



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: June 4, 2007
RE: Seymour Tubing, Inc. / 071-23131-00019
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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New Source Review and Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Seymour Tubing, Inc.
1515 East Fourth Street
Seymour, Indiana 47274

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-6.1-6, applicable to those conditions.

Operation Permit No.: MSOP 071-23131-00019	
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 4, 2007 Expiration Date: June 4, 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 carbon steel tubing manufacturing source.

Source Address:	1515 East Fourth Street, Seymour, Indiana 47274
Mailing Address:	1515 East Fourth Street, Seymour, Indiana 47274
General Source Phone Number:	(812) 523-3638
SIC Code:	3547
County Location:	Jackson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Four (4) heated degreasing vats, two (2) constructed in 1989 and two (2) constructed in 1998, maximum usage rate: 105,773 pounds of cleaner per year, total.
- (b) Twelve (12) parts washers that are used to clean and coat metal with a rust preventative, using no photochemically reactive VOC, constructed in 1998, maximum usage rate: 1 gallon of rust preventive per month, each.
- (c) Two (2) rust prevention dip tanks, constructed in 1989 and 1998, using no photochemically reactive VOC, maximum usage rate: 23,926 gallons per year, total.
- (d) One (1) annealing furnace, identified as Furnace #1, constructed in 1989, heat input capacity: 1.25 million British thermal units per hour.
- (e) One (1) annealing furnace, identified as Furnace #2, constructed in 1998, heat input capacity: 6.5 million British thermal units per hour.
- (f) Two (2) natural gas-fired boilers, identified as Boiler #1 and Boiler #2, installed in 1998 and 1999, heat input capacity: 8.4 million British thermal units per hour, each.
- (g) Combustion units, constructed after 1989 and prior to 2002, not including boilers, with a total heat input capacity of 82.542 million British thermal units per hour.
- (h) Machining, where an aqueous cutting coolant continuously floods the machining interface, with a total coolant usage rate of 810 gallons per year (9,000 gallons when combined in solution with water), including:
 - (1) Twenty (20) cold cutting or rotary disc saws, constructed after 1989 and prior to 2001, capacity: 22 pounds of carbon steel tubing per hour, each.

- (2) One (1) bushing/chamfering machine, constructed after 1989 and prior to 2001, capacity: 26.4 pounds of carbon steel tubing per hour.
- (3) Ten (10) bushing/chamfering machines, constructed after 2000 and prior to 2007, capacity: 26.4 pounds of carbon steel tubing per hour, each.
- (i) One (1) pretreatment process, identified as Pretreatment Pickling Process #1, constructed in 1989, consisting of two (2) pickling vats, cold water rinse, phosphate coating, cold water rinse, neutralization and water soluble lubricant, equipped with a wet scrubber (Wet Scrubber #1) for particulate control, exhausting to Stack S-1, capacity: 7,300 pounds of carbon steel tubing per hour. The scrubber is equipped with a knitted mesh polypropylene demister.
- (j) One (1) pretreatment process, identified as Pretreatment Pickling Process #2, constructed in 1998, consisting of two (2) pickling vats, cold water rinse, phosphate coating, cold water rinse, neutralization and water soluble lubricant, equipped with a wet scrubber (Wet Scrubber #2) for particulate control, exhausting to Stack S-2, capacity: 5,700 pounds of carbon steel tubing per hour. The scrubber is equipped with a knitted mesh polypropylene demister.
- (k) Three (3) high frequency welding stations, identified as Mill #1, Mill #2, and Mill #3, constructed in 1991, 1992, and 1998, capacity: 4,921 inches of pipe per minute, each.

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, MSOP 071-23131-00019, 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.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 require-

ments 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 MSOP 071-23131-00019 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
MC 61-53 IGCN 1003
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
MC 61-53 IGCN 1003
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
MC 61-53 IGCN 1003
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.
- (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 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

C.8 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
MC 61-53 IGCN 1003
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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.11 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.12 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.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:

- (1) monitoring data;
- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 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.17 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Degreasing

- (a) Four (4) heated degreasing vats, two (2) constructed in 1989 and two (2) constructed in 1998, maximum usage rate: 105,773 pounds of cleaner per year, total.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Boilers

- (f) Two (2) natural gas-fired boilers, identified as Boiler #1 and Boiler #2, installed in 1998 and 1999, heat input capacity: 8.4 million British thermal units per hour, each.

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

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

D.2.1 Particulate [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the one (1) boiler, identified as Boiler #1, constructed in 1998, with a heat input capacity of 8.4 million British thermal units per hour, shall be limited to 0.6 pound per million British thermal units heat input.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the one (1) boiler, identified as Boiler #2, constructed in 1999, with a heat input capacity of 8.4 million British thermal units per hour, shall be limited to 0.5 pound per million British thermal units heat input.

These limitations are based on the following equation:

$$1.09/Q^{0.26}$$

Where:

- Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu 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.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Pretreatment

- (i) One (1) pretreatment process, identified as Pretreatment Pickling Process #1, constructed in 1989, consisting of two (2) pickling vats, cold water rinse, phosphate coating, cold water rinse, neutralization and water soluble lubricant, equipped with a wet scrubber (Wet Scrubber #1) for particulate control, exhausting to Stack S-1, capacity: 7,300 pounds of carbon steel tubing per hour. The scrubber is equipped with a knitted mesh polypropylene demister.
- (j) One (1) pretreatment process, identified as Pretreatment Pickling Process #2, constructed in 1998, consisting of two (2) pickling vats, cold water rinse, phosphate coating, cold water rinse, neutralization and water soluble lubricant, equipped with a wet scrubber (Wet Scrubber #2) for particulate control, exhausting to Stack S-2, capacity: 5,700 pounds of carbon steel tubing per hour. The scrubber is equipped with a knitted mesh polypropylene demister.

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

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

D.3.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) pretreatment process, identified as Pretreatment Pickling Process #1, shall not exceed 9.76 pounds per hour when operating at a process weight rate of 7,300 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) pretreatment process, identified as Pretreatment Pickling Process #2, shall not exceed 8.27 pounds per hour when operating at a process weight rate of 5,700 pounds per hour.

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

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

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

D.3.2 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 these facilities and their control devices.

Compliance Determination Requirements

D.3.3 Particulate Control

Pursuant to MSOP 071-12403-00019, issued on August 20, 2001, and this permit, in order to comply with Condition D.3.1, the scrubbers for particulate control shall be in operation and control emissions from the pretreatment pickling processes at all times when the pretreatment pickling processes are in operation.

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

D.3.4 Visible Emissions Notations

- (a) Visible emission notations of the pretreatment pickling processes stack exhausts (S-1 and S-2) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.3.5 Scrubber Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the scrubber used in conjunction with the one (1) pretreatment process, identified as Pretreatment Pickling Process #1, at least once per day when the pretreatment pickling process is in operation. When for any one reading, the pressure drop across the scrubber is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The Permittee shall record the pressure drop across the scrubber used in conjunction with the one (1) pretreatment process, identified as Pretreatment Pickling Process #2, at least once per day when the pretreatment pickling process is in operation. When for any one reading, the pressure drop across the scrubber is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (c) The Permittee shall record the scrubbing liquid flow rate of the scrubber used in conjunction with the one (1) pretreatment process, identified as Pretreatment Pickling Process #1, at least once per day when the pretreatment process is in operation. When for any one reading, the scrubbing liquid flow rate is less than 200 gallons per minute or a rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A flow rate that is below the minimum flow rate is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (d) The Permittee shall record the scrubbing liquid flow rate of the scrubber used in conjunction

with the one (1) pretreatment process, identified as Pretreatment Pickling Process #2, at least once per day when the pretreatment process is in operation. When for any one reading, the scrubbing liquid flow rate is less than 25.6 gallons per minute or a rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A flow rate that is below the minimum flow rate is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (e) The instruments used for determining the pressure and flow rate shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.6 Failure Detection

In the event of scrubber or demister failure, the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

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

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain daily records of visible emission notations of the pretreatment pickling processes stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain daily records of the pressure drop and scrubbing liquid flow rate for each scrubber. The Permittee shall include in its daily record when a flow rate reading is not taken and the reason for the lack of a low rate reading, (i.e. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Welding

- (k) Three (3) high frequency welding stations, identified as Mill #1, Mill #2, and Mill #3, constructed in 1991, 1992, and 1998, capacity: 4,921 inches of pipe per minute, each.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the three (3) high frequency welding stations, identified as Mill #1, Mill #2, and Mill #3, shall not exceed 50.2 pounds per hour, each, when operating at a process weight rate of 179,617 pounds per hour, each.

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.4.2 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 these facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**MINOR SOURCE OPERATING PERMIT
CERTIFICATION**

Source Name: Seymour Tubing, Inc.
Source Address: 1515 East Fourth Street, Seymour, Indiana 47274
Mailing Address: 1515 East Fourth Street, Seymour, Indiana 47274
Permit No.: MSOP 071-23131-00019

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**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).

Source Name:	Seymour Tubing, Inc.
Address:	1515 East Fourth Street
City:	Seymour, Indiana 47274
Phone #:	(812) 523-3638
MSOP #:	071-23131-00019

I hereby certify that Seymour Tubing, Inc. is

- still in operation.
- no longer in operation.

I hereby certify that Seymour Tubing, Inc. is

- in compliance with the requirements of MSOP 071-23131-00019.
- not in compliance with the requirements of MSOP 071-23131-00019.

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

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

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
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 PERMIT LIMIT OF _____

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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**

**Addendum to the
Technical Support Document for New Source Review and
a Minor Source Operating Permit Renewal**

Source Name: Seymour Tubing, Inc.
Source Location: 1515 East Fourth Street, Seymour, Indiana 47274
County: Jackson
Permit Renewal No.: MSOP 071-23131-00019
SIC Code: 3317
Permit Reviewer: CarrieAnn Paukowits

On April 26, 2007, the Office of Air Quality (OAQ) had a notice published in The Tribune, Seymour, Indiana, stating that Seymour Tubing, Inc. had applied for a permit renewal to continue to operate the carbon steel tubing manufacturing source. The notice also stated that OAQ proposed to issue a permit for this installation 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.

Upon further review, the OAQ has decided to make the following change to the permit. The permit language is changed as follows:

Change 1:

IDEM, OAQ has added mail codes to the addresses listed in the permit for the following: Permit Branch; Compliance Branch; Compliance Data Section; Technical Support and Modeling; and Asbestos Section.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a New Source Review and
Minor Source Operating Permit Renewal**

Source Background and Description

Source Name:	Seymour Tubing, Inc.
Source Location:	1515 East Fourth Street, Seymour, Indiana 47274
County:	Jackson
SIC Code:	3317
Operation Permit No.:	MSOP 071-12403-00019
Operation Permit Issuance Date:	August 20, 2001
Permit Renewal No.:	MSOP 071-23131-00019
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed an application from Seymour Tubing, Inc. relating to the operation of a carbon steel tubing manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Four (4) heated degreasing vats, two (2) constructed in 1989 and two (2) constructed in 1998, maximum usage rate: 105,773 pounds of cleaner per year, total.
- (b) Twelve (12) parts washers that are used to clean and coat metal with a rust preventative, using no photochemically reactive VOC, constructed in 1998, maximum usage rate: 1 gallon of rust preventive per month, each.
- (c) Two (2) rust prevention dip tanks, constructed in 1989 and 1998, using no photochemically reactive VOC, maximum usage rate: 23,926 gallons per year, total.
- (d) One (1) annealing furnace, identified as Furnace #1, constructed in 1989, heat input capacity: 1.25 million British thermal units per hour.
- (e) One (1) annealing furnace, identified as Furnace #2, constructed in 1998, heat input capacity: 6.5 million British thermal units per hour.
- (f) Two (2) natural gas-fired boilers, identified as Boiler #1 and Boiler #2, installed in 1998 and 1999, heat input capacity: 8.4 million British thermal units per hour, each.
- (g) Combustion units, constructed after 1989 and prior to 2002, not including boilers, with a total heat input capacity of 82.542 million British thermal units per hour.
- (h) Machining, where an aqueous cutting coolant continuously floods the machining interface, with a total coolant usage rate of 810 gallons per year (9,000 gallons when combined in solution with water), including:
 - (1) Twenty (20) cold cutting or rotary disc saws, constructed after 1989 and prior to 2001, capacity: 22 pounds of carbon steel tubing per hour, each.

- (2) One (1) bushing/chamfering machine, constructed after 1989 and prior to 2001, capacity: 26.4 pounds of carbon steel tubing per hour.
- (3) Ten (10) bushing/chamfering machines, constructed after 2000 and prior to 2007, capacity: 26.4 pounds of carbon steel tubing per hour, each.
- (i) One (1) pretreatment process, identified as Pretreatment Pickling Process #1, constructed in 1989, consisting of two (2) pickling vats, cold water rinse, phosphate coating, cold water rinse, neutralization and water soluble lubricant, equipped with a wet scrubber (Wet Scrubber #1) for particulate control, exhausting to Stack S-1, capacity: 7,300 pounds of carbon steel tubing per hour. The scrubber is equipped with a knitted mesh polypropylene demister.

The twelve (12) parts washers, two (2) rust prevention dip tanks, four (4) heated degreasing vats, ten (10) of the bushing/chamfering machines, two (2) natural gas-fired boilers and two (2) annealing furnaces were not included in a previous permit, but exempt from permitting requirements according to the rules in place when they were constructed.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (a) One (1) pretreatment process, identified as Pretreatment Pickling Process #2, constructed in 1998, consisting of two (2) pickling vats, cold water rinse, phosphate coating, cold water rinse, neutralization and water soluble lubricant, equipped with a wet scrubber (Wet Scrubber #2) for particulate control, exhausting to Stack S-2, capacity: 5,700 pounds of carbon steel tubing per hour. The scrubber is equipped with a knitted mesh polypropylene demister.
- (b) Three (3) high frequency welding stations, identified as Mill #1, Mill #2, and Mill #3, constructed in 1991, 1992, and 1998, capacity: 4,921 inches of pipe per minute, each.

New Emission Units and Pollution Control Equipment

There are no proposed emission units during this review process.

Existing Approvals

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

MSOP 071-12403-00019, issued on August 20, 2001

All terms and conditions from previous approvals were either incorporated as originally stated, revised or deleted by this MSOP Renewal.

The following terms and conditions have been removed:

- (a) Condition D.1.1: The total PM emissions from the pretreatment process (Pretreatment Pickling Process #1) is limited to less than 56.9 pounds per hour, equivalent to 249 tons per year to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

Condition D.1.6: Within twelve (12) months of issuance of this permit, in order to demonstrate compliance with Condition D.1.3 and to confirm the non-applicability of 326 IAC 2-7, the Permittee shall perform PM and PM₁₀ testing utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C - Performance Testing.

Reason not incorporated: The limit was included in the permit to allow for uncertainty in the potential emission rate. Unrestricted potential PM emissions, as calculated for this renewal, are much less than 250 tons per year, including all emission units. According to tests conducted on July 18, 2006, the controlled PM emission rate from Pretreatment Pickling Process #1 is 0.39 pound per hour. Thus, the control efficiency during the test would have had to be 99.31%, which is too high for this type of process, in order for the pre-controlled emissions to exceed 56.9 pounds per hour (56.9 pounds per hour x (1-0.9931) = 0.39 lbs/hr). Because the particulate is acid droplets, a size distribution could not be determined during the stack test. Therefore, all filterable and condensable PM was assumed to be PM₁₀, which is unlikely. The controlled PM₁₀ emission rate during the test was 0.63 pound per hour. The control efficiency during the test would have had to be 97.24%, which is also too high for this type of process, in order for the pre-controlled emissions to exceed 22.8 pounds per hour (less than 100 tons per year) (22.8 pounds per hour x (1-0.9724) = 0.63 lbs/hr). Therefore, no limit is required in order to render 326 IAC 2-2, PSD, or 326 IAC 2-7, Part 70, not applicable. In addition, the previous stack test demonstrated compliance with the limitation pursuant to 326 IAC 6-3-2. Therefore, no further testing is required.

- (b) Condition D.1.2: Pursuant to 326 IAC 6-2-4(a), the allowable PM emission rate from the two (2) boilers, identified as Boiler #1 and Boiler #2, shall not exceed 0.6 pound per million British thermal units per hour heat input, each.

Reason not incorporated: The boilers were replaced in 1998 and 1999 with new boilers. Those boilers are also subject to 326 IAC 6-2-4 (see "326 IAC 6-2" under the *State Rule Applicability - Individual Facilities* section of this document).

The following terms and conditions have been revised:

Condition D.1.3: Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the pretreatment process (Pretreatment Pickling Process #1) shall not exceed 8.07 pounds per hour when operating at a process weight rate of 5,500 pounds per hour.

Reason revised: During the tests conducted on July 18, 2006, it was determined that the maximum potential capacity is higher than 5,500 pounds per hour (7,300 pounds per hour). The capacity of this unit is corrected in this renewal, and the allowable emission rate is 9.94 pounds per hour (see "326 IAC 6-3-2" under the *State Rule Applicability - Individual Facilities* section of this document).

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

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 May 22, 2006, with additional information received on November 10, 2006, January 18, 2007, and February 20, 2007.

Emission Calculations

See Appendix A of this document for detailed emission calculations (6 pages).

Potential to Emit of the Source 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, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	70.7
PM ₁₀	71.3
SO ₂	0.281
VOC	7.90
CO	39.4
NO _x	46.9

HAPs	Potential to Emit (tons/yr)
Benzene	0.001
Formaldehyde	0.035
Hexane	0.844
Toluene	0.002
Nickel	0.001
Manganese	3.95
Diethanolamine	0.347
Dichlorobenzene, Lead, Cadmium, & Chromium	< 0.001, each
Total	5.18

The potential to emit of PM₁₀ and NO_x is greater than twenty-five (25) tons per year, each, the potential to emit all criteria pollutants is less than one hundred (100) tons per year, the potential to emit of any single HAP is less than ten (10) tons per year, and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP Renewal will be issued.

County Attainment Status

The source is located in Jackson County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Jackson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (b) Jackson County has been classified as unclassifiable or attainment for PM_{2.5}. 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 PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability - Entire Source section of this document.
- (c) Jackson County has been classified as attainment or unclassifiable in Indiana for all remaining 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 - Entire Source section of this document.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard.
- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Potential to Emit after Issuance

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

Pollutant	Emissions (tons/yr)
PM	70.7
PM ₁₀	71.3
SO ₂	0.281
VOC	7.90
CO	39.4
NO _x	46.9
Single HAP (Manganese)	3.95
Combination HAPs	5.18

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or greater and it is not in one of the twenty-eight (28) listed source categories.
- (b) Emissions in this table represent the unrestricted potential emissions from this source.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 071-23131-00019, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than one hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) the combination of HAPs is less than twenty-five (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 two (2) natural gas-fired boilers, identified as Boiler #1 and Boiler #2, have heat input capacities less than 250 million British thermal units per hour. Therefore, the requirements of the Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, 40 CFR 60, Subpart Da, are not included in the permit.
- (b) The two (2) natural gas-fired boilers, identified as Boiler #1 and Boiler #2, have heat input capacities less than 100 million British thermal units per hour. Therefore, the requirements of the Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db, are not included in the permit.

- (c) The two (2) natural gas-fired boilers, identified as Boiler #1 and Boiler #2, have heat input capacities less than 10 million British thermal units per hour. Therefore, the requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are not included in the permit.
- (d) This source is not a major source of HAPs and does not use HCl in the pickling process. Therefore, the requirements of 40 CFR Part 63, Subpart CCC--National Emission Standards for Hazardous Air Pollutants for Steel Pickling--HCl Process Facilities and Hydrochloric Acid Regeneration Plants Source, are not included in the permit.
- (e) The four (4) heated degreasing vats, twelve (12) parts washers, and two (2) rust prevention dip tanks do not use halogenated solvents. Therefore, the requirements of 326 IAC 20-6 and 40 CFR 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning, are not included in the permit.
- (f) This source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, are not included in the permit.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do 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 the 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.

State Rule Applicability – Individual Facilities

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

The unrestricted potential emissions of each attainment criteria pollutant are less than two hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-4.1-1 (New source toxics control)

The operation of carbon steel tubing manufacturing source will emit less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The two (2) natural gas-fired boilers, identified as Boiler #1 and Boiler #2, were constructed after September 21, 1983. Therefore, they are subject to 326 IAC 6-2-4, and particulate emissions shall be limited by the following equation:

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

Where:

- Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu 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.

For Q less than 10 mmBtu/hr, Pt shall not exceed 0.6. For Q greater than or equal to 10,000 mmBtu/hr, Pt shall not exceed 0.1.

- (a) The particulate emissions from the one (1) boiler, identified as Boiler #1, constructed in 1998, with a heat input capacity of 8.4 million British thermal units per hour, based on the equation is 0.6 pound per million British thermal unit ($Pt = 1.09 / 8.4^{0.26} = 0.6$).
- (b) When the one (1) boiler, identified as Boiler #2, with a heat input capacity of 8.4 million British thermal units per hour was constructed in 1999, the total heat input capacity became 16.8 million British thermal units per hour ($8.4 \times 2 = 16.8$). The particulate emissions from the one (1) boiler, identified as Boiler #2, shall not exceed 0.5 pound per million British thermal unit ($Pt = 1.09 / 16.8^{0.26} = 0.5$).

Based upon the emission factors in AP-42, the potential PM emissions when operating on natural gas are 0.0019 lb/MMBtu ($1.90 \text{ lb/MMCF} \times 1 \text{ MMcf}/1,000 \text{ MMBtu} = 0.0019 \text{ lb/MMBtu}$). Therefore, the two (2) boilers can comply with this rule.

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

- (a) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the one (1) pretreatment process, identified as Pretreatment Pickling Process #1, shall not exceed 9.76 pounds per hour when operating at a process weight rate of 7,300 pounds per hour. The unrestricted potential PM emission rate is 3.47 pounds per hour. Therefore, one (1) pretreatment process, identified as Pretreatment Pickling Process #1, can comply with this rule. Compliance tests were performed after control by the scrubber on July 18, 2006. The PM emissions were 0.39 pounds per hour after controls. Although the calculated potential emission rate before control is less than the allowable emission rate, the control will be required in place of pre-control testing. The pound per hour limitation was calculated with the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the one (1) pretreatment process, identified as Pretreatment Pickling Process #2, shall not exceed 8.27 pounds per hour when operating at a process weight rate of 5,700 pounds per hour. The unrestricted potential PM emission rate is 2.71 pounds per hour. Therefore, one (1) pretreatment process, identified as Pretreatment Pickling Process #2, can comply with this rule. Compliance tests were performed after control by the scrubber on July 19, 2006. The PM emissions were 0.03 pounds per hour after controls. Although the calculated potential emission rate before control is less than the allowable emission rate, the control will be required in place of pre-control testing. The pound per hour limitation was calculated with the following equation:

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

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

- (c) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the three (3) high frequency welding stations, identified as Mill #1, Mill #2, and Mill #3, shall not exceed 50.2 pounds per hour, each, when operating at a process weight rate of 179,617 pounds per hour (4,921 inches/minute x 2 tubes x 60 minutes/hr x 3.65 lbs/ft x 1 ft/12 inches) tons per hour, each. The unrestricted potential PM emission rate is 3.31 pounds per hour, each. Therefore, the three (3) high frequency welding stations can comply with this rule.

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (d) The potential emissions from the twenty (20) cold cutting or rotary disc saws, eleven (11) bushing/chamfering machines, and the combustion units are less than 0.551 pounds per hour, each. Therefore, pursuant to 326 IAC 6-3-1(b)(14), those processes are exempt from the requirements of 326 IAC 6-3.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The facilities at this source do not have the potential to emit more than ten (10) pounds per hour or twenty-five (25) tons per year of SO₂. Therefore, the requirements of 326 IAC 7-1.1 are not applicable.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The potential VOC emissions from each facility at this source are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Four (4) heated degreasing vats, one (1) constructed in 1989, and three (3) constructed in 1998, are cold cleaners because they contain an organic solvent at a temperature below the boiling point of the solvent which is used to clean or degrease the article. The degreasing vats do not have remote solvent reservoirs.

- (a) The four (4) degreasing vats were all constructed after January 1, 1980. Therefore, they are subject to the requirements of 326 IAC 8-3-2. The Permittee shall:
 - (1) equip the cleaner with a cover;
 - (2) equip the cleaner with a facility for draining cleaned parts;
 - (3) close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) provide a permanent, conspicuous label summarizing the operating requirements;
 - (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

- (b) The two (2) degreasing vats constructed after July 1, 1990, are also subject to 326 IAC 8-3-5, and must comply with the following:
 - (1) The Permittee shall ensure that the following control equipment requirements are met:
 - (A) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (i) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (ii) the solvent is agitated; or
 - (iii) the solvent is heated.
 - (B) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility

may be external for applications where an internal type cannot fit into the cleaning system.

- (C) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (D) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (E) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (ii) A water cover when solvent used is insoluble in, and heavier than, water.
 - (iii) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (2) The Permittee shall ensure that the following operating requirements are met:
- (A) Close the cover whenever articles are not being handled in the degreaser.
 - (B) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (C) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source commenced operation after January 1, 1980. Therefore, the requirements of 326 IAC 8-6 are not applicable.

326 IAC 9 (Carbon Monoxide Emission Limits)

There is no petroleum refining, ferrous metal smelting or refuse incineration at this source. Therefore, there is no emission limitations established in 326 IAC 9-2, and the requirements of 326 IAC 9 are not applicable.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

This source is not listed in 326 IAC 10-3 and the boilers do not have capacities of 250 million British thermal units. Therefore, the requirements of 326 IAC 10-3 are not applicable.

326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)

This source is not an electricity generating unit or large affected unit as described in 326 IAC 10-4-2. Therefore, the requirements of 326 IAC 10-4 are not applicable.

Compliance Requirements

Permits issued under 326 IAC 2-6.1 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The two (2) pretreatment pickling processes have applicable compliance monitoring conditions as specified below:

- (a) Visible emission notations of the pretreatment pickling processes stack exhausts (S-1 and S-2) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall record the pressure drop across the scrubber used in conjunction with the one (1) pretreatment process, identified as Pretreatment Pickling Process #1, at least once per day when the pretreatment pickling process is in operation. When for any one reading, the pressure drop across the scrubber is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee

shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (c) The Permittee shall record the pressure drop across the scrubber used in conjunction with the one (1) pretreatment process, identified as Pretreatment Pickling Process #2, at least once per day when the pretreatment pickling process is in operation. When for any one reading, the pressure drop across the scrubber is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (d) The Permittee shall record the scrubbing liquid flow rate of the scrubber used in conjunction with the one (1) pretreatment process, identified as Pretreatment Pickling Process #1, at least once per day when the pretreatment process is in operation. When for any one reading, the scrubbing liquid flow rate is less than 200 gallons per minute or a rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A flow rate that is below the minimum flow rate is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (e) The Permittee shall record the scrubbing liquid flow rate of the scrubber used in conjunction with the one (1) pretreatment process, identified as Pretreatment Pickling Process #2, at least once per day when the pretreatment process is in operation. When for any one reading, the scrubbing liquid flow rate is less than 25.6 gallons per minute or a rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A flow rate that is below the minimum flow rate is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (f) In the event of scrubber or demister failure, the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

These monitoring conditions are required for the two (2) pretreatment pickling processes in order to ensure that the scrubber is operating properly at all times. The scrubber must operate properly to in order for the two (2) pretreatment pickling processes to comply with 326 IAC 6-3-2, Particulate Emission Limitations for Manufacturing Processes.

Conclusion

The operation of this carbon steel tubing manufacturing source shall be subject to the conditions of the **New Source Review and Minor Source Operating Permit Renewal 071-23131-00019**.

Appendix A: Emissions Calculations
Acid Pickling

Page 1 of 6 TSD App A

Company Name: Seymour Tubing, Inc.
Address City IN Zip: 1515 East Fourth Street, Seymour, IN 47274
MSOP Renewal: 071-23131-00019
Reviewer: CarrieAnn Paukowits
Date: May 22, 2006

Pretreatment Pickling Process #1

CALCULATION

INPUT DATA

%w/v acid in tank liquid	10	
%w/v iron in tank liquid	5	
Tank freeboard, inches	14	distance from liquid surface to top of tank
Tons/h steel pickled	3.65	
Fume exhaust rate, cfm	50000	
% inhibition	90	if not known, use 90%
Foaming inhibitor?	n	
Plastic balls	n	
	1	

RESULTS

Free acid in exhaust air	9.9 mg/cu.m	1.85 lb/h
Iron in exhaust air	4.9 mg/cu.m	0.93 lb/h
Combined acid in exhaust air	8.7 mg/cu.m	1.62 lb/h
Total acid in exhaust air	18.5 mg/cu.m	3.47 lb/h
Total acid (PM/PM10 emissions)		15.21 tons/yr
Control Efficiency		90%
PM/PM10 emissions after control		1.52 tons/yr

INTERMEDIATE RESULTS

Overall correction factor	0.0629738
Hydrogen generation	627.78092 acfh
Liquid entrainment	0.1400976 lpm
Free acid in air	14009.764 mg/m
Iron in air	7004.882 mg/m
Combined acid in air	12258.544 mg/m
Total acid in air	26268.308 mg/m
Total volume of air	1416.4306 cu.m/m

Methodology

Calculation methodology by Esco Engineering, Kingsville, Ontario - March 1993

This method only applies to open tanks with lateral exhaust:

Calculations using typical tanks sizes, bubble sizes and air flows show that, of the sources of entrainment, only the aerosols formed by bursting of hydrogen bubbles contribute to entrainment into the fume exhaust system. The other sources create droplets that are too big to be picked up by the relatively low air velocities used on open tank exhaust

The emissions calculated are at the tank hood. Being droplets, they are subject to agglomeration and removal during passage through the ducting, and the load at the control device may be less

The emissions are long term average values. Instantaneous loads may be 3 to 6 times higher

The emission calculation uses the following rationale and data:

- uninhibited metal loss during pickling is 1.2% of metal (ref 1)
- hydrogen gas bubbles are 100 µm dia and the film is 1 µm thick (ref 1)
- the liquid in the top half of each bubble is fully entrained in the air stream
- foaming inhibitors suppress 90% of the aerosol generation
- plastic balls suppress 75% of the aerosol generation, per layer of balls
- the liquid surface in within 12" of the top of the tank

Appendix A: Emissions Calculations
Acid Pickling

Company Name: Seymour Tubing, Inc.
Address City IN Zip: 1515 East Fourth Street, Seymour, IN 47274
MSOP Renewal: 071-23131-00019
Reviewer: CarrieAnn Paukowits
Date: May 22, 2006

Pretreatment Pickling Process #2

CALCULATION

INPUT DATA

%w/v acid in tank liquid	10	
%w/v iron in tank liquid	5	
Tank freeboard, inches	14	distance from liquid surface to top of tank
Tons/h steel pickled	2.85	
Fume exhaust rate, cfm	10000	
% inhibition	90	if not known, use 90%
Foaming inhibitor:	n	
Plastic balls	n	
	1	

RESULTS

Free acid in exhaust air	38.6 mg/cu.m	1.45 lb/h
Iron in exhaust air	19.3 mg/cu.m	0.72 lb/h
Combined acid in exhaust air	33.8 mg/cu.m	1.26 lb/h
Total acid in exhaust air	72.4 mg/cu.m	2.71 lb/h
Total acid (PM/PM10 emissions)		11.87 tons/yr
Control Efficiency		90%
PM/PM10 emissions after control		1.19 tons/yr

INTERMEDIATE RESULTS

Overall correction factor	0.0629738
Hydrogen generation	490.1851 acfh
Liquid entrainment	0.1093913 lpm
Free acid in air	10939.131 mg/m
Iron in air	5469.5654 mg/m
Combined acid in air	9571.7395 mg/m
Total acid in air	20510.87 mg/m
Total volume of air	283.28612 cu.m/m

Methodology

Calculation methodology by Esco Engineering, Kingsville, Ontario - March 1993

This method only applies to open tanks with lateral exhaust:

Calculations using typical tanks sizes, bubble sizes and air flows show that, of the sources of entrainment, only the aerosols formed by bursting of hydrogen bubbles contribute to entrainment into the fume exhaust system. The other sources create droplets that are too big to be picked up by the relatively low air velocities used open tank exhaust

The emissions calculated are at the tank hood. Being droplets, they are subject to agglomeration and removal during passage through the ducting, and the load at a control device may be less

The emissions are long term average values. Instantaneous loads may be 3 to 6 times higher

The emission calculation uses the following rationale and data

uninhibited metal loss during pickling is 1.2% of metal (ref 1)
hydrogen gas bubbles are 100 µm dia and the film is 1 µm thick (ref 1)
the liquid in the top half of each bubble is fully entrained in the air stream
foaming inhibitors suppress 90% of the aerosol generation
plastic balls suppress 75% of the aerosol generation, per layer of balls
the liquid surface is within 12" of the top of the tank

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

**Company Name: Seymour Tubing, Inc.
Address City IN Zip: 1515 East Fourth Street, Seymour, IN 47274
MSOP Renewal: 071-23131-00019
Reviewer: CarrieAnn Paukowits
Date: May 22, 2006**

Pollutant

Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		

*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
One (1) boiler	8.40	73.58	0.070	0.280	0.022	3.679	0.202	3.091
One (1) boiler	8.40	73.58	0.070	0.280	0.022	3.679	0.202	3.091
Furnace #1	1.25	10.95	0.010	0.042	0.003	0.548	0.030	0.460
Furnace #2	6.50	56.94	0.054	0.216	0.017	2.847	0.157	2.391
Other Combustion Units	82.54	723.07	0.687	2.748	0.217	36.153	1.988	30.369
Total	24.55	215	0.204	0.82	0.065	10.8	0.59	9.0

HAPs - Organics

Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	0.0021	0.0012	0.0750	1.8000	0.0034
Potential Emission in tons/yr	0.0002	0.0001	0.008	0.194	0.0004

HAPs - Metals

Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
	0.0005	0.0011	0.0014	0.0004	0.0021	
Potential Emission in tons/yr	0.0001	0.0001	0.0002	0.0000	0.0002	0.203

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

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
VOC and HAP Emissions from Solvents, Coolants and Misc. Materials

Company Name: Seymour Tubing, Inc.
Address City IN Zip: 1515 East Fourth Street, Seymour, IN 47274
MSOP Renewal: 071-23131-00019
Reviewer: CarrieAnn Paukowits
Date: May 22, 2006

Process	Material	Density (lbs/gal)	Usage (gal/yr)	Usage (lbs/yr)	Weight % VOC	Explanation	PTE VOC (tons/yr)	Weight % HAP	PTE HAP (tons/yr)
Degreasing Vats	PARCO 3225X	10.4		105773	10%		5.29	0%	0.00
Rust Prevention	WOCOTEC3204	6.66	23926	159347.16	96%	All VOC is 142 solvent 66/3, which is nonphotochemically reactive	0.00	0%	0.00
Parts Washers	140 Solvent	6.66	144	959.04	100%		0.00	0%	0.00
Coolants									0.00
	Multan 3015	8.58	810	6949.8	40%		1.390	10%	0.347
	WS8035	8.58	810	6949.8	10%		0.347	0%	0.00
Total							7.03		0.347

The HAP for Multan 3015 is Diethanolamine

Methodology

PTE (tons/yr) = Density (lbs/gal) x Usage (gal/yr) x Weight % VOC x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations
Welding**

**Company Name: Seymour Tubing, Inc.
Address City IN Zip: 1515 East Fourth Street, Seymour, IN 47274
MSOP Renewal: 071-23131-00019
Reviewer: CarrieAnn Paukowits
Date: May 22, 2006**

Three (3) high frequency welding stations

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel)	3	601.19	0.0055	0.0005			9.920	0.902	0.000	0	0.902
EMISSION TOTALS											
Potential Emissions lbs/hr							9.92	0.90	0.00	0.00	0.90
Potential Emissions lbs/day							238.07	21.64	0.00	0.00	21.64
Potential Emissions tons/year							43.45	3.95	0.00	0.00	3.95

Weld rate (inches per minute)	Width of weld (mm)	Width of weld (inches)	Depth of weld for Two Pipes (mm)	Depth of weld (inches)	Volume of Weld Area (cub. in/min)
4921	6.5	0.256	4	0.157	198.32

Length of Each Pipe (Inches)	Diameter of Each Pipe (inches)	Pipe Wall Thickness (in)	Volume of Metal per Pipe (cub. in)	Weight of Pipe (lb/ft)	Density of Pipe (lb/cub. in)	Weight of Metal Displaced (lbs/hr)
48	2	0.256	144.48	3.65	0.025	300.60

METHODOLOGY

This high frequency welding does not consume weld wire or rod. Metal pipes are joined together through the welding process. In order to calculate emissions, the max electrode consumption per station is considered equal to the weight of the metal used to join the two pipes multiplied by a safety factor of 2.
 Weight of Metal Displaced (lbs/hr) = Volume of Weld Area Per Minute (cub. In.) x Density of Pipe (lb/cub. In)

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
 Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations
Summary**

Company Name: Seymour Tubing, Inc.
Address City IN Zip: 1515 East Fourth Street, Seymour, IN 47274
MSOP Renewal: 071-23131-00019
Reviewer: CarrieAnn Paukowits
Date: May 22, 2006

Process	PM	PM10	SO2	NOx	VOC	CO
Pickling Line 1	15.2	15.2	0.00	0.00	0.00	0.00
Pickling Line 2	11.9	11.9	0.00	0.00	0.00	0.00
Combustion	0.204	0.82	0.065	10.8	0.59	9.0
Welding	43.4	43.4	0.00	0.00	0.00	0.00
Degreasing Vats	0.00	0.00	0.00	0.00	5.29	0.00
Rust Prevention	0.00	0.00	0.00	0.00	0.00	0.00
Parts Washers	0.00	0.00	0.00	0.00	0.00	0.00
Coolants	0.00	0.00	0.00	0.00	1.74	0.00
Total	70.7	71.3	0.065	10.8	7.62	9.0

Process	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	Diethanol-amine	Total
Pickling Line 1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pickling Line 2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Combustion	0.0002	0.0001	0.0081	0.1936	0.0004	0.0001	0.0001	0.0002	0.0000	0.0002	0.00	0.203
Welding	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.95	0.00	0.00	3.95
Degreasing Vats	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Rust Prevention	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parts Washers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coolants	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.347	0.347
Total	0.000	0.0001	0.008	0.194	0.000	0.0001	0.0001	0.0002	3.95	0.000	0.347	4.50