



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
Governor

Brian C. Rockensuess  
Commissioner

February 12, 2024

Ms. Debra Shore  
Regional Administrator  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3950

Re: Commissioner's Order 2023-Air-02 for  
U.S. Mineral Products Company, D/B/A  
Isolatek International, in Huntington,  
Huntington County, Indiana

Dear Ms. Shore:

The purpose of this letter is to submit for United States Environmental Protection Agency (U.S. EPA) review and approval *Commissioner's Order 2023-Air-02 for U.S. Mineral Products Company, D/B/A Isolatek International, in Huntington, Huntington County, Indiana*. This Commissioner's Order amends and will replace Commissioner's Order 2023-Air-01 which was submitted on November 6, 2023, with Indiana's State Implementation Plan (SIP) for the "*Attainment Demonstration and Technical Support Document for the Huntington, Indiana 2010 Primary 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Nonattainment Area and Commissioner's Order No. 2023-Air-01 for Isolatek*".

Indiana adopted Commissioner's Order 2023-Air-01 in response to a letter from Isolatek on October 2, 2023, requesting the establishment of SO<sub>2</sub> emission limits to ensure the facility's compliance with the 2010 primary SO<sub>2</sub> National Ambient Air Quality Standards (NAAQS). On January 3, 2024, Indiana received a letter from Isolatek International requesting a new Commissioner's Order to supersede and replace Commissioner's Order 2023-Air-01 to account for certain modifications for sampling and analysis requirements. In all other aspects, the requests in Isolatek's October 2, 2023, letter remain operative.

The Indiana Department of Environmental Management (IDEM) provided a 30-day comment period and opportunity for a public hearing concerning *Commissioner's Order 2023-Air-02 for U.S. Mineral Products Company, D/B/A Isolatek International, in Huntington, Huntington County, Indiana*. A public hearing was not requested and there were not any comments received. Please refer to the attached Public Participation Process Documentation for further information and dates regarding the public participation process.



Visit [on.IN.gov/survey](https://on.IN.gov/survey) or scan the QR code to provide feedback.

*We appreciate your input!*



Ms. Debra Shore  
Page 2 of 2

A copy of this submittal was sent to U.S. EPA Region 5 through the State Planning Electronic Collaboration System (SPeCS).

IDEM staff worked with U.S. EPA Region 5 to address any potential concerns regarding the submission. If you have any questions or need additional information, please contact Mark Derf, Chief, Technical Support and Modeling Section, Office of Air Quality, at (317) 233-5682 or [mdarf@idem.IN.gov](mailto:mdarf@idem.IN.gov).

Sincerely,



Matt Stuckey  
Assistant Commissioner  
Office of Air Quality

MS/sad/md/bc/gf/as

Attachment A: Commissioner's Order

Attachment B: Public Participation Process Documentation

cc: John Mooney, U.S. EPA Region 5 (no enclosure)  
Doug Aburano, U.S. EPA Region 5 (no enclosure)  
Sara Arra, U.S. EPA Region 5 (no enclosure)  
Chris Panos, U.S. EPA Region 5 (no enclosure)  
Elizabeth Selbst, U.S. EPA Region 5 (no enclosure)  
Melissa Sheffer, U.S. EPA Region 5 (no enclosure)  
Matt Stuckey, IDEM (no enclosure)  
Scott Deloney, IDEM (no enclosure)  
Mark Derf, IDEM (no enclosure)  
Brian Callahan, IDEM (no enclosure)  
Gale Ferris, IDEM (no enclosure)  
Amy Smith, IDEM (w/ enclosure)  
File Copy

Commissioner's Order No. 2023-  
Air-02 for U.S. Mineral Products  
Company, D/B/A Isolatek  
International, in Huntington,  
Huntington County, Indiana

**HUNTINGTON, INDIANA 2010 PRIMARY  
1-HOUR SULFUR DIOXIDE (SO<sub>2</sub>)  
NONATTAINMENT AREA**

Prepared By:  
The Indiana Department of Environmental  
Management

February 2024

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Attachment A: Commissioner's Order  
Appendix A1: Request for Commissioner's Order  
Attachment B: Public Process Participation  
Documentation

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# **ATTACHMENT A**

## **COMMISSIONER'S ORDER**

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
*Governor*

**Brian C. Rockensuess**  
*Commissioner*

STATE OF INDIANA  
COUNTY OF MARION

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)

SS:

BEFORE THE INDIANA DEPARTMENT  
OF ENVIRONMENTAL MANAGEMENT

IN THE MATTER OF:  
ORDER OF THE COMMISSIONER  
PURSUANT TO IC 13-14-2-1  
FOR U.S. MINERAL PRODUCTS COMPANY  
(D/B/A ISOLATEK INTERNATIONAL)

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## NOTICE AND ORDER OF THE COMMISSIONER OF THE DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

This Notice and Order of the Commissioner of the Department of Environmental Management (“Order”) is issued pursuant to Indiana Code (“IC”) 13-14-1-9, IC 13-14-2-1, and IC 13-14-2-7. During the Commissioner’s review, it was determined that the Petition should be granted according to the terms specified below:

### PETITION

Petitioner is U.S. Mineral Products Company (d/b/a Isolatek) (“Petitioner”), a stationary acoustic and thermal insulation manufacturing facility with Source I.D. Number 069-00021, located at 701 North Broadway Street in Huntington, Huntington County, Indiana, and permitted under the Part 70 air operating permit program. Isolatek charges a mixture of fuel (coke), slag, and other feed material (e.g., feldspar) from the smelting and refining of raw ore at integrated steel mills in cupolas. The charged mixture is heated to a molten state and processed to form mineral wool for creating thermal or acoustical insulation material.

On August 10, 2015, the U.S. Environmental Protection Agency (U.S.EPA) finalized requirements for air agencies to monitor or model sulfur dioxide (SO<sub>2</sub>) levels in areas with large sources of SO<sub>2</sub> emissions to help implement the 1-hour SO<sub>2</sub> National Air Ambient Quality Standard (NAAQS), otherwise known as the Data Requirements Rule (DRR). This final rule established that air agencies would characterize air quality around sources that emit 2,000 tons per year (tpy) or more of SO<sub>2</sub>.

On April 9, 2018, the U.S. EPA designated Huntington Township within Huntington County Indiana as nonattainment under the 2010 1-hour standard for sulfur dioxide (SO<sub>2</sub>). This designation was supported by preliminary dispersion modeling conducted by U.S. EPA that



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*We appreciate your input!*



suggested that SO<sub>2</sub> emissions from Isolatek may potentially contribute to a violation of the 2010 1-hour standard for SO<sub>2</sub>.

On October 2, 2023, the Petitioner submitted a request to the Commissioner to impose permanent and enforceable SO<sub>2</sub> emission limitations and emission rates on the Petitioner in order to ensure continued attainment of the 1-hour SO<sub>2</sub> NAAQS in the area surrounding Isolatek in Huntington Township within Huntington County. Commissioner's Order 2023-Air\_01 was approved and signed on November 6, 2023.

Subsequent review requires additional compliance measures be added to adequately determine the sulfur dioxide emissions in the cupola and screenhouse stacks exhausts. These measures include sampling of the mineral wool product from the cupola, the fly ash from the baghouse and slag waste from the cupola to determine each respective sulfur contents. The results of this sampling are to be included in the emission calculations to determine the SO<sub>2</sub> emission rates for compliance with the SO<sub>2</sub> emission limitations.

The purpose of this Commissioner's Order is to amend and replace Commissioner's Order 2023-Air 01, approved and signed on November 6, 2023. This Commissioner's Order supersedes and replaces Commissioner's Order 2023-Air 01. All conditions contained therein are included in this Commissioner's Order and this Commissioner's Order adds additional terms and conditions. Upon the effective date of this Commissioner's Order, Commissioner's Order 2023-Air 01 will no longer have any effect in favor of this Commissioner's Order.

The Petitioner proposed SO<sub>2</sub> emission rates, expressed in SO<sub>2</sub> pounds per hour ("lb/hr"), applicable to both Cupolas (identified as EU #1 and EU #2), exhausting to a shared stack #1 and two blow chambers (identified as EU #3 and EU #4) exhausting to screen houses (identified as CE #3 and CE #4), enclosed by a single building, exhausting to a single stack #3 as follows:

- a. 160.0 lb/hr combined for the cupolas EU #1 and EU #2 exhausting to stack #1; and
- b. 20.0 lb/hr combined for the blow chambers EU #3 and EU #4 exhausting to screen houses CE #3 and CE #4 and exhausting to a single stack #3.

### **FINDINGS**

Pursuant to IC 13-14-2-1(b) and IC 13-14-2-7(1), the Commissioner may issue Orders to secure compliance with Indiana's environmental statutes and rules, including the ambient air quality standard for SO<sub>2</sub> at 326 Indiana Administrative Code ("IAC") 1-3-4(b)(1)(A).

Petitioner's proposal and this Order are intended to support IDEM's demonstration of attainment for the 2010 1-hour SO<sub>2</sub> NAAQS in Huntington Township within Huntington County.

Based on the foregoing information, IDEM finds the following:

1. Permanent and enforceable SO<sub>2</sub> emission limitations and emission rates for Isolatek are required in order to model attainment of the 1-hour SO<sub>2</sub> NAAQS in the area surrounding the Petitioner.



2. A Commissioner's Order is required to ensure SO<sub>2</sub> emission limitations and emission rates remain permanent and federally enforceable, as required by 42 U.S.C. § 7407(d)(3)(E)(iii) until the SO<sub>2</sub> emission limitations and emission rates are incorporated into the Petitioner's Part 70 Operating Permit.
3. Approval by U.S. EPA of the Commissioner's Order into the Indiana State Implementation Plan ("SIP") is required to make Order requirements federally enforceable. Upon approval into the Indiana SIP, the Order requirements become applicable requirements as defined in 326 IAC 2-7-1(6).
4. Based on modeling conducted by the Petitioner and reviewed and approved by IDEM, the SO<sub>2</sub> emission rates proposed by the Petitioner in Order paragraphs 2 and 3 are adequate to assure attainment of the SO<sub>2</sub> NAAQS.

### **ORDER**

1. This Order approves the Petition submitted by the Petitioner according to the terms specified below. This Order imposes on the Petitioner the SO<sub>2</sub> emission limitations and emission rates described below.
2. The combined emissions from cupolas (EU #1 and EU #2) exhausting to stack #1 shall not exceed the combined SO<sub>2</sub> emission rate as follows:
  - a. 160.0 lb/hr
3. The combined emissions from blow chambers (EU #3 and EU #4) exhausting through screen houses (CE #3 and CE #4) to stack #3 shall not exceed the combined SO<sub>2</sub> emission rate as follows:
  - a. 20.0 lb/hr
4. The Petitioner shall comply with the SO<sub>2</sub> emission limitations and emission rates beginning from effective date of Commissioner's order as outlined in this order.
5. As required by 326 IAC 2-7-2(d)(1) and 326 IAC 2-7-5, the Petitioner shall apply to incorporate these Order requirements, including reporting and recordkeeping requirements and methods to determine compliance, into its Part 70 Operating Permit within ninety (90) days of U.S. EPA approval of the Commissioner's Order into the Indiana SIP.
6. From effective date of Commissioner's order, until IDEM issues a Permit incorporating Order requirements, the Petitioner shall comply with the reporting and recordkeeping requirements and methods to determine compliance specified in this paragraph.
  - a. Reporting: The Petitioner shall submit to IDEM, on a quarterly basis,
    - i. A report of the monthly average hourly SO<sub>2</sub> emissions in pounds per hour from each cupola EU #1 and EU #2 based upon the calculation method as set forth in Section 6(c)(ii) and the monthly average hourly SO<sub>2</sub> emissions in pounds per hour from each blow chamber EU #3 and EU #4 based upon the calculation method as set forth in Section 6(c)(iii). Each report will be

- submitted not later than thirty (30) days after the end of the quarter being reported.
- ii. A report of (1) throughput of all input materials (coke, slag, and other feed material (e.g., feldspar)) in pounds per hour for each cupola (EU #1 and EU #2) for each 12-hour shift and (2) throughput of output materials (mineral wool fiber, fly ash and slag waste) for a defined reported time period. Each report will be submitted not later than thirty (30) days after the end of the quarter being reported.
  - iii. A report of any exceedances of the SO<sub>2</sub> emissions limits for the cupolas or blow chambers, as stated in Order paragraphs 2 and/or 3. This report will be submitted no later than thirty (30) days after the end of the quarter being reported.
- b. Stack Testing: The Petitioner shall perform SO<sub>2</sub> testing of cupolas EU #1 and EU #2 exhausting to stack #1 and the blow chambers EU #3 and EU #4 and screen houses CE #3 and CE #4 exhausting to stack #3 utilizing methods approved by the Commissioner at least once every sixty (60) months from the date of the most recent valid stack test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Permit Condition C.7, Performance Testing, in Title V Permit No. T069-45112-00021 contains the Petitioner's obligation with regard to the performance testing required herein. Material sampling (as-fed during test), mineral wool product sampling from the cupola (before additives are introduced to the product), fly ash and slag waste and analysis methods as set forth in Section 6(c)(i) shall be included in the test protocol submitted to OAQ. Stack testing shall be conducted with input materials (coke, slag, and other feed material (e.g., feldspar)) representative of the input material typically processed in the cupolas during normal operation. The initial SO<sub>2</sub> stack test for the cupolas shall occur no later than 180 days from the effective date as determined in Order paragraph 4.
- c. Compliance determination: Petitioner shall demonstrate compliance with the SO<sub>2</sub> emission rates in Order paragraphs 2 and 3 above as follows:

Sampling, Analysis and Calculations:

- (i) Sampling: Coke, slag, and final mineral wool product and waste stream products of fly ash and slag waste are to be sampled by Petitioner and analyzed by an independent laboratory, utilizing American Society for Testing and Materials (ASTM) standards for sampling and chemical analysis, method D4239 and appropriate analytical methods for the mineral wool product and the fly ash and slag waste. A monthly sampling analyses of the coke, slag, mineral wool and waste stream products (fly ash and slag waste) at the facility or sulfur content information provided by the vendor shall be the source of the data of the sulfur content of the coke, slag, mineral wool product and waste stream products (fly ash and slag waste) to be used in calculating and reporting the hourly SO<sub>2</sub> emissions. The current sampling and analysis protocol to be used in lieu of certified analyses, certificates of analysis, or certification of compliance with Isolatek's specifications for coke, slag,

mineral wool product and waste stream products (fly ash and slag waste) is as follows:

(A) The sample acquisition points for coke and slag shall be at locations where representative samples of the respective material shipments may be obtained. Similarly, sample acquisition points for the mineral wool shall be at the cupola or directly downstream of the cupola where representative samples of the mineral wool product from the cupola may be obtained. Acquisition points for the fly ash shall be from the baghouse dust collected for disposal and for the slag waste from the slag waste pit.

(B) Samples shall be composited by Petitioner for coke, slag, mineral wool, fly ash and slag waste and analyzed in accordance with ASTM method D4239 specifications or other appropriate analytical methods for the mineral wool product, fly ash and slag waste until such time that the suppliers of coke and/or slag can supply certificates of analyses for sulfur content of the input material.

- (1) For slag and coke, a once per month sample shall be taken from the charge bucket before a charge is delivered to either cupola to be analyzed for the first 12 months from the effective date of Commissioner's order. In addition, resulting mineral wool product, fly ash and slag waste representative of this charge shall be taken from the cupola to be analyzed. No additional sampling will be necessary after the first 12 months from the effective date of the Commissioner's Order, except for stack test purposes or a change in supplier or vendor of the coke and/or slag. The average sulfur content of the coke, slag, mineral wool product, fly ash and slag waste from the 12 month sampling period will be used to demonstrate compliance with the limits established herein until the next stack test is conducted as described in Section 6(b).
- (2) Any change in the supplier or vendor of the coke and/or slag, supplied to the Petitioner, would require a once per month sample taken for an additional 12 months of sampling, as described in Section 6(c)(i) with sampling beginning with the first delivery of coke from the new supplier or the date a new source of slag is approved by the Petitioner. The additional 12 months of sampling for sulfur content of the coke and/or slag, mineral wool product from the cupola and waste stream product (fly ash and slag waste) shall establish a new baseline for such material(s) to ensure that the average sulfur content of the raw materials and mineral wool product from the cupola and waste stream product (fly ash and slag waste) are able to demonstrate compliance with the limits established herein.
- (3) In the event the SO<sub>2</sub> emissions exceed either Order paragraphs 2 or 3, the Petitioner will expeditiously conduct another sample in order to determine the average sulfur content of the slag, coke and mineral wool product directly from the cupola and waste stream product (fly

ash and slag waste) respectively that was used to determine the SO<sub>2</sub> emission rate that exceeded the limit in paragraphs 2 or 3.

- ii. The petitioner will be responsible for ensuring the SO<sub>2</sub> limit in Order paragraph 2 is protected when coke or slag is burned by the Petitioner. SO<sub>2</sub> emissions will be determined by using the following calculation for the cupolas:

$$\text{SO}_2 \text{ cupola-hourly (i)} = \{ (T_{12\text{-hr shift (i)}} * EF_{\text{cupola}}) + \\ \{ [(T_{12\text{-hr shift (i)}} * EF_{\text{cupola}}) * AR_{\text{sulfurcontentslag}}] + \\ [(T_{12\text{-hr shift (i)}} * EF_{\text{cupola}}) * AR_{\text{sulfurcontentcoke}}] \} * \\ [(ST_{\text{masssulfurcontent}} - \text{MWPWS}_{\text{masssulfurcontent}}) / ST_{\text{masssulfurcontent}}] \} / \\ H_{12\text{-hr shift (i)}}$$

*Where:*

- SO<sub>2</sub> cupola-hourly (i) = Average Hourly SO<sub>2</sub> emissions from both cupolas exhausting to cupola stack #1 for 12-hr shift (lbs/hr);
- T<sub>12-hr shift (i)</sub> = Total input of coke, slag, and feldspar to the cupolas for 12-hr shift i (tons/12-hr shift);
- EF<sub>cupola</sub> = SO<sub>2</sub> Emission Factor for the cupolas (lbs/ton) exhausting to the cupola stack #1 from the most recent valid stack test;
- AR<sub>sulfurcontentslag</sub> = Adjustment ratio for difference of sulfur content of slag based on a 12 sample rolling average from charge to sulfur content of the slag during the latest stack test.
- AR<sub>sulfurcontentcoke</sub> = Adjustment ratio for difference of sulfur content of coke based on a 12 sample rolling average from charge to sulfur content of the coke during the latest stack test.
- ST<sub>masssulfurcontent</sub> = Stack test of Input Material – mass sulfur content from coke, slag, and feldspar to cupolas per unit time.
- MWPWS<sub>masssulfurcontent</sub> = Mineral Wood Product and Waste Stream – mass sulfur content from sampled end product from cupola and waste streams per unit time to represent SO<sub>2</sub> not exhausted to atmosphere
- H<sub>12-hr shift (i)</sub> = Hours of operation per 12-hr shift for each cupola

- iii. The petitioner would be responsible for ensuring the SO<sub>2</sub> limit in Order paragraph 3 is protected when the load of coke or slag is burned by the Petitioner by using the following calculation for the blow chambers exhausting to screenhouse stack #3:

$$\text{SO}_2 \text{ screenhouse-hourly (i)} = \{ (T_{12\text{-hr shift (i)}} * EF_{\text{screenhouse}}) + \\ \{ [(T_{12\text{-hr shift (i)}} * EF_{\text{screenhouse}}) * AR_{\text{sulfurcontentslag}}] + \\ [(T_{12\text{-hr shift (i)}} * EF_{\text{screenhouse}}) * AR_{\text{sulfurcontentcoke}}] \} * \\ [(ST_{\text{masssulfurcontent}} - \text{MWPWS}_{\text{masssulfurcontent}}) / ST_{\text{masssulfurcontent}}] \} / \\ H_{12\text{-hr shift (i)}}$$

*Where:*

- $SO_2$  <sub>screenhouse-hourly (i)</sub> = Average Hourly  $SO_2$  emissions from both blow chambers exhausting to screenhouse stack #3 for 12-hr shift (lbs/hr);
- $T_{12\text{-hr shift (i)}}$  = Total input of coke, slag, and feldspar to the cupolas for 12-hr shift i (tons/12-hr shift);
- $EF_{\text{screenhouse}}$  =  $SO_2$  Emission Factor for the blow chambers (lbs/ton) exhausting into the screenhouse stack #3 from the most recent valid stack test;
- $AR_{\text{sulfurcontentslag}}$  = Adjustment ratio for difference of sulfur content of slag based on a 12 sample rolling average from charge to sulfur content of the slag during the latest stack test, taking into account the sulfur content of the mineral wool product from the cupola and waste streams.
- $AR_{\text{sulfurcontentscoke}}$  = Adjustment ratio for difference of sulfur content of coke based on a 12 sample rolling average from charge to sulfur content of the coke during the latest stack test, taking into account the sulfur content of the mineral wool product from the cupola and waste streams.
- $ST_{\text{masssulfurcontent}}$  = Stack test of Input Material – mass sulfur content from coke, slag, and feldspar to cupolas per time unit
- $MWPWS_{\text{masssulfurcontent}}$  = Mineral Wood Product and Waste Streams – mass sulfur content from sampled end product from cupola and waste streams per unit time to represent  $SO_2$  not exhausted to atmosphere
- $H_{12\text{-hr shift (i)}}$  = Hours of operation per 12-hr shift for each blow chamber

1. These emissions shall be noted per each 12-hour shift data collected, per Section 6(a)(ii) and (iii) and demonstrate the  $SO_2$  emissions remain below the limits established in Order paragraphs 2 and 3.
  2. The Petitioner shall note any exceedances in the resulting  $SO_2$  emissions on the Quarterly Deviation and Compliance Monitoring Report.
- d. Recordkeeping: The Petitioner shall maintain records of the sampling and analysis of the sulfur content of the coke, slag, mineral wool product, fly ash and slag waste certifications, other documentation, and the equations used to demonstrate compliance with the emission requirements in Order paragraphs 2 and 3. These records shall be retained for a period of at least five (5) calendar years.
7. Nothing in this Order shall prohibit future revisions to the emission rates in Order paragraphs 2 and 3, including increases in such emission rates and/or limitations, provided such future revisions demonstrate continued attainment of the 1-hour  $SO_2$  NAAQS, satisfy the requirements in Section 110(l) of the Clean Air Act (42 U.S.C. §7410(l)), and any necessary revisions to the applicable regulations and SIP are obtained.
  8. This Order shall apply to and be binding upon the Petitioner, its successors and assigns. No change in ownership, corporate, or partnership status of the Petitioner shall in any way alter its status or responsibilities under this Order.

9. The requirements of this Order supersede any less stringent requirements applicable to the Petitioner.

### **EFFECTIVE DATE OF ORDER**

Pursuant to IC 13-14-2-1(d), IC 4-21.5-3-1, IC 4-21.5-3-5(a)(6), and 40 Code of Federal Regulations ("CFR") 51.102, IDEM will give notice of this Order to each entity to whom the Order is directed and affected neighbors by mailing and to the general public by web publication. Pursuant to IC 4-21.5-3-7(a)(3), IC 4-21.5-3-2(e), and IC 4-21.5-3-5, this Order may be appealed by filing a Petition for review within eighteen (18) days after the date affected persons were given notice of the Order by U.S. mail. Information on petitions for review of this Order can be found at IC 4-21.5-3-7.

Pursuant to IC 4-21.5-3-2 and IC 4-21.5-3-5(f), the Order is effective fifteen (15) days after service of this order unless a Petition for review has been filed on or before the fifteenth (15<sup>th</sup>) day. However, the compliance date for the emission limitations in this Order is March 1, 2024.

Pursuant to 40 CFR 51.103, IDEM will submit this Order to U.S. EPA as a revision to the Indiana SIP. Upon approval by the U.S. EPA, this Order will be part of the Indiana SIP. Persons seeking judicial review of this Order may do so in accordance with IC 4-21.5-5.

If you have procedural or scheduling questions regarding your request for review, you may contact the Office of Environmental Adjudication at (317) 232-8591. If you have questions regarding this Order, please contact Mark Derf, Office of Air Quality, by telephone at (317) 233-5682 or email at [MDERF@idem.IN.gov](mailto:MDERF@idem.IN.gov).

Dated at Indianapolis, Indiana this 12 day of February, 2024.



Brian Rockensuess

Commissioner

Indiana Department of Environmental Management

## COMPLIANCE AND ENFORCEMENT BRANCH

Facility: Acoustic and thermal insulation manufacturing facility  
Parameter: Average Hourly Sulfur Dioxide (SO<sub>2</sub>) Emissions  
Limit: 160.0 pounds of SO<sub>2</sub> per hour for cupola stack  
(Based on Sulfur Content: Slag-1.0% / Coke 0.7% /  
Mineral Wool Product, Slag Waste, Fly Ash %)

Page 1 of 2

YEAR:

[illegible]

\* Average Hourly SO<sub>2</sub> Emissions (lb/hr) = {Material Input (tons/month) x Emission Factor (lb SO<sub>2</sub>/ton) \* Adjustment Factor for Sulfur Content of Slag/Coke/Mineral Wool Product/Slag Waste/Fly Ash} / Hours of Operation per Month



Visit [on.IN.gov/survey](https://on.IN.gov/survey) or scan the QR code to provide feedback.

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**Part 70 Quarterly Report**  
**(Submit Report Quarterly)**

Source Name: Isolatek  
Source Address: 701 N Broadway St, Huntington 46750  
Part 70 Permit No.: T069-45112-00021

Facility: Acoustic and thermal insulation manufacturing facility  
Parameter: Average Hourly Sulfur Dioxide (SO<sub>2</sub>) Emissions  
Limit: 20.0 pounds of SO<sub>2</sub> per hour for screenhouse stack  
(Based on Sulfur Content: Slag- 1.0% / Coke- 0.7%/  
Mineral Wool Product, Slag Waste, Fly Ash %)

This form consists of 2 pages

**Average Hourly SO<sub>2</sub> Emissions (Quarterly Report)**

**Page 2 of 2**

QUARTER:

YEAR:

Emission Unit	Emission Factor (lb SO <sub>2</sub> /ton)	Month 1	Month 1	Month 1	Month 2	Month 2	Month 2	Month 3	Month 3	Month 3
		Hours of Operation per month (hrs)	Material Input (tons/month)	Average Hourly SO <sub>2</sub> Emissions (lb/hr)*	Hours of Operation per month (hrs)	Material Input (tons/month)	Average Hourly SO <sub>2</sub> Emissions (lb/hr)*	Hours of Operation per month (hrs)	Material Input (tons/month)	Average Hourly SO <sub>2</sub> Emissions (lb/hr)*
Blow Chamber EU#3										
Blow Chamber EU#4										
			<b>Month 1 =</b>			<b>Month 2 =</b>			<b>Month 3 =</b>	

\* Average Hourly SO<sub>2</sub> Emissions (lb/hr) =  $\frac{\text{Material Input (tons/month)} \times \text{Emission Factor (lb SO}_2\text{/ton)} \times \text{Adjustment Factor for Sulfur Content of Slag/Coke/Mineral Wool Product/Slag Waste/Fly Ash}}{\text{Hours of Operation per Month}}$



# **APPENDIX A1**

**ISOLATEK INTERNATIONAL REQUEST  
FOR COMMISSIONER'S ORDER**

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January 3, 2024

**Via E-mail only**

Matthew Stuckey  
Assistant Commissioner, Office of Air Quality  
Indiana Department of Environmental Management  
100 N. Senate Ave, Room 1003  
Indianapolis, Indiana 46204

Re: Isolatek Request for a Commissioner's Order to Address the 2010 1-hour SO<sub>2</sub>  
National Ambient Air Quality Standard

Dear Mr. Stuckey:

USMPC Buyer d/b/a Isolatek International ("Isolatek") owns and operates a stationary acoustic and thermal insulation manufacturing facility with Source I.D. Number 069-00021, located at 701 North Broadway Street in Huntington, Huntington County, Indiana (the "Facility") and permitted under the Part 70 air operating permit program. Isolatek charges a mixture of fuel (coke), slag from smelting in cupolas at integrated steel mills, and other feed material (e.g., feldspar). The charged mixture is heated to a molten state and processed to form mineral wool for production of thermal or acoustical insulation material.

By letter dated October 3, 2023, Isolatek requested a Commissioner's Order to be issued for the Facility to establish SO<sub>2</sub> emission limits applicable to Cupolas EU #1 and EU #2 exhausting through stack #1 and blow chambers EU #3 and EU #4 exhausting to screen houses CE #3 and CE #4 and then to a single stack #3. A Commissioner's Order was subsequently issued and signed and dated November 6, 2023. Isolatek requests a new Commissioner's Order to supersede and replace the existing Commissioner's Order to take into account certain modifications for sampling and analysis requirements. In all other respects, the requests in the October 3, 2023 Isolatek request letter remain operative.

We appreciate the cooperation of your office in this matter and look forward to receipt of the new Commissioner's Order and a resolution to this matter.

Sincerely,



Raj Jonnalagadda  
Global Vice President Operations and Engineering

cc: Scott Deloney, IDEM-OAQ via e-mail  
Mark Derf, IDEM-OAQ via e-mail

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# **Attachment B**

## **PUBLIC PROCESS PARTICIPATION DOCUMENTATION**

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## **LEGAL NOTICE OF PUBLIC HEARING**

### ***Commissioner's Order No. 2023-Air-02 for U.S. Mineral Products Company, D/B/A Isolatek International, in Huntington, Huntington County, Indiana***

**Note:** Legal notices for public hearings are no longer published in newspapers, but can be found on the Indiana Department of Environmental Management's web site at: [IDEM: Public Notices: Northeast Indiana](#)

Notice is hereby given under 40 Code of Federal Regulations (CFR) 51.102 that the Indiana Department of Environmental Management (IDEM) is accepting written comment and providing an opportunity for a public hearing regarding *Commissioner's Order No. 2023-Air-02 for U.S. Mineral Products Company, D/B/A Isolatek International, in Huntington, Huntington County, Indiana*. All interested persons are invited and will be given reasonable opportunity to express their views concerning this submittal.

On November 6, 2023, Indiana submitted to United States Environmental Protection Agency (U.S. EPA) a State Implementation Plan (SIP) for the "*Attainment Demonstration and Technical Support Document for the Huntington, Indiana 2010 Primary 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Nonattainment Area and Commissioner's Order No. 2023-Air-01 for Isolatek.*" **The purpose of this notice is to solicit public comment on Commissioner's Order 2023-Air-02 for U.S. Mineral Products Company, D/B/A Isolatek International, in Huntington, Huntington County, Indiana. This Commissioner's Order amends and will replace Commissioner's Order 2023-Air 01, approved and signed on November 6, 2023.**

The draft document will be available for review on or before January 10, 2024, on the following web page:

- [IDEM: State Implementation Plans: Sulfur Dioxide \(SO<sub>2</sub>\) Attainment Demonstrations](#)

Copies of the draft document will also be made available on or before January 10, 2024, to any person upon request at the following locations:

- Huntington City-Township Public Library, 255 W. Park Drive, Huntington, IN 46750
- IDEM Office of Air Quality, Indiana Government Center North, 100 North Senate Avenue, Room N1003, Indianapolis, IN 46204-2251

Any person may submit written comments on *Commissioner's Order No. 2023-Air-02 for U.S. Mineral Products Company, D/B/A Isolatek International, in Huntington, Huntington County, Indiana*. Written comments should be directed to: Mark Derf via U.S. Mail at IDEM Office of Air Quality, Room N1003, 100 North Senate Avenue, Indianapolis, IN 46204-2251; fax at (317) 233-5967; or email at [mderf@idem.IN.gov](mailto:mderf@idem.IN.gov).

Written comments must be submitted by February 9, 2024. Please refer to *Commissioner's Order No. 2023-Air-02* in all correspondence.

A public hearing on *Commissioner's Order No. 2023-Air-02 for U.S. Mineral Products Company, D/B/A Isolatek International, in Huntington, Huntington County, Indiana* will be held if a request is received by February 9, 2024. If a hearing is requested, the hearing will be held on February 13, 2024, and the comment period will be extended to February 14, 2024. If held, the hearing will convene at 6:00 p.m. local time at the Huntington City-Township Public Library, 255 W. Park Drive, Huntington, IN 46750. Interested parties may present oral or written comments at the public hearing if it is held. If a hearing is held, oral statements will be heard, but for the accuracy of the record, a written copy of the statements should be submitted. If a request for a public hearing is not received by February 9, 2024, the public hearing will be cancelled.

Interested parties can check the online IDEM calendar at [IDEM Calendar - State of Indiana](#) or contact Mark Derf via email at [mderf@idem.IN.gov](mailto:mderf@idem.IN.gov) or phone at (317) 233-5682 (direct) or (800) 451-6027 (toll free in Indiana) after February 9, 2024, to see if the public hearing has been cancelled.

If a public hearing is held, a transcript of the public hearing and all written submissions provided as part of the public hearing shall be open to public inspection at IDEM, and copies may be made available to any person upon payment of reproduction costs. Any person heard or represented at the hearing or requesting notice shall be given written notice of actions resulting from the hearing.

For additional information, contact Mark Derf via U.S. Mail at IDEM, Office of Air Quality, Room N1003, Indiana Government Center North, 100 North Senate Avenue, Indianapolis, IN 46204; e-mail at [mderf@idem.IN.gov](mailto:mderf@idem.IN.gov) or telephone at (317) 233-5682 (direct) or (800) 451-6027 (toll free in Indiana).

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*Speech and hearing impaired callers may contact the agency via the Indiana Relay Service at 1-800-743-3333. Individuals requiring reasonable accommodations for participation in this hearing should contact the IDEM Americans with Disabilities Act (ADA) coordinator at: Attn: ADA Coordinator, Indiana Department of Environmental Management – Mail Code 50-10, 100 North Senate Avenue, Indianapolis, IN 46204-2251, or call (317) 233-1785 (voice) or (317) 233-6565 (TDD). Please provide a minimum of 72 hours notification.*





## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
*Governor*

**Brian C. Rockensuess**  
*Commissioner*

January 25, 2024

### CERTIFICATE OF PUBLICATION

This is to certify that the Indiana Department of Environmental Management (IDEM) Notice of the opportunity for a Public Hearing regarding the following:

- Draft Commissioner's Order No. 2023-Air-02 for U.S. Mineral Products Company, D/B/A Isolatek International, in Huntington, Huntington County, Indiana

was published on IDEM's web site on or before January 10, 2024. It is expected that it will remain posted on the site until at least February 10, 2024.

The notice in full was available online at the following web address, under "Northeast Indiana/Huntington County":

<https://www.in.gov/idem/public-notices/public-notices-northeast-indiana/>

The draft document was posted on or before January 10, 2024, at the following web address under "2010 Primary 1-Hour SO<sub>2</sub> Standard/Huntington County":

<https://www.in.gov/idem/sips/attainment-demonstrations/sulfur-dioxide-so2-attainment-demonstrations/>

Web publication of the notice was at the request of Scott Deloney, Branch Chief, Programs Branch, Office of Air Quality, IDEM.

By:

Kevin Bump  
IDEM Webmaster

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