NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and Minor Source Operating Permit (MSOP) for Kloeckner Metals Corporation in Marion County

MSOP No.: M097-43475-00869

The Indiana Department of Environmental Management (IDEM) has received an application from Kloeckner Metals Corporation, located at 8301 East 33rd Street, Indianapolis, IN 46226, for a new source construction and MSOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Kloeckner Metals Corporation to construct and operate a new stationary metalworking facility that processes a variety of metal products, including but not limited to structural beams and tubing, channels, angles, pipes, bars, flats, plates, sheet products, grating, expanded metal, and flooring products.

The applicant has constructed and operated 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.

IDEM is aware that the source has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

Indianapolis Public Library
5420 East 38th Street
Indianapolis, IN 46218

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 M097-43475-00869 in all correspondence.

Comments should be sent to:

Deena Levering
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Deena Levering or (317) 234-5400
Or dial directly: (317) 234-5400
Fax: (317) 232-6749 attn: Deena Levering
E-mail: dleverin@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](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).

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 Deena Levering 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

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

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

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

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

<table>
<thead>
<tr>
<th>Operation Permit No.: M097-43475-00869</th>
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<tbody>
<tr>
<td>Master Agency Interest ID: 12321</td>
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<td>----------------------------------------</td>
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<th>Issued by:</th>
<th>Issuance Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heath Hartley, Section Chief</td>
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<tr>
<td>Permits Branch</td>
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<tr>
<td>Office of Air Quality</td>
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<thead>
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<th>Expiration Date:</th>
</tr>
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# TABLE OF CONTENTS

## SECTION A  SOURCE SUMMARY  ................................................................. 4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]
A.2 Emission Units and Pollution Control Equipment Summary

## SECTION B  GENERAL CONDITIONS ......................................................... 6
B.1 Definitions [326 IAC 2-1.1-1]
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]
B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
B.5 Term of Conditions [326 IAC 2-1.1-9.5]
B.6 Enforceability
B.7 Severability
B.8 Property Rights or Exclusive Privilege
B.9 Duty to Provide Information
B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]
B.11 Preventive Maintenance Plan [326 IAC 1-6-3]
B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]
B.14 Permit Renewal [326 IAC 2-6.1-7]
B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]
B.16 Source Modification Requirement
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 13-3 0-3-1]
B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]
B.19 Annual Fee Payment [326 IAC 2-1.1-7]
B.20 Credible Evidence [326 IAC 1-1-6]

## SECTION C  SOURCE OPERATION CONDITIONS ...................................... 11
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)] ................................................ 11
C.1 Permit Revocation [326 IAC 2-1.1-9]
C.2 Opacity [326 IAC 5-1]
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.5 Fugitive Dust Emissions [326 IAC 6-4]
C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-6.1-5(a)(2)] .................................................................... 13
C.7 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11] ................................................................. 13
C.8 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)] .......................................... 13
C.9 Compliance Monitoring [326 IAC 2-1.1-11]
C.10 Instrument Specifications [326 IAC 2-1.1-11]

Corrective Actions and Response Steps ............................................................................ 14
C.11 Response to Excursions or Exceedances
C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)] .......................... 15
C.13 Malfunctions Report [326 IAC 1-6-2]
C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]
C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS ................................................................. 17

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)] ................................................... 17
D.1.1 Particulate Matter (PM) [326 IAC 6.5-1-2]
D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)] ........................................ 17
D.1.3 Particulate Control

ANNUAL NOTIFICATION .................................................................................................................. 18

MALFUNCTION REPORT .................................................................................................................. 19

Affidavit of Construction ............................................................................................................... 21
SECTION A  SOURCE SUMMARY

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

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

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

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

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) Two (2) oxyfuel cutting tables with a combined total of thirteen (13) heads, identified as ST and MK, constructed in 2000, with a maximum capacity of 380.36 linear inches cut per hour, using water tables as control, and exhausting indoors.

(b) One (1) two-head plasma cutting table, identified as AL, constructed in 2000, with a maximum capacity of 70 pounds of metal removed per hour, using water tables as control, and exhausting indoors; includes one (1) plasma cutting coolant operation, with a maximum usage of 1.11 gallons per hour.

(c) Twenty-nine (29) natural gas comfort heaters as follows:

<table>
<thead>
<tr>
<th>Process Type</th>
<th>Quantity</th>
<th>Heat Input Capacity (MMBtu/hr) (each)</th>
<th>Construction Year</th>
<th>Exhausting</th>
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<tbody>
<tr>
<td>Heaters</td>
<td>25</td>
<td>0.15</td>
<td>2014</td>
<td>Outside</td>
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<tr>
<td>Heaters</td>
<td>2</td>
<td>0.13</td>
<td>2013, 1998</td>
<td>Outside</td>
</tr>
<tr>
<td>Heater</td>
<td>1</td>
<td>0.10</td>
<td>2018</td>
<td>Outside</td>
</tr>
<tr>
<td>Heater</td>
<td>1</td>
<td>0.093</td>
<td>2016</td>
<td>Outside</td>
</tr>
</tbody>
</table>

(d) Three (3) submerged arc welding stations, constructed in 2019, with a maximum electrode consumption per station of 16 pounds per hour, using no controls, and exhausting indoors.
(e) Seventeen (17) manual welding machines, constructed in 1998 through 2013, with a maximum electrode consumption per station of 4.45 pounds per hour, using no controls, and exhausting indoors.

(f) One (1) manual aerosol spray paint, consisting of 10 different paints, constructed in 1998, with a maximum combined usage of 0.07 gallons per hour, using no controls, and exhausting indoors.

(g) One (1) metal shearing operation, constructed in 2012, with a maximum throughput rate of 1.0 ton per hour, using no controls, and exhausting indoors.

(h) Unpaved Roads
SECTION B    GENERAL CONDITIONS

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]
This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.

(b) If actual construction of the emission units differs from the construction described in the application, the source may not continue operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
(a) This permit, M097-43475-00869, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]
Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability
Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Annual Notification [326 IAC 2.6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) All terms and conditions of permits established prior to M097-43475-00869 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,
(2) revised, or
(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:
Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

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.

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.

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

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

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

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

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

Entire Source

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

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

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

1. When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

2. If there is a change in the following:
   (A) Asbestos removal or demolition start date;
   (B) Removal or demolition contractor; or
   (C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

<table>
<thead>
<tr>
<th>C.7</th>
<th>Performance Testing [326 IAC 3-6]</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:</td>
</tr>
<tr>
<td></td>
<td>Indiana Department of Environmental Management</td>
</tr>
<tr>
<td></td>
<td>Compliance and Enforcement Branch, Office of Air Quality</td>
</tr>
<tr>
<td></td>
<td>100 North Senate Avenue</td>
</tr>
<tr>
<td></td>
<td>MC 61-53 IGCN 1003</td>
</tr>
<tr>
<td></td>
<td>Indianapolis, Indiana 46204-2251</td>
</tr>
<tr>
<td></td>
<td>no later than thirty-five (35) days prior to the intended test date.</td>
</tr>
<tr>
<td>(b)</td>
<td>The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.</td>
</tr>
<tr>
<td>(c)</td>
<td>Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ no 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.</td>
</tr>
</tbody>
</table>

Compliance Requirements [326 IAC 2-1.1-11]

<table>
<thead>
<tr>
<th>C.8</th>
<th>Compliance Requirements [326 IAC 2-1.1-11]</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>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.</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>C.9</th>
<th>Compliance Monitoring [326 IAC 2-1.1-11]</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>C.10</th>
<th>Instrument Specifications [326 IAC 2-1.1-11]</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>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.</td>
</tr>
<tr>
<td>(b)</td>
<td>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.</td>
</tr>
</tbody>
</table>
Corrective Actions and Response Steps

C.11 Response to Excursions or Exceedances

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.
C.13 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
(c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Two (2) oxyfuel cutting tables with a combined total of thirteen (13) heads, identified as ST and MK, constructed in 2000, with a maximum capacity of 380.36 linear inches cut per hour, using water tables as control, and exhausting indoors.

(b) One (1) two-head plasma cutting table, identified as AL, constructed in 2000, with a maximum capacity of 70 pounds of metal removed per hour, using water tables as control, and exhausting indoors; includes one (1) plasma cutting coolant operation, with a maximum usage of 1.11 gallons per hour.

(c) Twenty-nine (29) natural gas comfort heaters as follows:

<table>
<thead>
<tr>
<th>Process Type</th>
<th>Quantity</th>
<th>Heat Input Capacity (MMBtu/hr) (each)</th>
<th>Construction Year</th>
<th>Exhausting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heaters</td>
<td>25</td>
<td>0.15</td>
<td>2014</td>
<td>Outside</td>
</tr>
<tr>
<td>Heaters</td>
<td>2</td>
<td>0.13</td>
<td>2013, 1998</td>
<td>Outside</td>
</tr>
<tr>
<td>Heater</td>
<td>1</td>
<td>0.10</td>
<td>2018</td>
<td>Outside</td>
</tr>
<tr>
<td>Heater</td>
<td>1</td>
<td>0.093</td>
<td>2016</td>
<td>Outside</td>
</tr>
</tbody>
</table>

(d) Three (3) submerged arc welding stations, constructed in 2019, with a maximum electrode consumption per station of 16 pounds per hour, using no controls, and exhausting indoors.

(e) Seventeen (17) manual welding machines, constructed in 1998 through 2013, with a maximum electrode consumption per station of 4.45 pounds per hour, using no controls, and exhausting indoors.

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

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

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

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

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

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

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

D.1.3 Particulate Control

In order to assure compliance with Condition D.1.1, the water tables for particulate control shall be in operation and control emissions from the oxyfuel cutting tables and the plasma cutting table at all times the respective units are in operation.
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>Kloeckner Metals Corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>8301 East 33rd Street</td>
</tr>
<tr>
<td>City:</td>
<td>Indianapolis, Indiana 46226</td>
</tr>
<tr>
<td>Phone #:</td>
<td>(317) 964-2612</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>M097-43475-00869</td>
</tr>
</tbody>
</table>

I hereby certify that Kloeckner Metals Corporation is:  
☐ still in operation.  
☐ no longer in operation.

I hereby certify that Kloeckner Metals Corporation is:  
☐ in compliance with the requirements of MSOP M097-43475-00869.  
☐ not in compliance with the requirements of MSOP M097-43475-00869.

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

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.


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:** ________________  
**INSPECTOR:** ________________  
**CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:** __________________

**DATE/TIME MALFUNCTION STARTED:** _____ / _____ / 20____  
**ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:** __________________

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

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

**ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION:** __________________

**MEASURES TAKEN TO MINIMIZE EMISSIONS:** __________________

**REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:**

**CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:** __________________

**CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:** __________________

**CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:** __________________

**INTERIM CONTROL MEASURES: (IF APPLICABLE)** __________________

**MALFUNCTION REPORTED BY:** __________________  
**TITLE:** __________________  
**(SIGNATURE IF FAXED)**

**MALFUNCTION RECORDED BY:** __________________  
**DATE:** ________________  
**TIME:** ________________

*SEE PAGE 2
Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 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:

________________________________________________________________________
________________________________________________________________________
Affidavit of Construction

I, ____________________________, being duly sworn upon my oath, depose and say:

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 __________________________.

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 __________________________.

4. I hereby certify that Kloeckner Metals Corporation, 8301 East 33rd Street, Indianapolis, Indiana 46226, has constructed and will operate a metalworking facility that processes a variety of metal products, including but not limited to structural beams and tubing, channels, angles, pipes, bars, flats, plates, sheet products, grating, expanded metal, and flooring products. on ______________________ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on November 15, 2020 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M097-43475-00869, Plant ID No. 097-00869 issued on ______________________.

5. Permittee, please cross out the following statement if it does not apply: Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature__________________________
Date__________________________

STATE OF INDIANA)

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

Source Name: Kloeckner Metals Corporation
Source Location: 8301 East 33rd Street, Indianapolis, IN 46226
County: Marion (Warren Township)
SIC Code: 5051 (Metals Service Centers and Offices), 3441 (Fabricated Structural Metal), 3449 (Miscellaneous Structural Metal Work)

Operation Permit No.: M 097-43475-00869
Permit Reviewer: Deena Levering

On November 13, 2020, the Office of Air Quality (OAQ) received an application from Kloeckner Metals Corporation related to the operation of an existing stationary metalworking facility that processes a variety of metal products, such as various flat rolled steel, I-beams, tubing, angled steel and other shapes of steel materials.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Marion County (Warren Township).

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Attainment effective May 21, 2020, for the 2010 SO₂ standard for Center, Perry, and Wayne townships. Better than national standards for the remainder of the county.</td>
</tr>
<tr>
<td>CO</td>
<td>Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₁₀ standard.</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>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</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. Marion 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) **PM$_{2.5}$**
Marion County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) **Other Criteria Pollutants**
Marion County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

### Greenhouse Gas (GHG) Emissions
On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

### Background and Description of Emission Units and Pollution Control Equipment
The Office of Air Quality (OAQ) has reviewed an application, submitted by Kloeckner Metals Corporation on November 13, 2020, relating to the operation of a stationary metalworking facility. This source has been in operation since 1998.

The following emission units that were constructed and/or operated without a permit:

(a) Two (2) oxyfuel cutting tables with a combined total of thirteen (13) heads, identified as ST and MK, constructed in 2000, each with a maximum capacity of 380 linear inches cut per hour, using water tables as control, and exhausting indoors.

(b) One (1) two-head plasma cutting table, identified as AL, constructed in 2000, with a maximum capacity of 70 pounds of metal removed per hour, using water tables as control, and exhausting indoors; includes one (1) plasma cutting coolant operation, with a maximum usage of 1.11 gallons per hour.

(c) Twenty-nine (29) natural gas comfort heaters as follows:
(d) Three (3) submerged arc welding stations, constructed in 2019, with a maximum electrode consumption per station of 16 pounds per hour, using no controls, and exhausting indoors.

(e) Seventeen (17) manual welding machines, constructed in 1998 through 2013, with a maximum electrode consumption per station of 4.45 pounds per hour, using no controls, and exhausting indoors.

(f) One (1) manual aerosol spray paint, consisting of 10 different paints, constructed in 1998, with a maximum combined usage of 0.07 gallons per hour, using no controls, and exhausting indoors.

(g) One (1) metal shearing operation, constructed in 2012, with a maximum throughput rate of 1.0 ton per hour, using no controls, and exhausting indoors.

(h) Unpaved Roads

### Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit and operating rules.

IDEM is aware that a shot blast unit (consisting of four blasting wheels) was constructed in 2012. It has been deactivated and will be removed in 2021. It was last used in May 2021.

### Emission Calculations

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

### 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.

<table>
<thead>
<tr>
<th>Process Type</th>
<th>Quantity</th>
<th>Heat Input Capacity (MMBtu/hr) (each)</th>
<th>Construction Year</th>
<th>Exhausting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heaters</td>
<td>25</td>
<td>0.15</td>
<td>2014</td>
<td>Outside</td>
</tr>
<tr>
<td>Heaters</td>
<td>2</td>
<td>0.13</td>
<td>2013, 1998</td>
<td>Outside</td>
</tr>
<tr>
<td>Heater</td>
<td>1</td>
<td>0.10</td>
<td>2018</td>
<td>Outside</td>
</tr>
<tr>
<td>Heater</td>
<td>1</td>
<td>0.093</td>
<td>2016</td>
<td>Outside</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Unrestricted Source-Wide Emissions (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM^1</td>
</tr>
<tr>
<td>------</td>
</tr>
<tr>
<td>37.49</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
</tbody>
</table>

*Unrestricted Source-Wide Emissions (ton/year) & Title V Major Source Thresholds*
Unrestricted Source-Wide Emissions (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM¹</th>
<th>PM¹₀¹</th>
<th>PM₂₅¹-²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<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 PM₂₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂₅ listed is direct PM₂₅.
*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 PM₁₀ and PM₂₅ are each 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 Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for natural gas-fired comfort heaters, because these heaters are not steam generating units as defined in Section 60.41c.

(b) The requirements of the New Source Performance Standard for Ferroalloy Production Facilities 40 CFR 60, Subpart Z and 326 IAC 12, are not included in the permit for this source, because this source does not produce ferroalloy material. This source utilizes thermal cutting and shearing processes on the various flat rolled products and cutting of other types of metal products. They do not produce the actual metal.

(c) 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 the spray paint operation, because the source does not use a spray application as defined in Section 60.311. The source uses spray paints and not an atomizing spray application to apply the paint.

(d) 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 the source does not coat metal coils. As defined in Section 60.461 Definitions:

*A metal coil surface coating operation means the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.*

The metal is not packaged in a roll or coil and therefore is not subject to this subpart.
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):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Iron and Steel Foundries 40 CFR 63, Subpart EEEEE and 326 IAC 20-92 are not included in the permit for this source, since this source does not produce iron or steel, they use already produced metal to apply thermal cutting and shearing processes on the various flat rolled products and cutting of other types of metal products.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Iron and Steel Foundries Area Sources 40 CFR 63, Subpart ZZZZZZ are not included in the permit for this source. Although this source is located at an area source of HAPs, this source does not produce the iron or steel. They use already produced metal to apply thermal cutting and shearing processes on the various flat rolled products and cutting of other types of metal products.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources 40 CFR 63, Subpart HHHHHH (6H) are not included in the permit for the spray paint operation. Although this source is located at an area source of HAPs, the source does not have a spray applied coating operation as defined in 63.1180 Definitions:

Spray-applied coating operations means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

1. Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).

2. Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

3. Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

This source uses non-refillable aerosol containers to apply the paint for product identification and therefore is not subject to the requirements of this subpart.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Nonferrous Metals Processing Area Sources 40 CFR 63, Subpart TTTTTT (6T) are not included in the permit for this source. Although this source is an area source of HAPs, this source is not a secondary nonferrous metals processing facility as defined in Section 63.11472 Definitions:

Secondary nonferrous metals processing facility means a brass and bronze ingot making, secondary magnesium processing, or secondary zinc processing plant that uses furnace melting operations to melt post-consumer nonferrous metal scrap to make products including bars, ingots, blocks, or metal powders.
This source does not produce the metal but use already produced metal to apply thermal cutting and shearing processes on the various flat rolled products and cutting of other types of metal products.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Source Standards for Nine Metal Fabrication and Finishing Categories 40 CFR 63, Subpart XXXXXX are not included in the permit for this source. Although this source is located in an area source of HAPs and does perform fabricated structural metal and/or miscellaneous metal work, these are not the primary production at the source. Under Section 63.11522 What definitions apply to this subpart?

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

Accordingly, the source's revenue generated by fabricated structural metal (SIC 3441) and/or miscellaneous metal work (SIC 3449) only accounts for 11%, whereas, the primary revenue is generated by metal service centers (SIC 5051), making it the primary operation at the source.

Therefore, the source is not subject to the provisions of this subpart.

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

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<table>
<thead>
<tr>
<th>State Rule Applicability - Entire Source</th>
</tr>
</thead>
</table>

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 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4:

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

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

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

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

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

State Rule Applicability – Individual Facilities

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

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(e), the natural gas-fired comfort heaters are not subject to the requirements of 326 IAC 6-2, since the source is located in Marion County and is therefore subject to a more stringent limitation under 326 IAC 6.5.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), the source is not subject to the requirements of 326 IAC 6-3, since the source is in Marion County and is therefore subject to a more stringent limitation under 326 IAC 6.5.

326 IAC 6.5 PM Limitations Except Lake County

(a) Pursuant to 326 IAC 6.5-1-2(a), the thermal metal cutting operations, the natural gas combustion units, the welding, and the shearing operation, shall each not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf).

(b) Pursuant to 326 IAC 6.5-1-1(c)(5), the manual aerosol spray paint operation, is not subject to the provisions of 326 IAC 6.5, since it uses less than five (5) gallons per day of coating.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
The source is not subject to 326 IAC 326 IAC 7-1.1 because it has 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)
(a) Even though, the aerosol spray paint operation was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

(b) Even though, the saw coolant was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 8-2-4 (Coil Coating Operations)
Pursuant to 326 IAC 8-2-4(a), the aerosol spray paint operation is not subject to the requirements of 326 IAC 8-2-4(b), because the source does not coat metal sheets or strips that come in rolls or coils.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9(a)(1), the aerosol spray painting operation is not subject to the requirements of 326 IAC 8-2-9 because the source does not coat large or small farm machinery, small household appliances, office equipment, commercial or industrial machinery or equipment and/or does not have a Standard Industrial Classification Code of major groups #33, through #39.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the source, 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 source, 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>(1) IDEM OAQ has determined that testing of the metal cutting or any other unit is not required at this time to determine compliance with the particulate emission limits. IDEM has the authority to require testing at a later time if necessary, to demonstrate compliance with any applicable requirement.</td>
</tr>
<tr>
<td>There are no compliance 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 November 13, 2020.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 097-43475-00869. The staff recommends to the Commissioner that the New Source Construction and MSOP be approved.
(a) If you have any questions regarding this permit, please contact Deena Levering, 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) 234-5400 or (800) 451-6027, and ask for Deena Levering or (317) 234-5400.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: 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.
## Appendix A: Emission Calculations

### PTE Summary

**Company Name:** Kloeckner Metals Corporation  
**Source Address:** 8301 East 33rd Street, Indianapolis, IN 46226  
**Permit Number:** 097-43475-00869  
**Reviewer:** Deena Levering

---

### Table: Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emissions Unit</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 HAPs**</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metal Cutting</td>
<td>21.72</td>
<td>21.72</td>
<td>21.72</td>
<td>0.01</td>
<td>4.68</td>
<td>-</td>
<td>-</td>
<td>6.15E-01</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.04</td>
<td>0.16</td>
<td>0.16</td>
<td>0.01</td>
<td>2.16</td>
<td>0.12</td>
<td>1.82</td>
<td>0.04</td>
</tr>
<tr>
<td>Welding and Thermal Cutting</td>
<td>9.39</td>
<td>9.39</td>
<td>9.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>2.48E+00</td>
</tr>
<tr>
<td>Shearing</td>
<td>1.31E-02</td>
<td>1.31E-02</td>
<td>1.31E-02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Spray Paints</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.85</td>
<td>-</td>
</tr>
<tr>
<td>Saw Coolant</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>14.76</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Fugitive Emissions Unpaved Roads</td>
<td>6.32</td>
<td>1.69</td>
<td>0.17</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>14.76</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total Including Fugitives</strong></td>
<td><strong>37.49</strong></td>
<td><strong>32.97</strong></td>
<td><strong>31.46</strong></td>
<td><strong>6.02</strong></td>
<td><strong>6.84</strong></td>
<td><strong>16.73</strong></td>
<td><strong>1.82</strong></td>
<td></td>
</tr>
</tbody>
</table>

*PM2.5 listed is direct PM2.5

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

Source-Wide Total HAPs: 3.13
Appendix A: Emission Calculations
Potential to Emit Particulate, NOx, and HAPs

Metal Cutting

Materials Composition

<table>
<thead>
<tr>
<th>Material</th>
<th>Grade</th>
<th>% Stock</th>
<th>% as SO2</th>
<th>Mn</th>
<th>Ni</th>
<th>Cr</th>
<th>P</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Steel plate</td>
<td>A36</td>
<td>90%</td>
<td>0.01%</td>
<td>1.00%</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Carbon Steel plate</td>
<td>ASTM A572</td>
<td>23.7%</td>
<td>0.03%</td>
<td>1.35%</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Carbon Steel plate</td>
<td>ASTM A500</td>
<td>3.6%</td>
<td>0.01%</td>
<td>1.50%</td>
<td>0.40%</td>
<td>0.70%</td>
<td>0.02%</td>
</tr>
<tr>
<td>Abrasion Resistant Steel Plate</td>
<td>T-400</td>
<td>2.6%</td>
<td>0.01%</td>
<td>1.05%</td>
<td>0.50%</td>
<td>0.25%</td>
<td>0.01%</td>
</tr>
</tbody>
</table>

Notes:
1. From supplier information.

Plasma/Dry Fuel Torch Cutting Potential Particulates/HAP Emissions

<table>
<thead>
<tr>
<th>Model No.</th>
<th>Machine Name</th>
<th>Quantity</th>
<th>Max. Actual Metal Removed</th>
<th>Max. Actual Linear Inches Cut</th>
<th>Potential Metal Removed</th>
<th>Potential Linear Inches Cut</th>
<th>Cutting Technique</th>
<th>Fume Generation</th>
<th>Control Efficiency</th>
<th>HAP</th>
<th>Density of Nox</th>
<th>Nox Volume Emission Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>A36</td>
<td>plasma</td>
<td>505.39</td>
<td>1,585,286.00</td>
<td>338.38</td>
<td>0.007</td>
<td>0.002</td>
<td>0.001</td>
<td>4.05E-05</td>
<td>3.82E-03</td>
<td>3.09E-03</td>
<td>0.01</td>
<td>-</td>
</tr>
</tbody>
</table>

Methodology:

1. Density calculated using steel gas law at NTP, with average break-up of N2,NOx, refer from "Best Practice Document on Exposure to Nitrogen Oxides in Welding" International Institute of Welding, Dr. Ing. Spiegel-Cobauer & Dr. med. Wolfgang Zacharka.

2. Volume emission rates from Best Practice Document on Exposure to Nitrogen Oxides in Welding" International Institute of Welding, Dr. Ing. Spiegel-Cobauer & Dr. med. Wolfgang Zacharka.

3. Growth Factor - Productivity/Process Improvement = 2.0 [Based on potential productivity increases and/or process improvements]

4. The metal cutting values are determined by scaling as actual metal cut values and adding a robust factor of safety. The source used June 2019 actual data since this was their highest month for that year. In addition, the source included a factor of safety of "2" to account for any productivity increases of process improvements.

5. The above is based on maximum metal removed per source type from the highest operating month of 2019 (June 2019 as provided by the source on May 18, 2020)

6. Potential Metal Removed (lb/yr) = Max. Actual Metal Removed (lb/yr) x Growth Factor (Operational Hours) x Growth Factor (Productivity/Process Improvement)

7. Uncontrolled Particulate (ton/yr) for AL = Potential Metal Removed (lb/yr) x Fume Generation (g/in) x 0.0022 (lb/g) x 1ton/2000lb

8. Potential Nox Volume Emission Rate (m3/hr) x Density of Nox (g/m3) x Nox Volume Emission Rate (m3/hr) x 8760 Hours/Year x 0.00869

Notes:
1. From supplier information.
# Appendix A: Emissions Calculations

**Natural Gas Combustion Only**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Process</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Amount per unit</th>
<th>total</th>
</tr>
</thead>
<tbody>
<tr>
<td>NG Comfort Heaters</td>
<td>25</td>
<td>0.15</td>
<td>3.75</td>
<td></td>
</tr>
<tr>
<td>NG Comfort Heaters</td>
<td>2</td>
<td>0.13</td>
<td>0.26</td>
<td></td>
</tr>
<tr>
<td>NG Comfort Heaters</td>
<td>1</td>
<td>0.1</td>
<td>0.1</td>
<td></td>
</tr>
<tr>
<td>NG Comfort Heaters</td>
<td>1</td>
<td>0.93</td>
<td>0.93</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>29</td>
<td></td>
<td>5.04</td>
<td></td>
</tr>
</tbody>
</table>

**HHV**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCF</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 in tons/yr</td>
<td>0.04</td>
<td>0.16</td>
<td>0.16</td>
<td>0.01</td>
<td>2.16</td>
<td>0.12</td>
<td>1.82</td>
</tr>
</tbody>
</table>

**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>Emission Factor in lb/MMcf</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>Potential Emission in tons/yr</td>
<td>4.5E-05</td>
<td>2.6E-05</td>
<td>1.6E-03</td>
<td>0.04</td>
<td>7.4E-05</td>
<td>0.04</td>
</tr>
</tbody>
</table>

**HAPs - Metals**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</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>Potential Emission in tons/yr</td>
<td>1.1E-05</td>
<td>2.4E-05</td>
<td>3.0E-05</td>
<td>8.2E-06</td>
<td>4.5E-05</td>
<td>1.2E-04</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: Emissions Calculations

#### Welding and Thermal Cutting

**Company Name:** Kloeckner Metals Corporation  
**Source Address:** 8301 East 33rd Street, Indianapolis, IN 46226  
**Permit Number:** 097-43475-00869  
**Reviewer:** Deena Levering

<table>
<thead>
<tr>
<th>Process</th>
<th>Number of Stations</th>
<th>Maximum Metal Thickness (inches)</th>
<th>Maximum Metal Cutting Rate (inches/minute)</th>
<th>Emission Factors (lb pollutant/lb electrode)</th>
<th>Potential to Emit (lbs/hr)</th>
<th>HAPs (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Welding</strong></td>
<td></td>
<td></td>
<td></td>
<td>PM/PM10/PM2.5</td>
<td>Mn</td>
<td>Ni</td>
</tr>
<tr>
<td>Submerged Arc</td>
<td>3</td>
<td></td>
<td></td>
<td>16</td>
<td>384</td>
<td>0.036</td>
</tr>
<tr>
<td>Manual Welding Machines</td>
<td>17</td>
<td></td>
<td></td>
<td>4.45</td>
<td>106.8</td>
<td>0.0055</td>
</tr>
<tr>
<td>Stick (E7018 electrode)</td>
<td>0</td>
<td></td>
<td></td>
<td>0</td>
<td>0.0211</td>
<td>0.0009</td>
</tr>
<tr>
<td>Tungsten Inert Gas (TIG) (carbon steel)</td>
<td>0</td>
<td></td>
<td></td>
<td>0</td>
<td>0.0055</td>
<td>0.0005</td>
</tr>
<tr>
<td>Oxyacetylene (carbon steel)</td>
<td>0</td>
<td></td>
<td></td>
<td>0</td>
<td>0.0055</td>
<td>0.0005</td>
</tr>
<tr>
<td><strong>Flame Cutting</strong></td>
<td></td>
<td></td>
<td></td>
<td>PM/PM10/PM2.5</td>
<td>Mn</td>
<td>Ni</td>
</tr>
<tr>
<td>Oxyacetylene</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td>0.1622</td>
<td>0.0005</td>
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<tr>
<td>Oxymethane</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td>0.0815</td>
<td>0.0002</td>
</tr>
<tr>
<td>Plasma**</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td>0.0039</td>
<td>0</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Methodology:**

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

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

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

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

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

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

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

Metal Shearing

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-43475-00869
Reviewer: Deena Levering

Emission Factors

<table>
<thead>
<tr>
<th>Process Description</th>
<th>Number of Drop Points</th>
<th>Throughput(^1) PM/PM10/PM2.5(^2)</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shear</td>
<td>1</td>
<td>0.003</td>
<td>1.31E-02</td>
</tr>
</tbody>
</table>

Notes:

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

Methodology:

Uncontrolled PTE of PM (lb/hr) = Number of Drop Points x Throughput (ton/hr) x PM Emission Factor (lb/ton)
Uncontrolled PTE of PM (ton/yr) = Uncontrolled PTE of PM (lb/hr) x 8760hr/1yr x 1ton/2000lbs
## Company Name:
Kloeckner Metals Corporation

## Source Address:
8301 East 33rd Street, Indianapolis, IN 46226

## Permit Number:
097-43475-00869

### Appendix A: Emission Calculations

**Potential to Emit VOC and HAPs from**

**Company Name:** Kloeckner Metals Corporation  
**Source Address:** 8301 East 33rd Street, Indianapolis, IN 46226  
**Permit Number:** 097-43475-00869  
**Reviewer:** Deena Levering

### Spray Paint Operation

#### Actual Usage based off of 2,080 hours per year.

<table>
<thead>
<tr>
<th>ID</th>
<th>Paint Name</th>
<th>Density (lb/gal)</th>
<th>Actual Usage (ounces/year)</th>
<th>Actual Usage (lbf/hr)</th>
<th>Max. Usage (lbf/hr)</th>
<th>VOC Wt %</th>
<th>VOC Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Flat Black</td>
<td>5.9744</td>
<td>280</td>
<td>0.001</td>
<td>0.004</td>
<td>0.004</td>
<td>0.004</td>
</tr>
<tr>
<td>2</td>
<td>Orange</td>
<td>6.838</td>
<td>210</td>
<td>0.001</td>
<td>0.004</td>
<td>0.004</td>
<td>0.019</td>
</tr>
<tr>
<td>3</td>
<td>Gold</td>
<td>6.355</td>
<td>140</td>
<td>0.001</td>
<td>0.004</td>
<td>0.004</td>
<td>0.019</td>
</tr>
<tr>
<td>4</td>
<td>Green</td>
<td>5.758</td>
<td>240</td>
<td>0.001</td>
<td>0.004</td>
<td>0.004</td>
<td>0.019</td>
</tr>
<tr>
<td>5</td>
<td>Gold Pink</td>
<td>0.088</td>
<td>30</td>
<td>0.001</td>
<td>0.004</td>
<td>0.004</td>
<td>0.019</td>
</tr>
<tr>
<td>6</td>
<td>Silver</td>
<td>5.014</td>
<td>830</td>
<td>0.001</td>
<td>0.004</td>
<td>0.004</td>
<td>0.019</td>
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<tr>
<td>7</td>
<td>Gold Red</td>
<td>6.838</td>
<td>965</td>
<td>0.005</td>
<td>0.004</td>
<td>0.004</td>
<td>0.019</td>
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<tr>
<td>8</td>
<td>Blue</td>
<td>3.838</td>
<td>770</td>
<td>0.003</td>
<td>0.005</td>
<td>0.005</td>
<td>0.019</td>
</tr>
<tr>
<td>9</td>
<td>Gloss White</td>
<td>6.048</td>
<td>740</td>
<td>0.003</td>
<td>0.005</td>
<td>0.005</td>
<td>0.019</td>
</tr>
<tr>
<td>10</td>
<td>Olive Purple</td>
<td>0.175</td>
<td>100</td>
<td>0.003</td>
<td>0.005</td>
<td>0.005</td>
<td>0.019</td>
</tr>
</tbody>
</table>

**Safety Factor = 4.2**

### Methodology:

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

#### Xylene

<table>
<thead>
<tr>
<th>ID</th>
<th>Xylene %</th>
<th>Ethylbenzene %</th>
<th>Toluene %</th>
<th>Cumene %</th>
<th>Weight (lbf/hr)</th>
<th>ton/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2.3%</td>
<td>0.80%</td>
<td>-</td>
<td>-</td>
<td>6.9E-08</td>
<td>3.03E-07</td>
</tr>
<tr>
<td>2</td>
<td>-</td>
<td>-</td>
<td>11.70%</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>3</td>
<td>-</td>
<td>-</td>
<td>13.40%</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>4</td>
<td>-</td>
<td>-</td>
<td>13.70%</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>5</td>
<td>-</td>
<td>-</td>
<td>12.90%</td>
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<td>-</td>
<td>-</td>
</tr>
<tr>
<td>6</td>
<td>-</td>
<td>-</td>
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<td>-</td>
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<td>-</td>
<td>-</td>
<td>13.90%</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>8</td>
<td>-</td>
<td>0.10%</td>
<td>-</td>
<td>-</td>
<td>0.5E-08</td>
<td>2.0E-06</td>
</tr>
<tr>
<td>9</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
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<td>22.90%</td>
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<td>-</td>
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</tr>
</tbody>
</table>

**Total Xylene = 1.13E-07 ton/yr**

### Ethylbenzene

<table>
<thead>
<tr>
<th>ID</th>
<th>Xylene %</th>
<th>Ethylbenzene %</th>
<th>Toluene %</th>
<th>Cumene %</th>
<th>Weight (lbf/hr)</th>
<th>ton/yr</th>
</tr>
</thead>
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<td>-</td>
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</tr>
<tr>
<td>3</td>
<td>-</td>
<td>-</td>
<td>13.40%</td>
<td>-</td>
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</tr>
<tr>
<td>4</td>
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<td>-</td>
<td>0.10%</td>
<td>-</td>
<td>-</td>
<td>0.5E-08</td>
<td>2.0E-06</td>
</tr>
<tr>
<td>9</td>
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<td>-</td>
<td>22.90%</td>
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</tbody>
</table>

**Total Ethylbenzene = 1.13E-07 ton/yr**

### Toluene

<table>
<thead>
<tr>
<th>ID</th>
<th>Xylene %</th>
<th>Ethylbenzene %</th>
<th>Toluene %</th>
<th>Cumene %</th>
<th>Weight (lbf/hr)</th>
<th>ton/yr</th>
</tr>
</thead>
<tbody>
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</tr>
<tr>
<td>3</td>
<td>-</td>
<td>-</td>
<td>13.40%</td>
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</tr>
<tr>
<td>4</td>
<td>-</td>
<td>-</td>
<td>13.70%</td>
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<td>-</td>
<td>-</td>
</tr>
<tr>
<td>5</td>
<td>-</td>
<td>-</td>
<td>12.90%</td>
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<td>-</td>
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<tr>
<td>6</td>
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<td>-</td>
<td>13.30%</td>
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<td>-</td>
<td>-</td>
<td>13.90%</td>
<td>-</td>
<td>-</td>
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</tr>
<tr>
<td>8</td>
<td>-</td>
<td>0.10%</td>
<td>-</td>
<td>-</td>
<td>0.5E-08</td>
<td>2.0E-06</td>
</tr>
<tr>
<td>9</td>
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<tr>
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<td>-</td>
<td>22.90%</td>
<td>-</td>
<td>-</td>
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</table>

**Total Toluene = 1.13E-07 ton/yr**

### Cumene

<table>
<thead>
<tr>
<th>ID</th>
<th>Xylene %</th>
<th>Ethylbenzene %</th>
<th>Toluene %</th>
<th>Cumene %</th>
<th>Weight (lbf/hr)</th>
<th>ton/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2.3%</td>
<td>0.80%</td>
<td>-</td>
<td>-</td>
<td>6.9E-08</td>
<td>3.03E-07</td>
</tr>
<tr>
<td>2</td>
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</tr>
<tr>
<td>3</td>
<td>-</td>
<td>-</td>
<td>13.40%</td>
<td>-</td>
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</tr>
<tr>
<td>4</td>
<td>-</td>
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<td>13.70%</td>
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</tr>
<tr>
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<td>13.30%</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>7</td>
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<td>-</td>
<td>13.90%</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>8</td>
<td>-</td>
<td>0.10%</td>
<td>-</td>
<td>-</td>
<td>0.5E-08</td>
<td>2.0E-06</td>
</tr>
<tr>
<td>9</td>
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<td>-</td>
<td>-</td>
</tr>
<tr>
<td>10</td>
<td>-</td>
<td>22.90%</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

**Total Cumene = 1.13E-07 ton/yr**

**Combined HAP = 2.64E-03 ton/yr**

**Single Highest HAP = 2.64E-03 ton/yr**

**Methodology:**

- HAP lbf/hr = Max. Usage lbf/yr x HAP % Weight / 8760 hours
- Combined HAP ton/yr = Summation of all HAPs (ton/yr)
Appendix A: Emission Calculations
Potential to Emit VOC from
Saw Coolant

Company Name: Kloeckner Metals Corporation
Source Address: 8301 East 33rd Street, Indianapolis, IN 46226
Permit Number: 097-43475-00869
Reviewer: Deena Levering

<table>
<thead>
<tr>
<th>Material</th>
<th>Density lb/gal</th>
<th>Actual Usage gal/yr</th>
<th>Actual Usage gal/hr</th>
<th>Max Usage gal/hr</th>
<th>VOC Wt %</th>
<th>Potential to Emit VOC lb/hr</th>
<th>Potential to Emit VOC ton/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Band Ade</td>
<td>8.43</td>
<td>550</td>
<td>0.26</td>
<td>1.11</td>
<td>36%</td>
<td>3.37</td>
<td>14.76</td>
</tr>
</tbody>
</table>

Safety Factor = 4.2
Actual usage based off of 2,080 hours per year.
Safety Factor = 8760/2080
Per the SDS, this material has no HAPs.
\(^1\) Actual usage is based off the sources 2019 data of 550 gallons per year, the source only operates 2080 hours per year (8 hours, 5 days/wk, for 52 weeks per year)

**Methodology:**
Actual Usage (gal/hr) = Actual Usage provided by source of 550 gallons per year x 1yr/2080 hours
Max. Usage (gal/hr) = Actual Usage (gal/hr) x Safety Factor
Potential to Emit (lb/hr) = Density (lb/gal) x Max Usage (gal/hr) x VOC Wt%
Potential to Emit (ton/yr) = Potential to Emit (lb/hr) x 8760hrs/1yr x 1ton/2000lbs
Unpaved Roads at Industrial Site

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

### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</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 distance (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Semi Trucks Unloading Inbound</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>40.0</td>
<td>400.0</td>
<td>1003</td>
<td>0.190</td>
<td>1.9</td>
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<tr>
<td>Semi Trucks Unloading Outbound</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>20.0</td>
<td>200.0</td>
<td>886</td>
<td>0.130</td>
<td>1.3</td>
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<tr>
<td>Semi Trucks Loading Inbound</td>
<td>12.0</td>
<td>1.0</td>
<td>12.0</td>
<td>40.0</td>
<td>480.0</td>
<td>528</td>
<td>0.100</td>
<td>1.2</td>
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<tr>
<td>Semi Trucks Loading Outbound</td>
<td>12.0</td>
<td>1.0</td>
<td>12.0</td>
<td>40.0</td>
<td>480.0</td>
<td>528</td>
<td>0.100</td>
<td>1.2</td>
</tr>
</tbody>
</table>

**Totals**: 44.0

Average Vehicle Weight Per Trip = 30.0 tons/trip
Average Miles Per Trip = 0.14 miles/trip

Unmitigated Emission Factor, \( E_f = k \times \left[ \frac{S}{12} \right]^a \times \left[ \frac{W}{3} \right]^b \) (Equation 1a from AP-42 13.2.2)

<table>
<thead>
<tr>
<th></th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
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</thead>
<tbody>
<tr>
<td>( k )</td>
<td>4.9</td>
<td>1.5</td>
<td>0.15</td>
</tr>
<tr>
<td>( s )</td>
<td>6.0</td>
<td>6.0</td>
<td>6.0</td>
</tr>
<tr>
<td>( a )</td>
<td>0.7</td>
<td>0.9</td>
<td>0.9</td>
</tr>
<tr>
<td>( b )</td>
<td>0.45</td>
<td>0.45</td>
<td>0.45</td>
</tr>
</tbody>
</table>

where \( k \) = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
\( s \) = mean % silt content of unpaved roads (AP-42 Table 13.2.2-2 for Industrial Roads)
\( a \) = constant (AP-42 Table 13.2.2-2 for Industrial Roads)
\( b \) = constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Average Vehicle Weight Per Trip (ton/trip) = \( \frac{\text{Total Weight driven per day (ton/day)}}{\text{Maximum trips per day (trip/day)}} \)

Average Miles Per Trip (miles/trip) = \( \frac{\text{Maximum one-way distance (miles/day)}}{\text{Maximum trips per year (trip/day)}} \)

Mitigated PTE (Before Control) (tons/yr) = \( \text{Mitigated Emission Factor (lb/mile)} \times \text{Average Vehicle Weight Per Trip (tons/trip)} \times (\text{Average Miles Per Trip (miles/trip)} \times 2000 \text{ lbs/ton}) \)

Mitigated Emission Factor, \( E_{ext} = E \times \left[ \frac{365 - P}{365} \right] \) (Equation 2 from AP-42 13.2.2)

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Semi Trucks Unloading Inbound</td>
<td>1.94</td>
<td>0.52</td>
<td>0.05</td>
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<td>Semi Trucks Unloading Outbound</td>
<td>1.33</td>
<td>0.35</td>
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<td>Semi Trucks Loading Inbound</td>
<td>1.84</td>
<td>0.49</td>
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<td>Semi Trucks Loading Outbound</td>
<td>1.22</td>
<td>0.33</td>
<td>0.03</td>
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</table>

**Totals**: 6.32 1.69 0.17

### Methodology

- Total Weight driven per day (ton/day) = \( \text{Maximum Weight of Loaded Vehicle (tons/trip)} \times \text{Maximum trips per day (trip/day)} \)
- Maximum one-way distance (miles/day) = \( \text{Maximum trips per year (trip/day)} \times \text{Maximum one-way distance (miles/trip)} \)
- Average Vehicle Weight Per Trip (ton/trip) = \( \text{Total Weight driven per day (ton/day)} \) / \( \text{Maximum trips per day (trip/day)} \) / \( 5280 \text{ ft/mile} \)
- Average Miles Per Trip (miles/trip) = \( \frac{\text{Maximum one-way distance (miles/day)}}{\text{Maximum trips per year (trip/day)}} \)
- Mitigated PTE (Before Control) (tons/yr) = \( \text{Mitigated Emission Factor (lb/mile)} \times (\text{Average Vehicle Weight Per Trip (tons/trip)} \times \text{Average Miles Per Trip (miles/trip)} \times 2000 \text{ lbs/ton}) \)

**Abbreviations**

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit
- Dust Control Efficiency
June 2, 2021

Todd ONeill
Kloeckner Metals Corporation
8301 E 33rd St
Indianapolis IN 46226

Re: Public Notice
Kloeckner Metals Corporation
Permit Level: MSOP New Source Construction
(Minor PSD/EO) (120)
Permit Number: 097-43475-00869

Dear Todd ONeill:

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.in.gov/apps/idem/caats/ . Choose Search Option by Permit Number, then enter permit 43475 and

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

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.in.gov/idem/public-notices/

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 Indianapolis Public Library - East 38th Street, 5420 E 38th St, Indianapolis IN 46218. 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 Deena Levering, 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 4-5400 or dial (317) 234-5400.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
June 2, 2021

To: Indianapolis Public Library - East 38th Street 5420 E 38th St Indianapolis IN 46218

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: Kloeckner Metals Corporation
Permit Number: 097-43475-00869

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

June 2, 2021
Kloeckner Metals Corporation
097-43475-00869

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/public-notices/.

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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<td>097-43475-00869 1 of 3</td>
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<td>Bart Clifford Chief Operating Officer (COO) Kloeckner Metals Corporation 500 Colonial Center Plkwy Roswell GA 30076 (RO CAATS)</td>
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**Total number of Pieces Received at Post Office**

**Postmaster, Per (Name of Receiving employee)**

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Mail Code 61-53

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<th>6/2/2021</th>
<th>Kloeckner Metals Corporation 097-43475-00869</th>
<th>3 of 3</th>
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<tbody>
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<td>Name and address of Sender</td>
<td>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</td>
<td>Type of Mail: CERTIFICATE OF MAILING ONLY</td>
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<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
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<td>Marion County Health Department 3838 North Rural Street Indianapolis IN 46205 (Local Official)</td>
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Total number of pieces Listed by Sender
Total number of Pieces Received at Post Office
Postmaster, Per (Name of Receiving employee)

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express 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 inured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.