INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

December 08, 2004

TO: Interested Parties / Applicant

RE: Plymouth Tube Company / 131-19329-00014

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03

December 08, 2004

Mr. Jeff Fisher
Plymouth Tube Company
572 W. State Road 14
Winamac, Indiana 46996

Re: 131-19329-00014
Fourth Notice Only Change
MSOP 131-7690-00014

Dear Mr. Fisher:

Plymouth Tube Company plant located at 504 North Keller Avenue, Winamac, Indiana was issued a New Source Construction and Minor Source Operating permit on July 31, 2001, for a seemless steel pipe and tube production operation. A letter from Bruce Carter Associates, L.L.C., requesting the following changes was received on June 30, 2004.

The products of combustion from the three (3) natural gas-fired annealing furnaces identified as EU01A-3, EU01A-2 and EU01A-1 are going to be redirected through stacks D22, C19, and B13 respectively. The products are currently vented inside the facility, however their emissions have been accounted for in the existing permit. The annealing chambers will not be redirected and will still vent out of stacks F, G, H, C, D, E, P and AD as identified in the original MSOP (131-7690-00014). The redirecting of the vents will not increase emissions as no changes are taking place to the furnaces.

Additionally the one (1) Weld Mill identified as EU01B has been shut down. The following emissions units relating to this process have been removed:

1) One (1) natural gas-fired annealing furnace identified as EU01B-West.
2) One (1) natural gas-fired annealing furnace identified as EU01B-East.
3) The four (4) related flame curtains noted in A.2(b)(5) of the permit.

The four (4) natural gas-fired heaters, EU01B-T1 through T4 exhausting to stacks ST1 through ST4 and the one (1) natural gas-fired unit heater, known as EU01B-V exhausted to stack V will remain in operation.

All other conditions of the permit shall remain unchanged and in effect. Attached is a revised copy of the entire MSOP with the revisions from this Notice Only Change included.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Walter Habeeb, of my staff, at 317-232-8422 or 1-800-451-6027, and ask for extension 2-8422.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

WH
Attachment: Revised Permit
cc: File - Pulaski County
Pulaski County Health Department
Air Compliance Section - Wanda P. Stanfield
Bruce Carter Associates, L.L.C.

MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Plymouth Tube Company
572 W. State Road 14
Winamac, Indiana 46996

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units 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 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 131-7690-00014	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 31, 2001 Expiration Date: July 31, 2006

First Notice Only Change No.: 131-15169-00014, issued December 7, 2001
Second Notice Only Change No.: 131-15336-00014, issued April 10, 2002
Third Notice Only Change No.:131-15951-00014, issued May 9, 2002

Fourth Notice Only Change No: 131-19329-00014	Pages Affected: 4,5 and 16
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 08, 2004

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Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]
D.2.2 Record Keeping Requirements

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 are 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 seemless steel pipe and tube production source.

Authorized Individual:	Jeff Fisher
Source Address:	572 W. State Road 14, Winamac, Indiana 46996
Mailing Address:	572 W. State Road 14, Winamac, IN 46996
Phone Number:	574-946-3125
SIC Code:	3317
County Location:	Pulaski
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) Cold Draw, known as EU01A, consisting of the following equipment:

(1) One (1) natural gas-fired annealing furnace rated at 8.28 MMBtu per hour, known as EU01A-3, installed in September 1988, exhausting to stack D22 with annealing chamber exhausted to stacks F, G, and H, capacity: 5.0 tons per hour of steel.

(2) One (1) natural gas-fired annealing furnace rated at 9.54 MMBtu per hour, known as EU01A-2, installed in September 1988, exhausted to stack C19 with annealing chamber exhausted to stacks C, D, and E, capacity: 7.5 tons per hour of steel.

(3) One (1) natural gas-fired boiler, known as EU01A-Boiler 2, constructed in 1988, exhausting to stack EU01A-U, rated at 7.0 million British thermal units per hour.

(4) One (1) natural gas-fired tank heater, known as EU01A-Z, constructed in February 1988, exhausting to the general facility, rated at 2.5 million British thermal units per hour, total.

(5) One (1) natural gas-fired annealing furnace rated at 4.80 MMBtu per hour, known as EU01A-#1, installed in 1961, exhausted to stack B13 with annealing chamber exhausted to stacks P and AB, capacity: 13.0 tons per hour of steel.

(6) One (1) Micro-HN process boiler, known as EU01A-HN, installed in 2000, exhausted into the oxygen free tube curing process, rated at 11.6 million British thermal units per hour.

(7) Six (6) flame curtains, installed in 2000, rated at 0.264 million British thermal units

per hour.

(b) One (1) area, known as EU01B, consisting of the following equipment:

(1) Four (4) natural gas-fired unit heaters, known as EU01B-T1 through T4, installed in 1994, exhausted through stacks ST1 through ST4, respectively, rated at 1.60 million British thermal units per hour, total.

(2) One (1) natural gas-fired unit heater, known as EU01B-V, installed in 1972, exhausted through stack V, rated at 1.875 million British thermal units per hour.

(c) One (1) Hot Mill, known as EU01C, consisting of the following equipment:

(1) One (1) natural gas-fired billet heating furnace, known as EU01C-Billet Furnace, constructed in June 1988, exhausting to stack L and roof exhaust fan C9, rated at 30.0 million British thermal units per hour (modified from 26.0 million British thermal units per hour), capacity: 14.0 tons per hour of steel.

(2) One (1) natural gas-fired annealing furnace, known as EU01C-Annealing Furnace, constructed in June 1991, exhausting to stacks F, G, H, and roof exhaust fan C8, rated at 44.8 million British thermal units per hour, capacity: 9.0 tons per hour of steel.

(3) Two (2) natural gas-fired boilers, known as EU01C-Boiler 1 and EU01C-Boiler 2, constructed in August 1990, exhausting to stacks EU01C-M1 and EU01C-M2, respectively, rated at 7.0 million British thermal units per hour, each.

(4) Twenty-three (23) natural gas-fired unit heaters, known as EU01C-P1 through P12, EU01C-R1 through R6, EU01C-S1 and S2, EU01C-T1 and T2, and EU01C-U installed in 1994, rated at 6.95 million British thermal units per hour, total.

(f) One (1) natural gas-fired emergency generator, exhausted through stack GEN-1, rated at 0.649 million British thermal units per hour.

(g) Two (2) metal inert gas (MIG) welding stations (for maintenance only).

(h) Six (6) stick welding stations (for maintenance only).

(i) Oxyacetylene flame-cutting (for maintenance only).

(j) One (1) gasoline storage tank, capacity: 250 gallons, throughput: 858 gallons per year.

(k) Two (2) diesel oil storage tanks, capacity: 250 gallons, each, throughput: 3,632 gallons per year, total.

(l) One (1) kerosene storage tank, capacity: 250 gallon, throughput: 450 gallons per year.

(m) Machining where an aqueous cutting coolant continuously floods the machining interface, using Emulsiplex Soluble Oil at 0.3 pounds per hour, capacity 38,250 pounds of steel per hour.

(n) One (1) quarter mile unpaved stone road, supporting a maximum gross vehicle weight of

thirty-five (35) tons of 18 wheel flatbed semi trailers, one (1) fork lift, and three (3) side loaders, a maximum of three (3) round trips per day, and a speed limit of five (5) miles per hour.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operating permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Minor Source Operating Permit [326 IAC 2-6.1]

(a) This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1.

(b) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(c) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in this permit. If IDEM, OAQ, upon receiving a timely and complete 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. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.6 Permit Term [326 IAC 2-6.1-7]

This permit is issued for a fixed term of five (5) years from the original date, 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.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of CO and NOx is less than two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit PM_{10}, SO_2, VOC, NO_X or CO to 100 tons per year from this source, shall cause this source to be considered a major source under 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

(c) Any change or modification which may increase potential to emit to two hundred fifty (250) tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-7]

Any change or modification which may increase potential to emit to ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.3 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 (PMP) after issuance of this permit, including the following information on each emissions unit:

(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;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.4 Permit Revision [326 IAC 2-5.1-3(e)(3)] [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 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.5 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

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 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.6 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to 326 IAC 2-6.1-6(d)(3):

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.7 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to 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.8 Opacity [326 IAC 5-1]

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:

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

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

C.9 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). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

(a) Compliance testing on new emissions units shall be conducted within sixty (60) days after achieving maximum production rate, but no later than one hundred eighty (180) days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the

initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

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

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

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.14 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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.15 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall 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 facility or emission control equipment occurs which lasts more

than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

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

(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.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(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) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of

this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted 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) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) Cold Draw, known as EU01A, consisting of the following equipment:

(1) One (1) natural gas-fired annealing furnace rated at 8.28 MMBtu per hour, known as EU01A-3, installed in September 1988, exhausting to stack D22 with annealing chamber exhausted to stacks F, G, and H, capacity: 5.0 tons per hour of steel.

(2) One (1) natural gas-fired annealing furnace rated at 9.54 MMBtu per hour, known as EU01A-2, installed in September 1988, exhausted to stack C19 with annealing chamber exhausted to stacks C, D, and E, capacity: 7.5 tons per hour of steel.

(3) One (1) natural gas-fired boiler, known as EU01A-Boiler 2, constructed in 1988, exhausting to stack EU01A-U rated at 7.0 million British thermal units per hour .

(4) One (1) natural gas-fired tank heater, known as EU01A-Z constructed in February 1988, exhausting to the general facility, rated at 2.5 million British thermal units per hour, total.

(5) One (1) natural gas-fired annealing furnace rated at 4.80 MMBtu per hour, known as EU01A-#1, installed in 1961, exhausted to stack B13 with annealing chamber exhausted to stacks P and AB, capacity: 13.0 tons per hour of steel.

(6) One (1) Micro-HN process boiler, known as EU01A-HN, installed in 2000, exhausted into the oxygen free tube curing process, rated at 11.6 million British thermal units per hour.

(7) Six (6) flame curtains, installed in 2000, rated at 0.264 million British thermal units per hour.

(b) One (1) area, known as EU01B, consisting of the following equipment:

(1) Four (4) natural gas-fired unit heaters, known as EU01B-T1 through T4, installed in 1994, exhausted through stacks ST1 through ST4, respectively, rated at 1.60 million British thermal units per hour, total.

(2) One (1) natural gas-fired unit heater, known as EU01B-V, installed in 1972, exhausted through stack V, rated at 1.875 million British thermal units per hour.

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

Emissions Unit Description:

(c) One (1) Hot Mill, known as EU01C, consisting of the following equipment:

(1) One (1) natural gas-fired billet heating furnace, known as EU01C-Billet Furnace, constructed in June 1988, exhausting to stack L and roof exhaust fan C9, rated at 30.0 million British thermal units per hour (modified from 26.0 million British thermal units per hour), capacity: 14.0 tons per hour of steel.

(2) One (1) natural gas-fired annealing furnace, known as EU01C-Annealing Furnace, constructed in June 1991, exhausting to stacks F, G, H, and roof exhaust fan C8, rated at 44.8 million British thermal units per hour, capacity: 9.0 tons per hour of steel.

(3) Two (2) natural gas-fired boilers, known as EU01C-Boiler 1 and EU01C-Boiler 2, constructed in August 1990, exhausting to stacks EU01C-M1 and EU01C-M2, respectively, rated at 7.0 million British thermal units per hour, each.

(4) Twenty-three (23) natural gas-fired unit heaters, known as EU01C-P1 through P12, EU01C-R1 through R6, EU01C-S1 and S2, EU01C-T1 and T2, and EU01C-U installed in 1994, rated at 6.95 million British thermal units per hour, total.

(g) Two (2) metal inert gas (MIG) welding stations (for maintenance only).

(h) Six (6) stick welding stations (for maintenance only).

(i) Oxyacetylene flame-cutting (for maintenance only).

(j) One (1) gasoline storage tank, capacity: 250 gallons, throughput: 858 gallons per year.

(k) Two (2) diesel oil storage tanks, capacity: 250 gallons, each, throughput: 3,632 gallons per year, total.

(l) One (1) kerosene storage tank, capacity: 250 gallon, throughput: 450 gallons per year.

(m) Machining where an aqueous cutting coolant continuously floods the machining interface, using Emulsiplex Soluble Oil at 0.3 pounds per hour, capacity 38,250 pounds of steel per hour.

(n) One (1) quarter mile unpaved stone road, supporting a maximum gross vehicle weight of thirty-five (35) tons of 18 wheel flatbed semi trailers, one (1) fork lift, and three (3) side loaders, a maximum of three (3) round trips per day, and a speed limit of five (5) miles per hour.

(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(1)]

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-4, the PM emissions from EU01A-Boiler 2, shall not exceed 0.571 pounds per million British thermal units.

(b) Pursuant to 326 IAC 6-2-4, the PM emissions from EU01A-HN, shall not exceed 0.425 pounds per million British thermal units.

(c) Pursuant to 326 IAC 6-2-4, the PM emissions from EU01C-Boiler 1 and EU01C-Boiler 2, shall not exceed 0.467 pounds per million British thermal units.

The limits stated above were based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

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

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

These limits will also make the requirements of 326 IAC 2-2 not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the maintenance welding and flame cutting operations shall be limited by the following equation:

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

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

D.1.3 CO and NO_X Emissions

Any change or modification which may increase potential to emit CO and/or NO_X from the entire source to one hundred (100) tons per year or more shall require approval from IDEM, OAQ prior to making the change.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11]

There are no specific Compliance Determination Requirements applicable to these emission units.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements [40CFR 60.48c, NSPS Subpart Dc]

(a) The Permittee shall maintain monthly records of the amount and type of fuel burned in the EU01A-HN pursuant to 40 CFR 60.48c, Subpart Dc.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Natural Gas Fired Boiler Certification

A semi-annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(f) One (1) natural gas-fired emergency generator, exhausted through stack GEN-1, rated at 0.649 million British thermal units per hour.

(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(1)]

D.2.1 Operation Limitation

Pursuant to the definition of emergency generators, operation of the one (1) generator, identified as GEN-1, shall be limited to an annual total of 500 hours.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.2 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records of the following:

(1) The hours of operation of each emergency generator;

(2) Records of the annual fuel usage of the emergency generator.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

MINOR SOURCE OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS-FIRED BOILER CERTIFICATION

Source Name: Plymouth Tube Company
Source Address: 572 W. State Road 14, Winamac, Indiana 46996
Mailing Address: 572 W. State Road 14, Winamac, Indiana 46996
Permit No.: MSOP 131-7690-00014

Natural Gas Only Alternate Fuel burned From: _____ To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

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

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

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

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

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

COMPANY: Plymouth Tube Company PHONE NO. :_____
LOCATION: (CITY AND COUNTY) Winamac, IN Pulaski County
PERMIT NO. 131-7690 AFS PLANT ID: 131-00014 AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

_____

_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Plymouth Tube Company**
Address:	**572 W. State Road 14**
City:	**Winamac, Indiana 46996**
Phone #:	**574-946-3125**
MSOP #:	**131-7690-00014**

I hereby certify that Plymouth Tube Company is still in operation.
no longer in operation.

I hereby certify that Plymouth Tube Company is
in compliance with the requirements of MSOP 131-7690-00014.
not in compliance with the requirements of MSOP 131-7690-00014.

Authorized Individual (typed):	**Jeff Fisher**
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:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Notice Only Change to a
Minor Source Operating Permit

Source Background and Description

Source Name:	**Plymouth Tube Company**
Source Location:	**504 North Keller Avenue, Winamac, Indiana 46996**
County:	**Pulaski**
SIC Code:	**3317**
Operation Permit No.:	**MSOP 131-7690-00014**
Issuance Date:	**July 31, 2001**
Notice of Change:	**131-19329-00014**
Permit Reviewer:	**Walter Habeeb**

History

The Office of Air Quality (OAQ) has reviewed an application from the Plymouth Tube Company relating to the modification of their seemless steel pipe and tube production source. The source is cu rrently permitted under a Minor Source Operating Permit, issued on July 31, 2001.

The source proposes the following changes:

The products of combustion from the three (3) natural gas-fired annealing furnaces identified as EU01A-3, EU01A-2 and EU01A-1 are going to be redirected through stacks D22, C19, and B13 respectively (these stacks have not been built yet). The products are currently vented inside the facility, however their emissions have been accounted for in the existing permit. The annealing chambers will not be redirected and will still vent out of stacks F, G, H, C, D, E, P and AD as identified in the original MSOP (131-7690-00014). The redirecting of the vents will not increase emissions as no changes are taking place to the furnaces.

Additionally , with the exception of the unit heaters list below, the one (1) Weld Mill identified as EU01B has been shut down. The following emissions units relating to this process have been removed:

1) One (1) natural gas-fired annealing furnace identified as EU01B-West.
2) One (1) natural gas-fired annealing furnace identified as EU01B-East.
3) The four (4) related flame curtains noted in A.2(b)(5) of the permit.

The four (4) natural gas-fired unit heaters, EU01B-T1 through T4 exhausting to stacks ST1 through ST4 and the one (1) natural gas-fired unit heater, known as EU01B-V exhausted to stack V will remain in operation.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units at this source.

New Emission Units

There are no new emission units at the source.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
Cold Draw					
EU01A-C	#11 Annealing Furnace	40.83	1.50	900	260
EU01A-D	#11 Annealing Furnace	40.83	2.67	16,495	77
EU01A-E	#11 Annealing Furnace	40.83	1.50	900	230
EU01A-F	#10 Annealing Furnace	36.33	2.00	1,500	165
EU01A-G	#10 Annealing Furnace	36.33	2.67	16,495	77
EU01A-H	#10 Annealing Furnace	36.33	2.00	1,500	330
EU01A-P	#1 Annealing Furnace	30.0	1.50	2,000	165
EU01A-AB	#1 Annealing Furnace	30.0	2.60	12,125	77
EU01A-T	Boiler 1 (removed 3/00)	30.83	2.00	440	350
EU01A-U	Boiler 2 (removed 3/00)	21.0	2.00	600	280
EU01A-S1	Roof Exhaust Fan	44.25	5.00	43,000	77
EU01A-S2	Roof Exhaust Fan	44.25	5.00	43,000	77
EU01A-V	Roof Exhaust Fan	44.83	5.00	43,000	77
EU01A-W1	Roof Exhaust Fan	44.83	5.00	52,500	77
EU01A-W2	Roof Exhaust Fan	44.83	5.00	52,500	77
EU01A-W3	Roof Exhaust Fan	36.33	5.00	52,500	77
EU01A-W4	Roof Exhaust Fan	36.33	5.00	52,500	77
EU01A-X	Roof Exhaust Fan	44.83	5.00	43,000	77
D22	EU01A-3 Annealing Furnace	to be determined	to be determined	to be determined	to be determined
C19	EU01A-2 Annealing Furnace	“ ”	“ ”	“ ”	“ ”
B13	EU01A-3 Annealing Furnace	“ ”	“ ”	“ ”	“ ”
Weld Mill					
EU01BST1-ST4	Four(4) Unit Heaters	30.0	0.67	unk	unk

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
EU01B-L	Roof Exhaust Fan	20.75	4.00	32,000	77
EU01B-N	Open Exhaust Fan	14.0	2.00	unk	unk
EU01B-P	Open Exhaust Fan	14.0	2.00	unk	unk
EU01B-V	1.875 MMBtu/hr NG Heater	24.0	0.83	unk	unk
Hot Mill					
EU01C-C1 - C7	Seven (7) Roof Exhaust Fans	33.0	5.00	43,000	77
EU01C-C8	Annealing Furnace	33.0	5.00	43,000	77
EU01C-C9	Billet Furnace	33.0	5.00	43,000	77
EU01C-E	Roof Exhaust Fan	33.0	4.00	32,000	77
EU01C-F	Annealing Furnace	45.5	2.50	1,440	330
EU01C-G	Annealing Furnace	45.5	2.67	1,300	330
EU01C-H	Annealing Furnace	45.5	2.00	1,300	330
EU01C-L	Billet Furnace	45.67	2.50	15,940	400
EU01C-M1	Boiler 1	20.67	1.67	600	280
EU01C-M2	Boiler 2	20.67	1.67	600	280
EU01C-P1 - P12	Twelve (12) Unit Heaters	2@ 14.0 10@ 24.0	2@ 0.33 10@ 0.50	unk	unk
EU01C-R1 - R6	Six (8) Unit Heaters	32.0	0.50	unk	unk
EU01C-S1 and S2	Two (2) Unit Heaters	32.0 32.0	0.50 0.33	unk	unk
EU01C-T1 and T2	Two (2) Unit Heaters	32.0	0.33	unk	unk
EU01C-U	Unit Heater	28.0	0.33	unk	unk
GEN-1	Emergency Generator	44.83	0.208	unk	unk

Enforcement Issue

There are no enforcement issues at this time.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 30, 2004, with additional information received on July 20, 2004.

Emission Calculations

See page 1 of 1 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	**Potential To Emit** (tons/year)
PM	1.91
PM_{10}	5.17
SO_2	0.39
VOC	3.59
CO	55.45
NO_X	65.33

HAPs	**Potential To Emit** (tons/year)
Benzene	0.001
Dichlorobenzene	0.0008
Formaldehyde	0.050
Hexane	0.970
Toluene	0.002
Lead	0.0003
Cadmium	0.0005
Chromium	0.0005
Manganese	0.0003
Nickel	0.001
TOTAL	1.03

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of NO_X is equal to or greater than 25 tons per year, but less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPS is less than or equal to twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPS**
EU01A Cold Draw (except for boilers)	0.211	0.846	0.066	0.612	10.2	11.13	0.276
EU01A-Boiler 1 & EU01A-Boiler 2	0.100	0.399	0.032	0.289	4.42	5.26	0.116
EU01A-HN	0.096	0.386	0.031	0.279	4.27	5.08	0.068
EU01B Weld Mill	0.0289	0.1157	0.0091	0.0837	1.279	1.53	0.030
EU01C Hot Mill (except for boilers)	0.681	2.72	0.215	1.97	30.1	35.74	0.427
EU01C-Boiler 1 & EU01C-Boiler 2	0.117	0.466	0.037	0.337	5.15	6.13	0.116
Emergency Generator	0.002	0.002	0.000	0.019	0.0647	0.461	0.000
Unpaved Roads	0.671	0.235	0.000	0.000	0.000	0.000	0.000
Total Emissions	1.91	5.17	0.390	3.59	55.45	65.33	1.03

County Attainment Status

The source is located in Pulaski County.

Pollutant	**Status**

PM	attainment
PM_{10}	attainment
SO_2	attainment
NOx	attainment
1 hour Ozone	attainment
8 hour Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone 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 emissions and NOx are considered when evaluating the rule applicability relating to the ozone standards. Pulaski County has been designated as attainment or unclassifiable for the ozone standards. Therefore, VOC emissions and NOx and were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(b) Pulaski County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	**Emissions** (ton/yr)
PM	1.91
PM_{10}	5.18
SO_2	0.39
VOC	3.59
CO	55.45
NO_X	65.33
Single HAP	0.97

Combination HAPS	1.03

This existing source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

This source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than one hundred (100) tons per year,

(b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and

(c) any combination of HAPS is less than twenty-five (25) tons/year.

Federal Rule Applicability

There are no changes as a result of this Notice Only Change that effect any Federal Rules that have been applied to this permit.

State Rule Applicability - Entire Source and Individual Facilities

There are no any changes as a result of this Notice Only Change that effect any State Rules that have been applied to this permit.

Changes Proposed

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) Cold Draw, known as EU01A, consisting of the following equipment:

(1) One (1) natural gas-fired annealing furnace **rated at 8.28 MMBtu per hour**, known as EU01A-3, installed in September 1988, **exhausting to stack D22 with annealing chamber** exhausted to stacks K, M, and N, ~~rated at 8.28 million British thermal units per hour~~, capacity: 5.0 tons per hour of steel.

(2) One (1) natural gas-fired annealing furnace **rated at 9.54 MMBtu per hour,** known as EU01A-2, installed in September 1988, **exhausting to stack C19 with annealing chamber** exhausted to stacks F, G, and H, ~~rated at 9.54 million British thermal units per hour~~, capacity: 7.5 tons per hour of steel.

(3) One (1) natural gas-fired boiler, known as EU01A-Boiler 2, constructed in 1988, exhausting to stack EU01A-U, rated at 7.0 million British thermal units per hour.

(4) One (1) natural gas-fired tank heater, known as EU01A-Z, constructed in February 1988, exhausting to the general facility, rated at 2.5 million British thermal units per hour, total.

(5) One (1) natural gas-fired annealing furnace **rated at 4.80 MMBtu per hour**, known as EU01A-#1, installed in 1961, **exhausting to stack B13 with annealing chambe**r exhausted to stacks P and AB, ~~rated at 4.8 million British thermal units per hour~~, capacity: 3.0 tons per hour of steel.

(6) One (1) Micro-HN process boiler, known as EU01A-HN, installed in 2000, exhausted into the oxygen free tube curing process, rated at 11.6 million British thermal units per hour.

(7) Six (6) flame curtains, installed in 2000, rated at 0.264 million British thermal units per hour.

(b) One (1) **area** ~~Weld Mill~~, known as EU01B, consisting of the following equipment:

~~(1) One (1) natural gas-fired annealing furnace, known as EU01B-West, constructed in 1972, exhausting to stacks A, B, C, D, and E, rated at 17.1 million British thermal units per hour, capacity: 7.5 tons per hour of steel.~~

(~~2~~ **1**) Four (4) natural gas-fired unit heaters, known as EU01B-T1 through T4, installed in 1994, exhausted through stacks ST1 through ST4, respectively, rated at 1.60 million British thermal units per hour, total.

(~~3~~ **2**) One (1) natural gas-fired unit heater, known as EU01B-V, installed in 1972, exhausted through stack V, rated at 1.875 million British thermal units per hour.

~~(4) One (1) natural gas-fired annealing furnace, known as EU01B-East, constructed in 1988, exhausting to stacks K, R, and J, rated at 5.70 million British thermal units per hour, capacity: 7.5 tons per hour of steel.~~

~~(5) Four (4) flame curtains, installed in 2000, rated at 0.176 million British thermal units per hour~~.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) Cold Draw, known as EU01A, consisting of the following equipment:

(1) One (1) natural gas-fired annealing furnace **rated at 8.28 MMBtu per hour**, known as EU01A-3, installed in September 1988, **exhausting to stack D22 with annealing chamber** exhausted to stacks K, M, and N, ~~rated at 8.28 million British thermal units per hour~~, capacity: 5.0 tons per hour of steel.

(2) One (1) natural gas-fired annealing furnace **rated at 9.54 MMBtu per hour,** known as EU01A-2, installed in September 1988, **exhausting to stack C19 with annealing chamber** exhausted to stacks F, G, and H, ~~rated at 9.54 million British thermal units per hour~~, capacity: 7.5 tons per hour of steel.

(3) One (1) natural gas-fired boiler, known as EU01A-Boiler 2, constructed in 1988, exhausting to stack EU01A-U rated at 7.0 million British thermal units per hour .

(4) One (1) natural gas-fired tank heater, known as EU01A-Z constructed in February 1988, exhausting to the general facility, rated at 2.5 million British thermal units per hour, total.

(5) One (1) natural gas-fired annealing furnace **rated at 4.80 MMBtu per hour**, known as EU01A-#1, installed in 1961, **exhausting to stack B13 with annealing chambe**r exhausted to stacks P and AB, ~~rated at 4.8 million British thermal units per hour~~, capacity: 3.0 tons per hour of steel.

(6) One (1) Micro-HN process boiler, known as EU01A-HN, installed in 2000, exhausted into the oxygen free tube curing process, rated at 11.6 million British thermal units per hour.

(7) Six (6) flame curtains, installed in 2000, rated at 0.264 million British thermal units per hour.

(b) One (1) **area** ~~Weld Mill~~, known as EU01B, consisting of the following equipment:

~~(1) One (1) natural gas-fired annealing furnace, known as EU01B-West, constructed in 1972, exhausting to stacks A, B, C, D, and E, rated at 17.1 million British thermal units per hour, capacity: 7.5 tons per hour of steel.~~

~~(2) Four (4) natural gas-fired unit heaters, known as EU01B-T1 through T4, installed in 1994, exhausted through stacks ST1 through ST4, respectively, rated at 1.60 million British thermal units per hour, total.~~

(~~3~~ **1**) One (1) natural gas-fired unit heater, known as EU01B-V, installed in 1972, exhausted through stack V, rated at 1.875 million British thermal units per hour.

(~~4~~ **2**) One (1) natural gas-fired annealing furnace, known as EU01B-East, constructed in 1988, exhausting to stacks K, R, and J, rated at 5.70 million British thermal units per hour, capacity: 7.5 tons per hour of steel.

~~(5) Four (4) flame curtains, installed in 2000, rated at 0.176 million British thermal units per hour~~.

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

Conclusion

The operation of this seemless steel pipe and tube production source shall be subject to the conditions of the attached proposed Notice Only Change 131-19329-00014.

Appendix A - Total Potential Emissions

Company Name: Plymouth Tube Company
Address City IN Zip: 572 West State Road 14, Winamac, Indiana 46996
Permit No.: 131-19329
Plt ID: No 00014
Reviewer: Walter Habeeb
Date: July 15, 2004

EU01A Cold Draw		**PM**	**PM_{10}**	**SO_2**	**NOx**	**VOC**	**CO**
3 Anneal Furnace	8.28 MMBtu/hr	0.0689	0.276	0.0218	3.63	0.199	3.05
2 Anneal Furnace	9.54 MMBtu/hr	0.0794	0.318	0.0251	4.18	0.230	3.51
1 Anneal Furnace	4.80 MMBtu/hr	0.0399	0.160	0.0126	2.10	0.116	1.77
Boiler 1 (backup)	7.0 MMBtu/hr	0.0583	0.233	0.0184	3.07	0.169	2.58
Boiler 2	5.0 MMBtu/hr	0.0416	0.166	0.0131	2.19	0.120	1.84
Unit Heaters(Z,AA)	2.50 MMBtu/hr	0.0208	0.0832	0.00657	1.10	0.0602	0.92
Micro-HN Boiler	11.6 MMBtu/hr	0.0965	0.386	0.0305	5.08	0.279	4.27
Six Flame Curtains	0.264 MMBtu/hr	0.0022	0.0088	0.00069	0.116	0.0064	0.971
Total		0.408	1.631	0.129	21.466	1.18	18.91

EU01B Area		**PM**	**PM_{10}**	**SO_2**	**NOx**	**VOC**	**CO**
Unit Heaters (T1-T4)	1.60 MMBtu/hr	0.0133	0.0533	0.0042	0.701	0.0385	0.589
One Unit Heater (V)	1.875 MMBtu/hr	0.0156	0.0624	0.00493	0.821	0.0452	0.690
Total		0.0289	0.1157	0.00913	1.522	0.0837	1.279

EU01C Hot Mill		**PM**	**PM_{10}**	**SO_2**	**NOx**	**VOC**	**CO**
Billet Fce	30.0 MMBtu/hr	0.250	1.00	0.0788	13.1	0.723	11.0
Anneal Fce	44.8 MMBtu/hr	0.373	1.49	0.118	19.6	1.08	16.5
Boiler 1 &2	14.0 MMBtu/hr	0.117	0.466	0.0368	6.13	0.337	5.15
23 Unit Heaters	6.95 MMbtu/hr	0.0578	0.231	0.0183	3.04	0.167	2.56
Total		0.798	3.187	0.252	41.87	2.307	35.21

Other		**PM**	**PM_{10}**	**SO_2**	**NOx**	**VOC**	**CO**
Emergency Gen	0.649 MMBtu/hr	0.00162	0.00162	0.0000974	0.461	0.0188	0.0647
Unpaved Roads		0.671	0.235	0.00	0.00	0.00	0.00
Storage Tanks		n/a	n/a	n/a	n/a	n/a	n/a
Welding/Grinding		n/a	n/a	n/a	n/a	n/a	n/a
Total		0.67262	0.23662	0.0000974	0.461	0.0188	0.0647

	PM	**PM_{10}**	**SO_2**	**NOx**	**VOC**	**CO**
Total (All Emissions)	**1.91**	**5.17**	**0.39**	**65.33**	**3.59**	**55.45**