- and 300-series. Conservatively assuming 30% Chromium and 15% Nickel.
### Emission Calculations

**Coating - VOCs**

**Company Name:** INOX Market North America (IMNA)

**Address:** 4400 S. Cowan Road, Muncie, Indiana 47302

**Permit Number:** 035-43339-00113

**Reviewer:** James Sperl

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Mix Ratio (gal/mix)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Maximum Usage (gal/unit)</th>
<th>Maximum Production (units/hour)</th>
<th>Maximum Usage (gal/hr)</th>
<th>Pounds VOC per gallon of coating</th>
<th>Pounds VOC per gallon of coating less Water</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Coating Components</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roller Varnish (Innov IC.MEC.701)</td>
<td>8.2</td>
<td>0.95</td>
<td>49.76%</td>
<td>35.6%</td>
<td>14.1%</td>
<td>0.67</td>
<td>1</td>
<td>0.67</td>
<td>4.07</td>
<td>1.80</td>
<td>0.78</td>
<td>18.67</td>
<td>3.41</td>
</tr>
<tr>
<td>Thinner</td>
<td>7.8</td>
<td>0.05</td>
<td>100.00%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.03</td>
<td>1</td>
<td>0.03</td>
<td>7.84</td>
<td>7.84</td>
<td>0.26</td>
<td>6.33</td>
<td>1.16</td>
</tr>
<tr>
<td>As applied</td>
<td>8.2</td>
<td></td>
<td>0.5</td>
<td></td>
<td></td>
<td>4.26</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td><strong>Cleaning Solvents</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ethyl Acetate</td>
<td>7.5</td>
<td>100.00%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>0.5</td>
<td>N/A</td>
<td>N/A</td>
<td>3.43</td>
<td>82.39</td>
<td>15.04</td>
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<tr>
<td>Isopropyl Alcohol</td>
<td>6.6</td>
<td>100.00%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>0.2</td>
<td>N/A</td>
<td>N/A</td>
<td>1.32</td>
<td>31.79</td>
<td>5.80</td>
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<tr>
<td>IV/SALUB</td>
<td>7.5</td>
<td>100.00%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>0.3</td>
<td>N/A</td>
<td>N/A</td>
<td>1.92</td>
<td>46.09</td>
<td>8.41</td>
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<tr>
<td>Ethyl Alcohol</td>
<td>6.6</td>
<td>100.00%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>0.1</td>
<td>N/A</td>
<td>N/A</td>
<td>0.62</td>
<td>14.93</td>
<td>2.72</td>
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#### Notes:

Only one type of varnish is used, but it can be tinted to a variety of colors.

The Roller Varnish, Thinner, and Cleaning solvents have no HAPs emissions.

**Methodology:**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics) * VOC content is calculated "as applied" based on weighted average and mixing ratios.

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Transfer efficiency of roll coating is 100%. Therefore, there are no particulate emissions.

Uncontrolled PTE (ton/yr) **36.54**
### Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

**Company Name:** INOX Market North America (IMNA)
**Address:** 4400 S. Cowan Road, Muncie, Indiana 47302
**Permit Number:** 035-43339-00113
**Reviewer:** James Sperl

<table>
<thead>
<tr>
<th>Description/Location</th>
<th>MMBTU/hr</th>
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<tbody>
<tr>
<td>Comfort HEATERS (3)</td>
<td>2.85</td>
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#### Heat Input Capacity

<table>
<thead>
<tr>
<th>MMBtu/hr</th>
<th>HHV mmBtu</th>
<th>Potential Throughput MMCF/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.9</td>
<td>1020</td>
<td>24.5</td>
</tr>
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</table>

#### Pollutant

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
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<tr>
<td>Potential Emission in tons/yr</td>
<td>0.02</td>
<td>0.09</td>
<td>0.09</td>
<td>0.01</td>
<td>1.22</td>
<td>0.07</td>
<td>1.03</td>
</tr>
</tbody>
</table>

*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**

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>2.6E-05</td>
<td>1.5E-05</td>
<td>9.2E-04</td>
<td>0.02</td>
<td>4.2E-05</td>
<td>0.02</td>
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</tbody>
</table>

**HAPs - Metals**

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>6.1E-06</td>
<td>1.3E-05</td>
<td>1.7E-05</td>
<td>4.7E-06</td>
<td>2.6E-05</td>
<td>6.7E-05</td>
</tr>
</tbody>
</table>

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: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: INOX Market North America (IMNA)
Source Address: 4400 S. Cowan Road, Muncie, Indiana 47302
Permit Number: 035-43339-00113
Reviewer: James Sperl

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

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Semi-truck (entering plant) (one-way trip)</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>48.0</td>
<td>480.0</td>
<td>1800</td>
<td>0.341</td>
<td>3.4</td>
</tr>
<tr>
<td>Semi-truck (leaving plant) (one-way trip)</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>48.0</td>
<td>480.0</td>
<td>1800</td>
<td>0.341</td>
<td>3.4</td>
</tr>
</tbody>
</table>

Totals 20.0 960.0 6.8 2488.6

Table:

<table>
<thead>
<tr>
<th>Unmitigated Emission Factor, Ef = k * (sL)^0.91 * (W)^1.02</th>
<th>(Equation 1 from AP-42 13.2.1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unmitigated PTE of PM</td>
<td>2.57</td>
</tr>
<tr>
<td>Unmitigated PTE of PM10</td>
<td>0.51</td>
</tr>
<tr>
<td>Unmitigated PTE of PM2.5</td>
<td>0.13</td>
</tr>
</tbody>
</table>

| Mitigated PTE of PM | 0.51 |
| Mitigated PTE of PM10 | 0.13 |
| Mitigated PTE of PM2.5 | 0.13 |

Methodology

<table>
<thead>
<tr>
<th>Total Weight driven per day (ton/day)</th>
<th>= [Maximum Weight of Loaded Vehicle (tons/yr)] / (365 days/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum one-way distance (miles/day)</td>
<td>= SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]</td>
</tr>
<tr>
<td>Average Mike Per Trip (miles/ton)</td>
<td>= SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per day (trip/day)]</td>
</tr>
<tr>
<td>Mitigated PTE (Before Control) (ton/yr)</td>
<td>= [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)</td>
</tr>
<tr>
<td>Mitigated PTE (After Control) (ton/yr)</td>
<td>= [Mitigated PTE (Before Control) (ton/yr)] * (1 - Dust Control Efficiency)</td>
</tr>
</tbody>
</table>

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit
January 12, 2021

Emilio Padoan
INOX Market North America
4400 South Cowan Road
Muncie, IN 47302

Re: Public Notice
INOX Market North America
Permit Level: MSOP-New Source Construction
(Minor PSD/EO)
Permit Number: 035-43339-00113

Dear Mr. Emilio Padoan:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

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. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM’s online searchable database: http://www.Indiana.gov/apps/idem/caats/. Choose Search Option by Permit Number, then enter permit 43339

and

IDEM’s Virtual File Cabinet (VFC): http://www.Indiana.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.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.Indiana.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Muncie Public Library - Maring-Hunt Library, 2005 South High Street in Muncie, IN 47302. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.
Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to James Sperl, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 2-0459 or dial (317) 232-0459.

Sincerely,

Kathy Bourquein

Kathy Bourquein
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover Letter access via website 8/10/2020
January 12, 2021

To: Muncie Public Library – Maring-Hunt Library

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

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: INOX Market North America
Permit Number: 035-43339-00113

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

January 12, 2021
INOX Market North America
035-43339-00113

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or 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
PN AAA Cover Letter 2/28/2020
## Mail Code 61-53

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<th>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</th>
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<td>Emilio Padoan INOX Market North America 4400 S Cowan Rd Muncie IN 47302 (Source CAATS)</td>
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<td></td>
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<td>Federico Sbettega Owner INOX Market North America 4400 S Cowan Rd Muncie IN 47302 (RO CAATS)</td>
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<td>Delaware County Health Department 125 N Mulberry St Muncie IN 47305 (Health Department)</td>
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<td>Delaware County Commissioners 100 West Main Street Muncie IN 47305 (Local Official)</td>
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<td>Anthony Henley August Mack Environmental, Inc. 1302 North Meridian Street, Suite 300 Indianapolis IN 46202 (Consultant)</td>
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<td>Scott Underwood The Herald Bulletin 1133 Jackson St Anderson IN 46016 (Affected Party)</td>
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<td>Margaret P. Watson 200 N Forest Ave Muncie IN 47304 (Affected Party)</td>
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<table>
<thead>
<tr>
<th>Total number of pieces Listed by Sender</th>
<th>Total number of Pieces Received at Post Office</th>
<th>Postmaster, Per (Name of Receiving employee)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td>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 mail 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 insured and COD mail. See International Mail Manual for limitations on coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.</td>
</tr>
</tbody>
</table>

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