INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 8, 2008

RE: Plymouth Tube Company / 131-26866-00014

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

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

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07

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September 8, 2008

Emil Webber
Plymouth Tube Company
572 West State Road 14
Winamac, IN 46996

Re: 131-26866-00014
Third Notice-Only Change to
M131-21846-00014

Dear Emil Webber:

Plymouth Tube Company was issued a Minor Source Operating Permit (MSOP) Renewal No. M131-21846-00014 on January 9, 2007, for a stationary seamless steel pipe and tube production source located at 572 West State Road 14, Winamac, IN 46996. On August 13, 2008, the Office of Air Quality (OAQ) received an application relating to the changes as listed below:

(1) Addition of a new annealing furnace described as follows:
One (1) natural gas-fired annealing furnace, identified as EU01C-Annealing Furnace, constructed in 2008, exhausting to stacks F, G, H and roof exhaust fan C8, rated at 22 Million British thermal units per hour, capacity: 9.0 tons per hour of steel.

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

(3) Increasing the heat input capacity of the existing natural-gas fired annealing furnace, identified as EU01A-3, by 2.52 Million British thermal units per hour.

(4) Increasing the heat input capacity of the existing natural-gas fired annealing furnace, identified as EU01A-2, by 15.66 Million British thermal units per hour.

Pursuant to 326 IAC 2-6.1-6(d)(13), the MSOP is hereby revised as described in the attached Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit and Technical Support Document. A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mehul Sura, of my staff, at 317-234-5377 or 1-800-451-6027, and ask for extension 4-5377.

Sincerely,

Original signed by

Iryn Calilung, Section Chief
Permits Branch

Office of Air Quality

Attachments: Revised Permit
Technical Support Document

cc: File - Pulaski County
Pulaski County Health Department
U.S. EPA, Region V
Air Compliance Section
Compliance Data Section
Technical Support and Modeling
Permits Administrative and Development
Billing, Licensing and Training Section

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MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

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

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

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

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

Operation Permit No.: MSOP 131-21846-00014	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: January 9, 2007 Expiration Date: January 9, 2017

First Notice-Only Change No.: 131-25709-00014, issued on February 7, 2008
Second Notice-Only Change No.: 131-26589-00014, issued on June 2, 2008

Third Notice-Only Change No.: 131-26866-00014	
Issued by:Original signed by Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 8, 2008 Expiration Date: January 9, 2017

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	572 W. State Road 14, Winamac, IN 46996
Mailing Address:	572 W. State Road 14, Winamac, IN 46996
General Source Phone:	574-946-3125
SIC Code:	3317
County Location:	Pulaski
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 listed sources

A.2 Emissions Units and Pollution Control Equipment Summary

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

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

(1) One (1) natural gas-fired annealing furnace rated at 10.8 Million British thermal unit per hour, known as EU01A-3, modified in 2008, exhausting to stack D22 with annealing chamber exhausting to stacks F, G and H, capacity: 5.0 tons per hour of steel;

(2) One (1) natural gas-fired annealing furnace rated at 25.2 Million British thermal unit per hour, known as EU01A-2, modified in 2008, exhausted to stack C19 with annealing chamber exhausting to stacks C, D and E, capacity: 7.5 tons per hour of steel;

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

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

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

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

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

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

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

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

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

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

(2) One (1) natural gas-fired annealing furnace, known as EU01C-Annealing Furnace, constructed in 2008, exhausting to stacks F, G, H and roof exhaust fan C8, rated at 22 Million British thermal units per hour, capacity: 9.0 tons per hour of steel;

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M131-21846-00014, is issued for a fixed term of ten (10) 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, 46204-2251

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

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

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

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

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

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

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

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

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

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

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

(b) Any application requesting an amendment or modification of this permit shall be submitted to:
Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

B.15 Source Modification Requirement

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

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

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

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

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

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

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

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

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

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

(b) Any application requesting a change in the ownership or operational control of the source
(c) 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
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Violation of any conditions of this permit.

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
MC 61-52 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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.7 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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

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

percent (20%) of full scale.

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

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

C.11 Malfunctions Report [326 IAC 1-6-2]

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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.

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

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

(1) One (1) natural gas-fired annealing furnace rated at 10.8 Million British thermal unit per hour, known as EU01A-3, modified in 2008, exhausting to stack D22 with annealing chamber exhausting to stacks F, G and H, capacity: 5.0 tons per hour of steel;

(2) One (1) natural gas-fired annealing furnace rated at 25.2 Million British thermal unit per hour, known as EU01A-2, modified in 1988, exhausted to stack C19 with annealing chamber exhausting to stacks C, D and E, capacity: 7.5 tons per hour of steel;

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

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

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

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

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

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

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

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

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

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

(2) One (1) natural gas-fired annealing furnace, known as EU01C-Annealing Furnace, constructed in 2008, exhausting to stacks F, G, H and roof exhaust fan C8, rated at 22 Million British thermal units per hour, capacity: 9.0 tons per hour of steel;

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

(c) Continued:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Emission Limitations and Standards

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

(a) Pursuant to 326 IAC 6-2-4, the PM emissions from EU01A-Boiler 2, shall not exceed 0.657 pound per million British thermal units.

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

(c) Pursuant to 326 IAC 6-2-4, the PM emissions from EU01C-Boiler 1 and EU01C-Boiler 2, shall each not exceed 0.493 pound per million British thermal units.

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

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

SECTION E.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

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

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

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

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

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

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

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

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

What this Subpart Covers?

§ 60.40c Applicability and delegation of authority.

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

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

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

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

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

§ 60.41c Definitions.

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

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

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

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

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

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

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

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

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

§ 60.48c Reporting and recordkeeping requirements.

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

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

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

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

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

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

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

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

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

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

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

I hereby certify that Plymouth Tube Company is
☐ in compliance with the requirements of MSOP 131-21846-00014.
☐ not in compliance with the requirements of MSOP 131-21846-00014.

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

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

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Plymouth Tube Company**
Source Location:	**572 West State Road 14, Winamac, IN 46996**
County:	**Pulaski**
SIC Code:	**3317**
Operation Permit No.:	**M131-21846-00014**
Operation Permit Issuance Date:	**January 1, 2007**
Notice-Only Change No.:	**131-26866-00014**
Permit Reviewer:	**Mehul Sura**

On August 13, 2008, the Office of Air Quality (OAQ) has received an application from Plymouth Tube Company related to a modification to an existing stationary seamless steel pipe and tube production source.

Existing Approvals

The source was issued MSOP Renewal No. 131-21846-00014 on January 1, 2007. The source has since received the following approvals:

(a) First Notice-Only Change No. 131-25709-00014, issued on February 7, 2008
(b) Second Notice-Only Change No. 131-26589-00014, issued on June 2, 2008

County Attainment Status

The source is located in Pulaski County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards

(1) 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.

(2) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are

considered when evaluating the rule applicability relating to ozone. Pulaski County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
Pulaski County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants
Pulaski County has been classified as attainment or unclassifiable in Indiana for SO_2, CO, O_3, PM10 and NOx. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

(a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

(b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Total PTE of Entire Source	1.34	5.35	5.35	0.42	70.36	3.87	59.10	1.33	1.27
Title V Major Source Thresholds	NA	100	--	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
These emissions are based upon MSOP Renewal No. 131-21846-00014 issued on January 1, 2007.									

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Plymouth Tube Company on August 13, 2008, relating to the changes as listed below:

(1) Addition of a new annealing furnace described as follows:
One (1) natural gas-fired annealing furnace, identified as EU01C-Annealing Furnace, constructed in 2008, exhausting to stacks F, G, H and roof exhaust fan C8, rated at 22 Million British thermal units per hour, capacity: 9.0 tons per hour of steel.

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

Note: The heat input capacity of this annealing furnace was erroneously specified as 44.8 Million British thermal units per day in the MSOP Renewal No. 131-21846-00014 on January 1, 2007. However, for the purpose of determining the permit level of this revision the heat input capacity 44.8 Million British thermal units per hour has been used.

(3) Increasing the heat input capacity of the existing natural-gas fired annealing furnace, identified as EU01A-3, by 2.52 Million British thermal units per hour.

(4) Increasing the heat input capacity of the existing natural-gas fired annealing furnace, identified as EU01A-2, by 15.66 Million British thermal units per hour.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

	PTE of Proposed Revision (tons/year)								
Modification	PM	PM10*	PM2.5**	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Addition of a new annealing furnace, identified as EU01C	0.73	0.73	0.73	0.1	9.64	0.53	8.09	0.18	0.17
Increase of the heat input capacity of the existing natural-gas fired annealing furnace, identified as EU01A-3	0.08	0.08	0.08	negligible	1.10	0.06	0.93	0.021	0.02
Increase of the heat input capacity of the existing natural-gas fired annealing furnace, identified as EU01A-2	0.52	0.52	0.52	negligible	6.86	0.38	5.76	0.13	0.12
Removing existing annealing furnace, identified as EU01C	1.49	1.49	1.49	0.1	19.62	1.08	16.48	0.37	0.35
Total PTE of Proposed Revision	(0.15)	(0.15)	(0.15)	(0.01)	(2.02)	(0.11)	(1.70)	(0.038)	(0.036)
Title V Major Source Thresholds	NA	100	--	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

( ) - Values within bracket shows the amount by which the PTE (tons/year) is decreased. Please refer Appendix A of this TSD for detailed emission calculations.

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

** US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

There is no emission increase of any of the pollutants due to this modification. This MSOP is being revised through a notice-only change as pursuant to 326 IAC 2-6.1-6(d)(13) because this modification adds a new emission unit (new annealing furnace, identified as EU01C) of the same type that are already permitted under MSOP Renewal No. 131-21846-00014, and the new emission unit will comply with the same applicable requirements and permit terms and conditions as the existing annealing furnaces at the source.

PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM10/PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Total PTE of Entire Source	~~1.34~~ **1.19**	~~5.35~~ **5.2**	~~0.42~~ **0.41**	~~70.36~~ **68.34**	~~3.87~~ **3.76**	~~59.10~~ **57.4**	~~1.33~~ **1.3**	~~1.27~~ **1.24**

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Total PTE of Entire Source	1.19	5.2	5.2	0.41	68.34	3.76	57.4	1.3	1.24
Title V Major Source Thresholds	NA	100	--	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

MSOP Status
This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

Federal Rule Applicability Determination

There are no new Federal Rule applicable to the source due to this modification.

State Rule Applicability Determination

There are no new state rules applicable to the source due to this modification.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: 131-21846-00014, issued on January 1, 2007.

Proposed Changes

The permit (MSOP No: 131-21846-00014) has been revised as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

A.2 Emissions Units and Pollution Control Equipment Summary

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

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

(1) One (1) natural gas-fired annealing furnace rated at ~~8.28~~**10.8** Million British thermal unit per hour, known as EU01A-3, ~~installed in September, 1988~~**modified in 2008**, exhausting to stack D22 with annealing chamber exhausting to stacks F, G and H, capacity: 5.0 tons per hour of steel;

(2) One (1) natural gas-fired annealing furnace rated at ~~9.54~~**25.2** Million British thermal unit per hour, known as EU01A-2, ~~installed in September 1988~~**modified in 2008**, exhausted to stack C19 with annealing chamber exhausting to stacks C, D and E, capacity: 7.5 tons per hour of steel;

. . .

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

. . .

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

(2) One (1) natural gas-fired annealing furnace, known as EU01C-Annealing Furnace, constructed in 2008, exhausting to stacks F, G, H and roof exhaust fan C8, rated at 22 Million British thermal units per hour, capacity: 9.0 tons per hour of steel;

. . .

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

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

(1) One (1) natural gas-fired annealing furnace rated at ~~8.28~~**10.8** Million British thermal unit per hour, known as EU01A-3, ~~installed in September, 1988~~**modified in 2008**, exhausting to stack D22 with annealing chamber exhausting to stacks F, G and H, capacity: 5.0 tons per hour of steel;

(2) One (1) natural gas-fired annealing furnace rated at ~~9.54~~**25.8** Million British thermal unit per hour, known as EU01A-2, ~~installed in September 1988~~**modified in 2008**, exhausted to stack C19 with annealing chamber exhausting to stacks C, D and E, capacity: 7.5 tons per hour of steel;

. . .

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

. . .

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

(2) One (1) natural gas-fired annealing furnace, known as EU01C-Annealing Furnace, constructed in 2008, exhausting to stacks F, G, H and roof exhaust fan C8, rated at 22 Million British thermal units per hour, capacity: 9.0 tons per hour of steel;

. . .

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

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application submitted by the applicant. An application for the purposes of this review was received on *August 13, 2008.*

The operation of this proposed revision shall be subject to the conditions of the attached MSOP Notice-Only Change No. 131-26866-00014. The staff recommends to the Commissioner that this MSOP Notice-Only Change be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Mehul Sura at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.

(b) A copy of the findings is available on the Internet at: www.in.gov/idem/permits/air/pending.html.

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem/permits/guide/.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100

Company Name: Plymouth Tube Company
Address City IN Zip: 572 West State Road 14, Winamac, IN 46996
Notice-Only Change No.: 131-26866-00014
Reviewer: Mehul Sura
Date: September 2, 2008

Modification	Total Heat Input Capacity	Potential Throughput
	MMBtu/hr	MMCF/yr
Addition of a new annealing furnace, identified as EU01C	22.0	192.7
Increasing the heat input capacity of the existing natural-gas fired annealing furnace, identified as EU01A-3	2.5	22.1
Increasing heat input capacity of the existing natural-gas fired annealing furnace, identified as EU01A-2	15.7	137.2
Removing existing annealing furnace, identified as EU01C	44.8	392.4

	Emission Factor in lb/MMCF															
	Criteria Pollutant						HAPs									
	PM*	PM10/PM2.5*	SO2	Nox**	VOC	CO	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel
	7.6	7.6	0.6	100.0	5.5	84.0	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
	Potential Emission in tons/yr															
Addition of a new annealing furnace, identified as EU01C	0.73	0.73	0.1	9.64	0.53	8.09	2.0E-04	1.2E-04	7.2E-03	1.7E-01	3.3E-04	4.8E-05	1.1E-04	1.3E-04	3.7E-05	2.0E-04
Increase of the heat input capacity of the existing natural-gas fired annealing furnace, identified as EU01A-3	0.08	0.08	6.6E-03	1.10	0.06	0.93	2.3E-05	1.3E-05	8.3E-04	2.0E-02	3.8E-05	5.5E-06	1.2E-05	1.5E-05	4.2E-06	2.3E-05
Increase of the heat input capacity of the existing natural-gas fired annealing furnace, identified as EU01A-2	0.52	0.52	4.1E-02	6.86	0.38	5.76	1.4E-04	8.2E-05	5.1E-03	1.2E-01	2.3E-04	3.4E-05	7.5E-05	9.6E-05	2.6E-05	1.4E-04
Removing existing annealing furnace, identified as EU01C	1.49	1.49	0.1	19.62	1.08	16.48	4.1E-04	2.4E-04	1.5E-02	3.5E-01	6.7E-04	9.8E-05	2.2E-04	2.7E-04	7.5E-05	4.1E-04
Total for the modification ***	**0.15**	**0.15**	**0.01**	**2.02**	**0.11**	**1.70**	**4.2E-05**	**2.4E-05**	**1.5E-03**	**3.6E-02**	**6.9E-05**	**1.0E-05**	**2.2E-05**	**2.8E-05**	**7.7E-06**	**4.2E-05**

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined. PM10 emissions used as a surrogate for PM2.5 emissions.
**Emission Factors for NO_x: Uncontrolled = 100
*** The source-wide PTE of each of the pollutants is decreased due to the modification. The amount by which the source-wide PTE is decreased is shown in the Total for the modification.

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 from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
Potential Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Total for the modification = [Total potential emission increase due to the new annealing furnace, identified as EU01C and increased heat input capacity of EU01A-3 and EU01A-2] - [Potential emission decrease due to removing existing annealing furnace, identified as EU01C]