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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: January 9, 2007

RE: Plymouth Tube Company / 131-21846-00014

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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 IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require 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 of 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.dot 03/23/06

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MINOR SOURCE OPERATING PERMIT RENEWAL
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.

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

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 131-21846-00014	
Issued by: Nisha Sizemore Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: **January 9, 2007** Expiration Date: **January 9, 2012**

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary seamless steel pipe and tube production source.

Authorized Individual:	Emil Weber, Process Quality Manager
Source Address:	572 W. State Road 14, Winamac, IN 46996
Mailing Address:	572 W. State Road 14, Winamac, IN 46996
General Source Phone:	574-946-3125
SIC Code:	3317
County Location:	Pulaski
Source Location 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 Million British thermal unit per hour, known as EU01A-3, installed in September, 1988, exhausting to stack D22 with annealing chamber exhausting 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 Million British thermal unit per hour, known as EU01A-2, installed in September 1988, exhausted to stack C19 with annealing chamber exhausting to stacks C, D and E, capacity: 7.5 tons per hour of steel;

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

(4) One (1) natural gas-fired annealing furnace rated at 4.80 Million British thermal units per hour, known as EU01A-#1, installed in 1961, exhausting to stack B13 with annealing chamber exhausting to stacks P and AB, capacity: 13.0 tons per hour of steel;

(5) One (1) natural gas-fired Micro-HN process boiler rated at 11.6 Million British thermal units per hour, known as EU01A-HN, installed in 2000, exhausted into the oxygen free tube curing process;

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

(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 1.6 Million British thermal units per hour, total;

(2) Two (2) natural gas-fired unit heaters, known as EU01B-V1 and EU01B-V2, installed in 1972, exhausting through stacks identified as EU-01B-V1 and EU-01B-V2, each rated at 1.875 Million British thermal units per hour;

(3) 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;

(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 day, 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-eight (28) natural gas-fired unit heaters with a combined total heating value of 8.93 Million British thermal units per hour, including two (2) heaters located near the offices, used to heat the plant, each rated at 200,000 British thermal units per hour;

(d) One (1) natural gas-fired emergency generator, exhausting through stack GEN-1, rated at 0.649 Million British thermal units per hour;

(e) Two (2) metal inert gas (MIG) welding stations (for maintenance only);

(f) Six (6) stick welding stations (for maintenance only);

(g) Oxyacetylene flame-cutting (for maintenance only);

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

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

(j) Two (2) kerosene storage tanks, capacity: 250 gallon, throughput: 450 gallons per year, each;

(k) 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;

(l) One (1) quarter mile unpaved stone road, supporting a maximum gross vehicle weight of thirty-five (35) tons of 18 wheel flatbed semi trailers, two (2) fork lift, and three (3) side loaders, diesel truck cab and trailer and diesel waste liquid hauling truck with a speed limit of five (5) miles per hour;

(m) Two (2) closed lid oil dip tanks, using a mixture of kerosene and diesel; and

(n) Two office heaters each rated at 100,000 British thermal units per hour, located in the front office and material laboratory.

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M131-21846-00014, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ , within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

B.8 Certification

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) an "Authorized Individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, 46204-2251

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

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

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

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

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

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M131-21846-00014 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

(1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(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)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC13-17-3-2][IC 13-30-3-1]

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

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

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

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. The applicable fee is due April 1 of each year.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

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

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

(a) Violation of any conditions of this permit.

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

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

(a) 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
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.8 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.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.11 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.12 General Record Keeping Requirements[326 IAC 2-6.1-5]

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

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

(c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNITS 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 Million British thermal unit per hour, known as EU01A-3, installed in September, 1988, exhausting to stack D22 with annealing chamber exhausting 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 Million British thermal unit per hour, known as EU01A-2, installed in September 1988, exhausted to stack C19 with annealing chamber exhausting to stacks C, D and E, capacity: 7.5 tons per hour of steel;

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

(4) One (1) natural gas-fired annealing furnace rated at 4.80 Million British thermal units per hour, known as EU01A-#1, installed in 1961, exhausting to stack B13 with annealing chamber exhausting to stacks P and AB, capacity: 13.0 tons per hour of steel;

(5) One (1) natural gas-fired Micro-HN process boiler rated at 11.6 Million British thermal units per hour, known as EU01A-HN, installed in 2000, exhausted into the oxygen free tube curing process;

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

(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 1.6 Million British thermal units per hour, total;

(2) Two (2) natural gas-fired unit heaters, known as EU01B-V1 and EU01B-V2, installed in 1972, exhausting through stacks identified as EU-01B-V1 and EU-01B-V2, each rated at 1.875 Million British thermal units per hour;

(3) 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;

(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 day, capacity: 9.0 tons per hour of steel;

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

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

(c) Continued:

(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-eight (28) natural gas-fired unit heaters with a combined total heating value of 8.93 Million British thermal units per hour, including two (2) heaters located near the offices, used to heat the plant, each rated at 200,000 British thermal units per hour;

(d) One (1) natural gas-fired emergency generator, exhausting through stack GEN-1, rated at 0.649 Million British thermal units per hour;

(e) Two (2) metal inert gas (MIG) welding stations (for maintenance only);

(f) Six (6) stick welding stations (for maintenance only);

(g) Oxyacetylene flame-cutting (for maintenance only);

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

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

(j) Two (2) kerosene storage tanks, capacity: 250 gallon, throughput: 450 gallons per year, each;

(k) 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;

(l) One (1) quarter mile unpaved stone road, supporting a maximum gross vehicle weight of thirty-five (35) tons of 18 wheel flatbed semi trailers, two (2) fork lift, and three (3) side loaders, diesel truck cab and trailer and diesel waste liquid hauling truck with a speed limit of five (5) miles per hour;

(m) Two (2) closed lid oil dip tanks, using a mixture of kerosene and diesel; and

(n) Two office heaters each rated at 100,000 British thermal units per hour, located in the front office and material laboratory.

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

Emission Limitations and Standards

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 0.657 pound per million British thermal units.

(b) Pursuant to 326 IAC 6-2-4, the PM emissions from EU01A-HN, shall not exceed 0.440 pound 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 each not exceed 0.493 pound per million British thermal units.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the emissions units.

SECTION E.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

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

(5) One (1) natural gas-fired 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; and

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

New Source Performance Standards (NSPS) Requirements [326 IAC 12-1]

E.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

Pursuant to 40 CFR 63.252, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1.

E.1.2 NSPS Subpart Dc Requirements [40 CFR 60, Subpart Dc]

Pursuant to CFR Part 60, Subpart Dc, the Permittee shall comply with the provisions of 40 CFR Part 60.40c, as specified as follows:

What this Subpart Covers?

§ 60.40c Applicability and delegation of authority.

(a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

(c) Steam generating units which meet the applicability requirements in paragraph (a) of this section are not subject to the sulfur dioxide (SO_2) or particulate matter (PM) emission limits, performance testing requirements, or monitoring requirements under this subpart (§§60.42c, 60.43c, 60.44c, 60.45c, 60.46c, or 60.47c) during periods of combustion research, as defined in §60.41c.

(d) Any temporary change to an existing steam generating unit for the purpose of conducting combustion research is not considered a modification under §60.14.

(e) Heat recovery steam generators that are associated with combined cycle gas turbines and meet the applicability requirements of subpart KKKK of this part are not subject to this subpart. This subpart will continue to apply to all other heat recovery steam generators that are capable of combusting more than or equal to 2.9 MW (10 MMBtu/h) heat input of fossil fuel but less than or equal to 29 MW (100 MMBtu/h) heat input of fossil fuel. If the heat recovery steam generator is subject to this subpart, only emissions resulting from combustion of fuels in the steam generating unit are subject to this subpart. (The gas turbine emissions are subject to subpart GG or KKKK, as applicable, of this part).

§ 60.41c Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

Annual capacity factor means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

Coal means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388–77, 90, 91, 95, or 98a, Standard Specification for Classification of Coals by Rank (IBR—see §60.17), coal refuse, and petroleum coke. Coal-derived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

Heat input means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

Heat transfer medium means any material that is used to transfer heat from one point to another point.

Maximum design heat input capacity means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

Natural gas means (1) a naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane, or (2) liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835–86, 87, 91, or 97, “Standard Specification for Liquefied Petroleum Gases” (incorporated by reference—see §60.17).

Steam generating unit means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

Steam generating unit operating day means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

§ 60.48c Reporting and recordkeeping requirements.

(a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

(g) The owner or operator of an affected facility that only burns gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month.

(i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

(j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

E.1.3 Record Keeping and Reporting Requirements [326 IAC 12]

Pursuant to 326 IAC 12, the Permittee shall record and report records of the amounts of natural gas combusted in the natural gas-fired Micro-HN process boiler each day. This condition expires when the revisions made to 40 CFR 60 Subpart Dc, as amended on February 27, 2006, become effective as Indiana Law. This condition is not federally enforceable.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/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 PERMI LIMIT OF _____

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

PAGE 1 OF 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____
_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	**Plymouth Tube Company**
Address:	**572 W. State Road 14**
City:	**Winamac, IN 46996**
Phone #:	**574-946-3125**
MSOP #:	**MSOP 131-21846-00014**

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 131-21846-00014.
☐ not in compliance with the requirements of MSOP 131-21846-00014.

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

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

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Minor Source Operating Permit Renewal

Source Name:	Plymouth Tube Company
Source Location:	572 West State Road 14, Winamac, IN 46996
County:	Pulaski
SIC Code:	3317
Operation Permit No.:	131-7690-00014
Operation Permit Issuance Date:	July 31, 2001
Permit Renewal No.:	M131-21846-00014
Permit Reviewer:	Ganesh Srinivasan/EVP

On November 22, 2006, the Office of Air Quality (OAQ) had a notice published in the Pulaski County Journal, Indiana, stating that Plymouth Tube Company had applied for a Minor Source Operating Permit (MSOP) renewal to operate a seamless steel pipe and tube production facility. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 19, 2006, Elizabeth Hill of Bruce Carter Associates, LLC submitted comments on the proposed MSOP renewal permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

Please change the authorized individual from Chief Financial Office to Emil Weber, Process Quality Manager.

Response 1

Section A.1 has been revised to change the name and title of the authorized individual as follows:

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 seamless steel pipe and tube production source.

Authorized Individual: ~~Chief Financial Officer~~ **Emil Weber, Process Quality Manager**

Comment 2

In the area known as EU01B, there are actually four (4) natural gas-fired unit heaters, known as EU01B-T1 through T4 installed in 1994, exhausting through stack ST1 through ST4, respectively, and rated at 1.6 million British thermal units per hour, total.

There is one additional heater rated at 1.875 million British thermal units per hour identified as EU01B-V and exhausting through stack EU-01B-V, located in the area known as EU01B.

Response 2

Sections A.2 and D.1 haven been revised as follows to incorporate the requested changes. Emissions from one additional heater (EU01B-V2) have been calculated and attached as Appendix A to this ATSD. There are no changes in emissions due to the removal of one heater since the emission calculations were already done for four heaters only (EU01B-T1 through EU01B-T4).

A.2 Emissions Units and Pollution Control Equipment Summary

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

****

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

(1) ~~Five (5)~~ **Four (4)** natural gas-fired unit heaters, known as EU01B-T1 through ~~T5~~ **T4**, installed in 1994, exhausted through stacks ST1 through ~~ST5~~ **ST4**, respectively rated at ~~2.0~~ **1.6** Million British thermal units per hour, total;

(2) ~~One (1)~~ **Two (2)** natural gas-fired unit ~~heater~~ **heaters**, known as ~~EU01B-V~~ **EU01B-V1 and EU01B-V2**, installed in 1972, exhausting through ~~stack~~ **stacks identified as EU-01B-V1 and EU-01B-V2**, **each** rated at 1.875 Million British thermal units per hour;

****

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

****

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

(1) ~~Five (5)~~ **Four (4)** natural gas-fired unit heaters, known as EU01B-T1 through ~~T5~~ **T4**, installed in 1994, exhausted through stacks ST1 through ~~ST5~~ **ST4**, respectively rated at ~~2.0~~ **1.6** Million British thermal units per hour, total;

(2) ~~One (1)~~ **Two (2)** natural gas-fired unit heater heaters, known as ~~EU01B-V~~ **EU01B-V1 and EU01B-V2**, installed in 1972, exhausting through ~~stack~~ **stacks identified as EU-01B-V1 and EU-01B-V2**, **each** rated at 1.875 Million British thermal units per hour;

****

Comment 3

Please include the form for the required semi-annual report for the NSPS Subpart Dc.

Response 3

There is no specific formatted form required for reporting, therefore, the form can be prepared by the Permittee.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a MSOP Renewal

Source Background and Description

Source Name:	**Plymouth Tube Company**
Source Location:	**572 West State Road 14, Winamac, IN 46996**
County:	**Pulaski**
SIC Code:	**3317**
Operation Permit No.:	**131-7690-00014**
Operation Permit Issuance Date:	**July 31, 2001**
Permit Renewal No.:	**M131-21846-00014**
Permit Reviewer:	**Ganesh Srinivasan/EVP**

The Office of Air Quality (OAQ) has reviewed an MSOP Renewal application from Plymouth Tube Company relating to the operation of stationary seamless steel pipe and tube production unit**.**

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission 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 Million British thermal unit per hour, known as EU01A-3, installed in September, 1988, exhausting to stack D22 with annealing chamber exhausting 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 Million British thermal unit per hour, known as EU01A-2, installed in September 1988, exhausted to stack C19 with annealing chamber exhausting to stacks C, D and E, capacity: 7.5 tons per hour of steel;

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

(4) One (1) natural gas-fired annealing furnace rated at 4.80 Million British thermal units per hour, known as EU01A-#1, installed in 1961, exhausting to stack B13 with annealing chamber exhausting to stacks P and AB, capacity: 13.0 tons per hour of steel;

(5) One (1) natural gas-fired Micro-HN process boiler rated at 11.6 Million British thermal units per hour, known as EU01A-HN, installed in 2000, exhausted into the oxygen free tube curing process;

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

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

(1) Five (5) natural gas-fired unit heaters, known as EU01B-T1 through T5, installed in 1994, exhausted through stacks ST1 through ST5, respectively rated at 2.0 Million British thermal units per hour, total;

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

(3) 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;

(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 day, 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-eight (28) natural gas-fired unit heaters with a combined total heating value of 8.93 Million British thermal units per hour, including two (2) heaters located near the offices, used to heat the plant, each rated at 200,000 British thermal units per hour;

(d) One (1) natural gas-fired emergency generator, exhausting through stack GEN-1, rated at 0.649 Million British thermal units per hour;

(e) Two (2) metal inert gas (MIG) welding stations (for maintenance only);

(f) Six (6) stick welding stations (for maintenance only);

(g) Oxyacetylene flame-cutting (for maintenance only);

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

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

(j) Two (2) kerosene storage tanks, capacity: 250 gallon, throughput: 450 gallons per year, each;

(k) 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;

(l) One (1) quarter mile unpaved stone road, supporting a maximum gross vehicle weight of thirty-five (35) tons of 18 wheel flatbed semi trailers, two (2) fork lift, and three (3) side loaders, diesel truck cab and trailer and diesel waste liquid hauling truck with a speed limit of five (5) miles per hour;

(m) Two (2) closed lid oil dip tanks, using a mixture of kerosene and diesel; and

(n) Two office heaters each rated at 100,000 British thermal units per hour, located in the front office and material laboratory.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) MSOP 131-7690-00014, issued on July 31, 2001,
(b) First Notice Only Change 131-15169-00014, issued on December 7, 2001,
(c) Second Notice Only Change 131-15336-00014, issued on April 10, 2002,
(d) Third Notice Only Change 131-15951-00014, issued on May 9, 2002,
(e) Fourth Notice Only Change 131-19329-00014, issued on December 8, 2004,
(f) Fifth Notice Only Change 131-21296-00014, issued on July 7, 2005, and
(g) Sixth Notice Only Change 131-22331-00014, issued on December 15, 2005.

Enforcement Issue

There are no enforcement actions pending.

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
Weld Mill					
EU01 B-A	West Annealing Furnace	48.0	1.50	7,915	77
EU01 B-B	West Annealing Furnace	48.0	1.50	7,915	77
EU01B-C	West Annealing Furnace	48.0	1.50	1,700	275
EU01B-D	West Annealing Furnace	48.0	1.50	10,000	140
EU01B-E	West Annealing Furnace	48.0	1.50	1,245	85
EU01B-K	East Annealing Furnace	48.0	1.50	990	85
EUO1B-R	East Annealing Furnace	48.0	1.50	990	85
EU01B-J	East Annealing Furnace	48.0	1.50	990	85
EU01B-ST1-ST4	Four (4) Unit Heaters	30.0	0.67	Unk	Unk
EU01B-L	Roof Exhaust Fan	20.75	4.00	32,000	77
EU01B-M	East Annealing Furnace	14.0	2.00	Unk	Unk
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 (6) 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

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 October 3, 2005.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Pages 1 through 9).

Potential to Emit Before Controls

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, includling 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/yr)
PM	1.34
PM-10	5.35
SO_2	0.42
VOC	3.87
CO	59.10
NO_x	70.36

HAPs	Potential to Emit (tons/yr)
Hexane	1.27
All Other	0.06
Total	**1.33**

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than 100 tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of CO and NOx are greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the actual 2005 emission data provided by the source.

Pollutant	Emissions (tons/yr)
PM	1.0
PM-10	1.0
SO_2	0.0
VOC	1.0
CO	13.87
NO_x	16.51
Single HAP	Not Reported
Combination HAPs	Not Reported

County Attainment Status

The source is located in Pulaski County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Pulaski County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx 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 for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

(c) Pulaski County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions 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.

(d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 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.

(e) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	1.34
PM-10	5.35
SO_2	0.42
VOC	3.87
CO	59.10
NO_x	70.36
Single HAP	1.27
Combination HAPs	1.33

This existing source is not a major stationary source because no attainment regulated 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.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

(a) The New Source Performance Standard, 326 IAC 12, 40 CFR 60.40, 40 CFR 60.40a, 40CFR 60.40b and 40 CFR 60.40c, Subparts D, Da, Db and Dc are not included in the permit for the three (3) natural gas-fired boilers, known as EU-01A-Boiler 2, EU1C - Boiler 1 and EU01 C-Boiler 2 because their capacities are less than 10 million British thermal units per hour.

(b) The one (1) Micro-HN process boiler, identified as EU01A-HN is subject to the New Source Performance Standard, 326 IAC 12 and 40 CFR 60, Subpart Dc because it was installed after the June 9, 1989 applicability date and is rated between ten (10) and one-hundred (100) million British thermal units per hour.

Non applicable portions of the NSPS will not be included in the permit. This source is subject to the following portions of Subpart Dc.

(1) § 60.40c

(2) § 60.41c

(3) § 60.48c

40 CFR 60, Subpart Dc was amended February 27, 2006 under Federal Register notice 71 FR 9884. However, pursuant to 326 IAC 1-1-3, the version of the rule referenced by 326 IAC 12 is the version in existence on July 1, 2005. Therefore, the amendments are not included in the state rules, and the boiler at this source is subject to both versions of the rule. All the requirements of 326 IAC 12 are the same as the requirements listed under Federal Rule Applicability except 40 CFR 60.48c(g).

Since the requirement of the old version of rule 40 CFR 60.48c(g) is more stringent than the amended version of rule 40 CFR 60.48c(g), the old rule 40 CFR 60.48c(g) will be also applicable to the boilers. The condition to comply with the requirements of the old rule 40 CFR 60.48c(g) shall expire when the revisions made to 40 CFR 60 Subpart Dc, as amended on February 27, 2006, become effective as Indiana Law. This condition is not federally enforceable.

(c) The New Source Performance Standard, 326 IAC 12, (40 CFR 60.110a and 60.110b), Subparts K, Ka and Kb are not included in the permit for the five (5) storage tanks , because each tank has a capacity less than 40 cubic meters.

(d) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this review.

(e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14 and 40 CFR Part 63) included in this review.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

Pursuant to 326 IAC 2-2 (PSD), this existing minor source, originally constructed in 1988 after the August 7, 1977 rule applicability date, is still not considered a major source. This source is not one of the 28 listed source categories and it has never operated at, and does not have the potential to emit of, 250 tons per year (tpy) or more of any regulated pollutant. The uncontrolled PTE for the worst-case criteria pollutant emitted at this source, NOx, is 70.36 tons per year, below the 250 tpy PSD rule applicability threshold. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of forty percent (40%) 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.

State Rule Applicability – Individual Facilities

326 IAC 6-2-4 (Particulate emissions limitation for facilities constructed after September 21, 1983)

(a) The One (1) boiler, known as EU01A-Boiler 2, installed in 1988, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation in 326 IAC 6-2-4:

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

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.

The heat input capacity of the boiler is 7.0 million British thermal units per hour.

$$Pt = 1.09/(7.0)^{0.26} = 0.657 \text{ lb/MMBtu heat input}$$

The potential PM emission rate is:
0.06 ton/yr * (2000 lbs/ton / 8760 hrs/yr) = 0.0136 lb/hr
(0.0136 lb/hr /7.0 MMBtu/hr) = 0.0019 lb PM/MMBtu

Therefore, the boiler, known as EU01A-Boiler 2, will comply with this rule.

(b) The two (2) boilers, known as EU01 C-Boiler 1 and EU01 C-Boiler 2, installed in 1990, must comply with the requirements of 326 IAC 6-2-4.

The heat input capacity of the two (2) boilers is 14.0 million British thermal units per hour. There was one boiler with a heat input capacity of 7.0 MMBtu per hour when these boilers were installed; therefore the total Q is 21.0 MMBtu per hour.

$$Pt = 1.09/(21.0)^{0.26} = 0.493 \text{ lb/MMBtu heat input}$$

The potential PM emission rate is:

0.12 ton/yr * (2000 lbs/ton / 8760 hrs/yr) = 0.0273 lb/hr
(0.0273 lb/hr / 14.0 MMBtu/hr) = 0.0019 lb PM/MMBtu

Therefore, the two (2) boilers, known as EU01 C-Boiler 1 and EU01 C-Boiler 2, will comply with this rule.

(c) The one (1) natural gas-fired Micro-HN process boiler, known as EU01A-HN, installed in 2000, must comply with the requirements of 326 IAC 6-2-4.

The heat input capacity of the one (1) boiler is 11.6 million British thermal units per hour. There were three (3) boilers rated at 21.0 million British thermal units per hour, total, in operation when this boiler was constructed. Therefore the total Q is 32.6 MMBtu per hour.

$$Pt = 1.09/ (32.6)^{0.26} = 0.440 \text{ lb/MMBtu heat input}$$

The potential PM emission rate is:

0.10 ton/yr * (2000 lbs/ton / 8760 hrs/yr) = 0.022 lb/hr
(0.022 lb/hr /11.6 MMBtu/hr) = 0.0019 lb PM/MMBtu

Therefore, the one (1) natural gas-fired Micro-HN process boiler, known as EU01A-HN, will comply with this rule.

Conclusion

The operation of this iron and steel pipe manufacturig unit shall be subject to the conditions of the Minor Source Operating Permit **131-21846-00014.**

Appendix A: Emissions Calculations

Company Name: Plymouth Tube Company
Address City IN Zip: 572 West State Road 14, Winamac, IN 46996
Permit Number: 131-21846-00014
Plt ID: 131-00014
Reviewer: GSN/EVP

Uncontrolled Potential To Emit* (tons per year)								
Emission Unit	**PM**	**PM10**	**SO2**	**Nox**	**VOC**	**CO**	**Single HAP**	**Combined HAPs**
							Hexane	
EU01A Cold Draw	0.35	1.38	0.11	18.17	1.00	15.26	0.33	0.34
EU01B Weld Mill	0.17	0.68	0.05	9.01	0.50	7.57	0.16	0.17
EU01C Hot Mill	0.81	3.25	0.26	42.81	2.35	35.96	0.77	0.81
Misc. Heaters	0.01	0.03	0.00	0.37	0.02	0.31	0.01	0.01
Storage Tanks	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.
Welding and Cutting	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.
Unpaved Roads	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.
Total	**1.34**	**5.35**	**0.42**	**70.36**	**3.87**	**59.10**	**1.27**	**1.33**

* Based on 8760 Hours of Operation

Appendix A: Emissions Calculations

Natural Gas Combustion Only
MM BTU/HR <100

Cold Draw

Company Name: Plymouth Tube Company
Address City IN Zip: 572 West State Road 14, Winamac, IN 46996
Permit Number: 131-21846-00014
Plt ID: 131-00014
Reviewer: GSN/EVP

Emission Unit	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
EU01A-3	8.28	
EU01A-2	9.54	
EU01A-Boiler 2	7.00	
EU01A-#1	4.80	
EU01A-HN	11.60	
6 Flame Curtains	0.26	
Total	**41.48**	**363.4**

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.35	1.38	0.11	18.17	1.00	15.26

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See next page for HAPs emissions calculations.

Natural Gas Combustion Only
MM BTU/HR <100
Cold Draw
HAPs Emissions

Company Name: **Plymouth Tube Company**
Address City IN Zip: **572 West State Road 14, Winamac, IN 46996**
Permit Number: **131-21846-00014**
Plt ID: **131-00014**
Reviewer: **GSN/EVP**
Date: **02/02/06**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.816E-04	2.180E-04	1.363E-02	3.271E-01	6.178E-04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	9.085E-05	1.999E-04	2.544E-04	6.905E-05	3.816E-04	3.429E-01

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Natural Gas Combustion Only
MM BTU/HR <100
Weld Mill

Company Name: Plymouth Tube Company
Address City IN Zip: 572 West State Road 14, Winamac, IN 46996
Permit Number: 131-21846-00014
Plt ID: 131-00014
Reviewer: GSN/EVP

Emission Units	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
EU01B-T1 through T4	1.60	
EU01B-V	1.88	
EU01B-West	17.10	
Total	**20.58**	**180.2**

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.17	0.68	0.05	9.01	0.50	7.57

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Weld Mill
HAPs Emissions

Company Name: Plymouth Tube Company
Address City IN Zip: 572 West State Road 14, Winamac, IN 46996
Permit Number: 131-21846-00014
Plt ID: 131-00014
Reviewer: GSN/EVP
Date: 02/02/06

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.892E-04	1.081E-04	6.759E-03	1.622E-01	3.064E-04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.506E-05	9.913E-05	1.262E-04	3.425E-05	1.892E-04	1.701E-01

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

Company Name: **Plymouth Tube Company**
Address City IN Zip: **572 West State Road 14, Winamac, IN 46996**
Permit Number: **131-21846-00014**
Plt ID: **131-00014**
Reviewer: **GSN/EVP**

Heat Input Capacity Emission Units	MMBtu/hr	Potential Throughput MMCF/yr
EU01C-Billet furnace	30.00	
EU01C-Annealing Furnace	44.80	
EU01C-Boiler 1 and 2	14.00	
28 Heaters	8.93	
Total	**97.73**	**856.1**

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.81	3.25	0.26	42.81	2.35	35.96

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Hot Mill
HAPs Emissions

Company Name: Plymouth Tube Company
Address City IN Zip: 572 West State Road 14, Winamac, IN 46996
Permit Number: 131-21846-00014
Plt ID: 131-00014
Reviewer: GSN/EVP
Date: 02/02/06

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	8.989E-04	5.137E-04	3.210E-02	7.705E-01	1.455E-03

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.140E-04	4.709E-04	5.993E-04	1.627E-04	8.989E-04	8.078E-01

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Misc. Heaters

Company Name: **Plymouth Tube Company**
Address City IN Zip: **572 West State Road 14, Winamac, IN 46996**
Permit Number: **131-21846-00014**
Plt ID: **131-00014**
Reviewer: **GSN/EVP**

Emission Unit	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2 Heaters	0.20	
Emergency Gen.	0.65	
Total	**0.85**	**7.4**

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.01	0.03	0.00	0.37	0.02	0.31

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Misc. Heaters
HAPs Emissions

Company Name: **Plymouth Tube Company**
Address City IN Zip: **572 West State Road 14, Winamac, IN 46996**
Permit Number: **131-21846-00014**
Plt ID: **131-00014**
Reviewer: **GSN/EVP**
Date: **02/02/06**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	7.809E-06	4.462E-06	2.789E-04	6.694E-03	1.264E-05

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	**Total**
Potential Emission in tons/yr	1.859E-06	4.090E-06	5.206E-06	1.413E-06	7.809E-06	7.018E-03

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

What if you are not satisfied with this decision and you want to file an appeal?

Who may file an appeal?
The decision described in the accompanying Notice of Decision may be administratively appealed. Filing an appeal is formally known as filing a "Petition for Administrative Review" to request an "administrative hearing."

If you object to this decision issued by the Indiana Department of Environmental Management (IDEM) and are: 1) the person to whom the decision was directed, 2) a party specified by law as being eligible to appeal, or 3) aggrieved or adversely affected by the decision, you are entitled to file an appeal. (An aggrieved or adversely affected person is one who would be considered by the court to be negatively impacted by the decision. If you file an appeal because you feel that you are aggrieved, it will be up to you to demonstrate in your appeal how you are directly impacted in a negative way by the decision).

The Indiana Office of Environmental Adjudication (OEA) was established by state law – see Indiana Code (IC) 4-21.5-7 – and is a separate state agency independent of IDEM. The jurisdiction of the OEA is limited to the review of environmental pollution concerns or any alleged technical or legal deficiencies associated with the IDEM decision making process. Once your request has been received by OEA, your appeal may be considered by an Environmental Law Judge.

What is required of persons filing an appeal?
Filing an appeal is a legal proceeding, so it is suggested that you consult with an attorney. Your request for an appeal must include your name and address and identify your interest in the decision (Or, if you are representing someone else, his or her name and address and their interest in the decision). In addition, please include a photocopy of the accompanying Notice of Decision or list the permit number and name of the applicant, or responsible party, in your letter.

Before a hearing is granted, you must identify the reason for the appeal request and the issues proposed for consideration at the hearing. You also must identify the permit terms and conditions that, in your judgment, would appropriately satisfy the requirements of law with respect to the IDEM decision being appealed. That is, you must suggest an alternative to the language in the permit (or other order, or decision) being appealed, and your suggested changes must be consistent with all applicable laws (See Indiana Code 13-15-6-2) and rules (See Title 315 of the Indiana Administrative Code, or 315 IAC).

The effective date of this agency action is stated on the accompanying Notice of Decision (or other IDEM decision notice). If you file a "Petition for Administrative Review" (appeal), you may wish to specifically request that the action be "stayed" (temporarily halted) because most appeals do not allow for an automatic "stay." If, after an evidentiary hearing, a "stay" is granted, the IDEM-approved action may be halted altogether, or only allowed to continue in part, until a final decision has been made regarding the appeal. However, if the action is not "stayed" the IDEM-approved activity will be allowed to continue during the appeal process.

(See reverse side)

Where can you file an appeal?
If you wish to file an appeal, you must do so in writing. There are no standard forms to fill out and submit, so you must state your case in a letter (called a petition for administrative review) to the Indiana Office of Environmental Adjudication (OEA). Do not send the original copy of your appeal request to IDEM. Instead, send or deliver your letter to:

The Indiana Office of Environmental Adjudication
100 North Senate Ave.
Indiana Government Center North
Room 1049
Indianapolis, IN 46204

If you file an appeal, also please send a copy of your appeal letter to the IDEM contact person identified in the Notice of Decision, and to the applicant (person receiving an IDEM permit, or other approval).

Your appeal (petition for administrative review) must be received by the Office of Environmental Adjudication in a timely manner. Different types of permit approvals have different deadlines for filing an appeal. The accompanying Notice of Decision (NOD) explains how to determine the due date for filing an appeal for this particular permit decision. To ensure that you meet this filing requirement, your appeal request must be:

1) Delivered in person to the OEA by the close-of-business on the due date. (If the due date falls on a day when the Office of Environmental Adjudication (OEA) is closed for the weekend or for a state holiday, then your petition will be accepted on the next business day on which OEA is open.); or
2) Given to a private carrier who will deliver it to the OEA on your behalf, (and from whom you must obtain a receipt dated on or before the due date); or
3) For those appeal requests sent by U.S. Mail, your letter must be postmarked by no later than midnight of the due date; or
4) Faxed to the OEA at 317/233-9372 before the close-of-business of the due date, provided that the original signed "Petition for Administrative Review" is also sent, or delivered, to the OEA in a timely manner.

What are the costs associated with filing an appeal?
The OEA does not charge a fee for filing documents for an administrative review or for the use of its hearing facilities. However, OEA does charge a fifteen cent ($.15) per page fee for copies of any documents you may request. Another cost that could be associated with your appeal would be for attorney's fees. Although you have the option to act as your own attorney, the administrative review and associated hearing are complex legal proceedings; therefore, you should consider whether your interests would be better represented by an experienced attorney.

What can you expect from the Office of Environmental Adjudication (OEA) after you file for an appeal?
The OEA will provide you with notice of any prehearing conferences, preliminary hearings, hearings, "stays," or orders disposing of the review of this decision. In addition, you may contact the OEA by phone at 317/232-8591 with any scheduling questions. However, technical questions should be directed to IDEM at the number indicated on the Notice of Decision.

Do not expect to discuss details of your case with the OEA other than in a formal setting such as a prehearing conference, a formal hearing, or a settlement conference. The OEA is not allowed to discuss a case without all sides being present. All parties to the proceeding are expected to appear at the initial prehearing conference.