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: November 9, 2012

RE: Seymour Tubing, Inc. / 071-32410-00019

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mr. Nathan Goode
Seymour Tubing, Inc.
1515 East Fourth Street
Seymour, Indiana 47274

November 9, 2012

Re: 071-32410-00019
First Administrative Amendment to
MSOP Renewal No.: M071-23131-00019

Dear Mr. Goode:

Seymour Tubing, Inc. was issued a Minor Source Operating Permit (MSOP) Renewal on June 4, 2007, for a carbon steel tubing manufacturing source. A letter requesting changes to this permit was received on October 11, 2012. The source requested that the permit be updated to install a recut heated degreasing vat (recut vat #2), install a high frequency welding station (Mill #4), and to modify an existing recut heated degreasing vat (recut vat #1).

1. Installation of new recut heated degreasing vat (recut vat #2)
Pursuant to 326 IAC 2-6.1-6(d)(8), this change to the permit is considered an administrative amendment because the permit is amended to incorporate a modification that adds an emissions unit or units of the same type that is already permitted or replaces an existing unit and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit, and the modification does not result in a potential to emit greater than the thresholds in 326 IAC 2-2 (PSD) or 326 IAC 2-3 (Emission Offset) or would result in a potential to emit equal to or greater than the thresholds in 326 IAC 2-7 (Part 70 Operating Permit).

   The uncontrolled/unlimited potential to emit of the entire source after the addition of this emission unit will continue to be within the threshold levels specified in 326 IAC 2-6.1 (MSOP). See Appendix A for the revised PTE of the source after the addition of this emission unit.

2. Installation of new high frequency welding station (Mill #4)
Pursuant to 326 IAC 2-6.1-6(d)(8), this change to the permit is considered an administrative amendment because the permit is amended to incorporate a modification that adds an emissions unit or units of the same type that is already permitted or replaces an existing unit and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit, and the modification does not result in a potential to emit greater than the thresholds in 326 IAC 2-2 (PSD) or 326 IAC 2-3 (Emission Offset) or would result in a potential to emit equal to or greater than the thresholds in 326 IAC 2-7 (Part 70 Operating Permit).

   The uncontrolled/unlimited potential to emit of the entire source after the addition of this emission unit will continue to be within the threshold levels specified in 326 IAC 2-6.1 (MSOP). See Appendix A for the revised PTE of the source after the addition of this emission unit.

3. Descriptive update of recut heated degreasing vat (recut vat #1)
Pursuant to 326 IAC 2-6.1-6(d)(2)(A), this change to the permit is considered an administrative amendment because the permit is amended to change the descriptive information concerning the source of emissions unit, where the revision will not trigger a new application requirement.

The uncontrolled/unlimited potential to emit of the entire source after the removal of this emission unit will continue to be within the threshold levels specified in 326 IAC 2-6.1 (MSOP). See Appendix A for the revised limited PTE of the source after the removal of the existing emission unit.

4. Update to Source Industrial Classification (SIC) Code
Previously, the permit stated the SIC Code of 3547. The source has notified IDEM, OAQ that the correct SIC Code for their operations is 3317. Pursuant to 326 2-6.1-6(d)(2), this change to the permit is considered an administrative amendment because it is a minor administrative change.

Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, GHGs emissions are subject to regulation at a source with a potential to emit of 100,000 tons per year or more of CO2e. Therefore, CO2e emissions have been calculated for this source. Based on the calculations, the PTE greenhouse gases from this entire source is less than 100,000 tons of CO2e per year (see TSD Appendix A for detailed calculations).

In addition, the applicability of the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources [40 CFR 63, Subpart JJJJJJ] for the two (2) boilers was evaluated since they meet the definition of an industrial boiler under 40 CFR 63.11237. However, pursuant to 40 CFR 63.11195(e), these boilers are not subject to this rule because they are gas-fired. Therefore, the requirements of the NESHAP are not included in the permit.

Summary of Permit Changes

The changes listed below have been made to MSOP No. 017-32410-00019. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(1) SIC Code Update

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
General Source Phone Number:	(812) 523-3638
SIC Code:	~~3547~~ **3317**
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

(2) Changes to Emission Unit Descriptions:

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) **Degreasing Vats:**

(1) Three (3) heated degreasing vats, two (2) constructed in 1989 and one (1) constructed in 1998, and were modified in 2008 by using non-VOC solvent, maximum usage rate: 105,773 pounds of cleaner per year, total.

(2) One (1) "Recut" heated degreasing vat **(recut vat #1)**, constructed in 1998, and ~~modified in 2009 to use Parco3225X solvent~~ **permitted in 2012 for modification**

to use non-VOC solvent, maximum usage rate: 52,640 gallons of cleaner per year.

(3) One (1) "Recut" heated degreasing vat (recut vat #2), permitted in 2012 for construction, using Parco3225X solvent, maximum usage rate: 52,640 gallons of cleaner per year.

(b) - (k) ...

(l) **Welding Stations:**

(1) 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.

(2) One (1) high frequency welding station, identified as Mill #4, permitted in 2012 for construction, capacity: 4,921 inches of pipe per minute.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description ~~[326 IAC 2-7-5(15)]~~ **[326 IAC 2-6.1-5(a)(1)]**:

(a) **Degreasing Vats:**

(1) Three (3) heated degreasing vats, two (2) constructed in 1989 and one (1) constructed in 1998, and were modified in 2008 by using non-VOC solvent, maximum usage rate: 105,773 pounds of cleaner per year, total.

(2) One (1) "Recut" heated degreasing vat **(recut vat #1)**, constructed in 1998, and ~~modified in 2009 to use Parco3225X solvent~~ **permitted in 2012 for modification to use non-VOC solvent**, maximum usage rate: 52,640 gallons of cleaner per year.

(3) One (1) "Recut" heated degreasing vat (recut vat #2), permitted in 2012 for construction, using Parco3225X solvent, maximum usage rate: 52,640 gallons of cleaner per year.

(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.1.1 VOC Limit [326 IAC 8-1-1]

Pursuant to 326 IAC 8-1-1(b), the recut heated degreasing vat **#2** shall use less than fifteen (15) pounds per day of VOC, including dilution solvents and cleaning solvents. Compliance with this limit makes 326 IAC 8-3-2 and 326 IAC 8-3-5 not applicable.

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

D.1.2 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records for the total VOC usage for the degreaser each day. These records shall be taken as stated below and shall be complete and sufficient to establish compliance status with the VOC usage limit for the degreasing vat:

(1) The VOC content of the solvent used.

(2) The amount of solvent used on a daily basis.

(3) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description ~~326 IAC 2-7-5(15)]~~ **[326 IAC 2-6.1-5(a)(1)]**: Boilers

(g) 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.)

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description ~~[326 IAC 2-7-5(15)]~~ **[326 IAC 2-6.1-5(a)(1)]**: Pretreatment

(j) 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.

(k) 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.)

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description ~~[326 IAC 2-7-5(15)]~~ **[326 IAC 2-6.1-5(a)(1)]**: Welding

(l) **Welding Stations:**

(1) 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.

(2) One (1) high frequency welding station, identified as Mill #4, permitted in 2012 for construction, capacity: 4,921 inches of pipe per minute.

(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)]~~ **[326 IAC 2-6.1-5(a)(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 **and Mill #4**, 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:

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

D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these emission units. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance Plan required by this condition.

All other conditions of the permit shall remain unchanged and in effect. A copy of this permit is available on the Internet at: www.in.gov/ai/appfiles/idem-caats/.

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 Kimberly Cottrell, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Kimberly Cottrell or extension (3-0870), or dial (317) 233-0870.

Sincerely,

Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

Attachments:
Updated Permit; PTE Calculations

JLA/klc

cc: File – Jackson County
Jackson County Health Department
U.S. EPA, Region V
Southeast Regional Office
Compliance and Enforcement Branch
Interested Parties

Christopher J. Bishop, LPG
Cardno ATC
7988 Centerpoint Drive, Suite 100
Indianapolis, IN 46256

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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.: M071-23131-00019	
Issued by: original issued by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 4, 2007 Expiration Date: June 4, 2017

First Notice Only Change No.: 071-28011-00019 issued on October 27, 2008
Second Notice Only Change No.: 071-27869-00019 issued on May 29, 2009
Third Notice Only Change No.: 071-29705-00019 issued on October 14, 2010

Administrative Amendment No.: 071-32410-00019	
Issued by: Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 9, 2012 Expiration Date: June 4, 2017

TABLE OF CONTENTS

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
General Source Phone Number:	(812) 523-3638
SIC Code:	3317
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) Degreasing Vats:

(1) Three (3) heated degreasing vats, two (2) constructed in 1989 and one (1) constructed in 1998, and were modified in 2008 by using non-VOC solvent, maximum usage rate: 105,773 pounds of cleaner per year, total.

(2) One (1) "Recut" heated degreasing vat (recut vat #1), constructed in 1998, and permitted in 2012 for modification to use non-VOC solvent, maximum usage rate: 52,640 gallons of cleaner per year.

(3) One (1) "Recut" heated degreasing vat (recut vat #1), permitted in 2012 for construction, using Parco3225X solvent, maximum usage rate: 52,640 gallons of cleaner per year.

(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) One (1) annealing furnace, identified as Furnace #3, approved for construction in 2010, heat input capacity: 2.87 million British thermal units per hour.

(g) 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.

(h) 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.

(i) 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.

(j) 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.

(k) 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.

(l) Welding Stations:

(1) 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.

(2) One (1) high frequency welding station, identified as Mill #4, permitted in 2012 for construction, capacity: 4,921 inches of pipe per minute.

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, M071-23131-00019, 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. 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 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:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
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.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The Permittee shall implement the PMPs.

(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.

(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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M071-23131-00019 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.11 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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 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 an affirmation that the statements in the application are true and complete 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
Permit Administration and Support Section, 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 one hundred twenty (120) 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, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 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] [IC 13-17-3-2] [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.16 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
Permit Administration and Support Section, 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 an affirmation that the statements in the application are true and complete 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.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.

(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.18 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 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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.

(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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(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 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.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to 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 excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning 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 normal or usual manner of operation.

(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; and/or

(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 record the reasonable response steps taken.

C.13 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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.

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

C.14 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.15 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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 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 and Enforcement Branch, 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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 UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1-5(a)(1)]:

(a) Degreasing Vats:

(1) Three (3) heated degreasing vats, two (2) constructed in 1989 and one (1) constructed in 1998, and were modified in 2008 by using non-VOC solvent, maximum usage rate: 105,773 pounds of cleaner per year, total.

(2) One (1) "Recut" heated degreasing vat (recut vat #1), constructed in 1998, and permitted in 2012 for modification to use non-VOC solvent, maximum usage rate: 52,640 gallons of cleaner per year.

(3) One (1) "Recut" heated degreasing vat (recut vat #2),, permitted in 2012 for construction, using Parco3225X solvent, maximum usage rate: 52,640 gallons of cleaner per year.

(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.1.1 VOC Limit [326 IAC 8-1-1]

Pursuant to 326 IAC 8-1-1(b), the recut heated degreasing vat #2 shall use less than fifteen (15) pounds per day of VOC, including dilution solvents and cleaning solvents. Compliance with this limit makes 326 IAC 8-3-2 and 326 IAC 8-3-5 not applicable.

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

D.1.2 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records for the total VOC usage for the degreaser each day. These records shall be taken as stated below and shall be complete and sufficient to establish compliance status with the VOC usage limit for the degreasing vat:

(1) The VOC content of the solvent used.

(2) The amount of solvent used on a daily basis.

(3) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1-5(a)(1)]: Boilers

(g) 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:

$Pt = 1.09/Q^{0.26}$

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.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1-5(a)(1)]: Pretreatment

(j) 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.

(k) 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:

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

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these emission units. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance Plan required by this condition.

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. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps 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) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition**.**

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1-5(a)(1)]: Welding

(l) Welding Stations:

(1) 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.

(2) One (1) high frequency welding station, identified as Mill #4, permitted in 2012 for construction, capacity: 4,921 inches of pipe per minute.

(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.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, Mill #3, and Mill #4, 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:

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

D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these emission units. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance Plan required by this condition.

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
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 and Enforcement 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:

_____
_____

Summary of Emission Calculations

Company Name: Seymour Tubing, Inc.
Address City IN Zip: 1515 East Fourth Street, Seymour, IN 47274
County: Jackson
SIC / NAICS Code: 3317 33121
Operating Permit Renewal No.: M071-23131-00019
Issuance Date: June 4, 2007
Administrative Amendment No.: 071-32410-00019
Permit Reviewer: Kimberly Cottrell
Date: November 8, 2012

The tables below summarize the potential to emit calculations submitted by Seymour Tubing, Inc. The subsequent pages of this document contain the calculations provided by Seymour Tubing, Inc. IDEM has reviewed these calculations and verified their accuracy.

Potential to Emit - New Construction (ton/yr)

Process	CO	NO_X	PM	PM_{10}	$PM_{2.5}$	SO_2	VOC	GHG as CO_2e	Hexane	Mn	Glycol Ethers	Diethanol-amine	Total
Recut Heated, Vat #2	--	--	--	--	--	--	2.74	--	--	--	2.74	--	2.74
Mill #4	--	--	2.65	2.65	2.65	--	--	--	--	0.24	--	--	0.24
Total	0	0	2.65	2.65	2.65	0	2.74	0	0	0.24	2.74	0	2.98

Entire Source Potential to Emit (ton/yr)

Process	CO	NO_X	PM	PM_{10}	$PM_{2.5}$	SO_2	VOC	GHG as CO_2e	Hexane	Mn	Diethanol-amine	Diethanol-amine	Total
Pickling Line 1	--	--	15.21	15.21	15.21	--	--	--	--	--	--	--	--
Pickling Line 2	--	--	11.87	11.87	11.87	--	--	--	--	--	--	--	--
Combustion	10.09	12.01	0.23	0.91	0.91	0.07	0.66	58,148	0.87	--	--	--	0.91
Welding	--	--	49.82	49.82	49.82	--	--	--	--	4.53	--	--	4.53
Degreasing Vats	--	--	--	--	--	--	2.74	--	--	--	--	--	3
Rust Prevention	--	--	--	--	--	--	0	--	--	--	--	--	0
Parts Washers	--	--	--	--	--	--	0	--	--	--	--	--	0
Coolants	--	--	--	--	--	--	1.74	--	--	--	0.10	0.35	0.35
Total	10.09	12.01	77.13	77.81	77.81	0.072	5.14	58,148	0.87	4.53	0.10	0.35	8.53

Acid Pickling
Pretreatment Pickling Process #1

Company Name:	Seymour Tubing, Inc.
Address City IN Zip:	1515 East Fourth Street, Seymour, IN 47274
County:	Jackson
SIC / NAICS Code:	3317 33121
Operating Permit Renewal No.:	M071-23131-00019
Issuance Date:	June 4, 2007
Administrative Amendment No.:	071-32410-00019
Permit Reviewer:	Kimberly Cottrell
Date:	November 8, 2012

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	0.062973761	
Hydrogen generated	627.7809233	acfh
Liquid entrained	0.140097641	lpm
Free acid in air	14009.76408	mg/m
Iron in air	7004.882038	mg/m
Combined acid in air	12258.54357	mg/m
Total acid in air	26268.30764	mg/m
Total volume of air	1416.430595	cu.m/m

PROCESS WEIGHT RATE (326 IAC 6-3-2)

$E = 4.10\ P^{0.67}$ E = 9.76 lb/hr

where

E = rate of emission in pounds per hour; and	P =	7300	lb/hr
P = process weight rate in tons per hour		3.65	ton/hr

Methodology

Calculation methodology by Esco Engineering, Kingsville, Ontario - March 1993
This method only applies to open tanks with lateral exhaust.

Acid Pickling
Pretreatment Pickling Process #1

Calculations using typical tanks sizes, bubble sizes and air flows show that, of these 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 for 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 2)
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.

Acid Pickling
Pretreatment Pickling Process #2

Company Name:	Seymour Tubing, Inc.
Address City IN Zip:	1515 East Fourth Street, Seymour, IN 47274
County:	Jackson
SIC / NAICS Code:	3317 33121
Operating Permit Renewal No.:	M071-23131-00019
Issuance Date:	June 4, 2007
Administrative Amendment No.:	071-32410-00019
Permit Reviewer:	Kimberly Cottrell
Date:	November 8, 2012

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	0.062973761	
Hydrogen generated	490.1851045	acfh
Liquid entrained	0.109391309	lpm
Free acid in air	10939.13085	mg/m
Iron in air	5469.565427	mg/m
Combined acid in air	9571.739496	mg/m
Total acid in air	20510.87035	mg/m
Total volume of air	283.286119	cu.m/m

PROCESS WEIGHT RATE (326 IAC 6-3-2)

$E = 4.10\ P^{0.67}$ E = 8.27 lb/hr

where

E = rate of emission in pounds per hour; and	P =	5700	lb/hr
P = process weight rate in tons per hour		2.85	ton/hr

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 these 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 for open tank exhaust.

Acid Pickling
Pretreatment Pickling Process #2

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 2)
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.

Natural Gas Combustion

MM BTU/HR <100

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Permit Reviewer: Kimberly Cottrell
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Equipment	**Heat Input Capacity** (MMBtu/hr)	**Potential Throughput** (MMCF/yr)
Boiler #1	8.40	73.58
Boiler #2	8.40	73.58
Furnace #1	1.25	10.95
Furnace #2	6.50	56.94
Furnace #3	2.87	25.14
Other Combustion Units	82.54	723.07
Total	**24.55**	**215.06**

Potential Emission in tons/yr							
Equipment	**CO**	**NO_X**	**PM***	**PM_{10}***	**$PM_{2.5}$***	**SO_2**	**VOC**
Emission Factor in lb/MMCF	*84.0*	*100* **	*1.90*	*7.60*	*7.60*	*0.600*	*5.50*
Boiler #1	3.091	3.679	0.070	0.280	0.280	0.022	0.202
Boiler #2	3.091	3.679	0.070	0.280	0.280	0.022	0.202
Furnace #1	0.460	0.548	0.010	0.042	0.042	0.003	0.030
Furnace #2	2.391	2.847	0.054	0.216	0.216	0.017	0.157
Furnace #3	1.056	1.257	0.024	0.096	0.096	0.008	0.069
Other Combustion Units	30.369	36.153	0.687	2.748	2.748	0.217	1.988
Total	**10.09**	**12.01**	**0.23**	**0.91**	**0.91**	**0.072**	**0.66**

*PM emission factor is filterable PM only. PM_{10} and $PM_{2.5}$ emission factors are filterable and condensable PM combined.

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

Natural Gas Combustion

MM BTU/HR <100

	HAPs - Organics				
	Benzene	**Dichloro-benzene**	**Formal-dehyde**	**Hexane**	**Toluene**
Emission Factor in lb/MMcf	*0.0021*	*0.0012*	*0.075*	*1.8*	*0.0034*
Boiler #1	7.7E-05	4.4E-05	2.8E-03	0.066	1.3E-04
Boiler #2	7.7E-05	4.4E-05	2.8E-03	0.066	1.3E-04
Furnace #1	1.1E-05	6.6E-06	4.1E-04	0.010	1.9E-05
Furnace #2	6.0E-05	3.4E-05	2.1E-03	0.051	9.7E-05
Furnace #3	2.6E-05	1.5E-05	9.4E-04	0.023	4.3E-05
Other Combustion Units	7.6E-04	4.3E-04	2.7E-02	0.65	1.2E-03
Total	**1.0E-03**	**5.8E-04**	**3.6E-02**	**0.87**	**1.6E-03**

	HAPs - Metals					Total HAPs
	Pb	**Cd**	**Cr**	**Mn**	**Ni**	
Emission Factor in lb/MMcf	*0.0005*	*0.0011*	*0.0014*	*0.0004*	*0.0021*	
Boiler #1	1.8E-05	4.0E-05	5.2E-05	1.4E-05	7.7E-05	0.069
Boiler #2	1.8E-05	4.0E-05	5.2E-05	1.4E-05	7.7E-05	0.069
Furnace #1	2.7E-06	6.0E-06	7.7E-06	2.1E-06	1.1E-05	0.010
Furnace #2	1.4E-05	3.1E-05	4.0E-05	1.1E-05	6.0E-05	0.054
Furnace #3	6.3E-06	1.4E-05	1.8E-05	4.8E-06	2.6E-05	0.024
Other Combustion Units	1.8E-04	4.0E-04	5.1E-04	1.4E-04	7.6E-04	0.68
Total	**2.4E-04**	**5.3E-04**	**6.7E-04**	**1.8E-04**	**1.0E-03**	**0.91**

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

	Greenhouse Gas		
	CO_2	**CH_4**	**N_2O**
Emission Factor in lb/MMcf	*120,000*	*2.3*	*2.2*
Potential Emission in tons/yr			
Boiler #1	4,415	0.085	0.081
Boiler #2	4,415	0.085	0.081
Furnace #1	657	0.013	0.012
Furnace #2	3,416	0.065	0.063
Furnace #3	1,508	0.029	0.028
Other Combustion Units	43,384	0.832	0.795
Summed Potential Emissions in tons/yr	57,798		
CO2e Total in tons/yr	58,148		

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
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
The N_2O Emission Factor for uncontrolled is 2.2. The N_2O Emission Factor for low Nox burner is 0.64.
CO_2e (ton/yr) = CO_2 Potential Emission (ton/yr) x CO_2 GWP + CH4 Potential Emission (ton/yr) x CH_4 GWP + N_2O Potential Emissic

Welding

Company Name: Seymour Tubing, Inc.
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County: Jackson
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Issuance Date: June 4, 2007
Administrative Amendment No.: 071-32410-00019
Permit Reviewer: Kimberly Cottrell
Date: November 8, 2012

PROCESS	Number of Stations	Max. electrode consumption per station	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING		(lbs/hr)	PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Mill #1	1	601.19	0.0055	0.0005			3.31	0.30	0	0	0.30
Mill #2	1	601.19	0.0055	0.0005			3.31	0.30	0	0	0.30
Mill #3	1	384.83	0.0055	0.0005			2.12	0.19	0	0	0.19
Mill #4	**1**	**480.98**	**0.0055**	**0.0005**			**2.65**	**0.24**	**0**	**0**	**0.24**
Total # stations (Metal Inert Gas (MIG)(carbon steel))	4	2,068.20									

EMISSION TOTALS	Potential Emissions lbs/hr	11.38	1.03	0	0	1.03
	Potential Emissions lbs/day	273.00	24.82	0	0	24.82
	Potential Emissions tons/year	49.82	4.53	0	0	4.53

Process	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)	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)
Mill #1	4921	6.5	0.256	4	0.157	198.32	48	2	0.256	144.48	3.65	0.025	300.60
Mill #2	4921	6.5	0.256	4	0.157	198.32	48	2	0.256	144.48	3.65	0.025	300.60
Mill #3	3150	6.5	0.256	4	0.157	126.94	48	2	0.256	144.48	3.65	0.025	192.42
Mill #4	3937	6.5	0.256	4	0.157	158.66	48	2	0.256	144.48	3.65	0.025	240.49

METHODOLOGY

This high frequency welding does not consume weld wire or rod. Metal pipes are joined together through the welding process.

Welding

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

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.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1

PROCESS WEIGHT RATE (326 IAC 6-3-2)

$$E = 55.0\ P^{0.11} - 40$$

where

E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

	P =		E =
	lb/hr	ton/hr	lb/hr
Mill #1	179,617	89.81	50.2
Mill #2	179,617	89.81	50.2
Mill #3	179,617	89.81	50.2
Mill #4	179,617	89.81	50.2

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

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County: Jackson
SIC / NAICS Code: 3317 33121
Operating Permit Renewal No.: M071-23131-00019
Issuance Date: June 4, 2007
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Permit Reviewer: Kimberly Cottrell
Date: November 8, 2012

Process	Material	Density (lbs/gal)	Usage (gal/yr)	Usage (lbs/yr)	Weight % VOC	PTE VOC (tons/yr)	PTE VOC (lb/day)	Weight % HAP	PTE HAP (tons/yr)
Degreasing Vats									
Vat #1	PARCO 2087X	11.3	9,395	105,773	0%	0	0	0%	0
Vat #2	PARCO 2087X	11.3			0%	0	0	0%	0
Vat #3	PARCO 2087X	11.3			0%	0	0	0%	0
Recut Heated, Vat #1	PARCO 2087X	11.3	52,640	592,674	0%	0	0	0%	0
Recut Heated, Vat #2	**PARCO 3225X**	**10.4**	**52,640**	**548,772**	**1%**	**2.74**	**15.03**	**1%**	**2.74**
Rust Prevention	WOCOTEC3204	6.66	23,926	159,347	96%	0	0	0%	0
Parts Washers	140 Solvent	6.66	144	959	100%	0	0	0%	0
Coolants	Multan 3015	8.58	810	6,950	40%	1.39	7.62	10%	0.35
	WS8035	8.58	810	6,950	10%	0.35	1.90	0%	0
Total						**4.48**	**24.56**		**3.09**

Notes
PARCO CLEANER 2087X does not contain VOC or HAP.
The HAP for PARCO CLEANER 3225X is diethylene glycol monobutyl ether (glycol ether)
WOCOTEC3204 does not contain HAP. VOCs from this material are not photochemically reactive (142 solvent 66/3).
140 Solvent does not contain HAP. VOCs from this material are not photochemically reactive (142 solvent 66/3).
The HAP for Multan 3015 is Diethanolamine
WS8035 does not contain HAP.

Methodology
PTE (tons/yr) = Density (lbs/gal) x Usage (gal/yr) x Weight % VOC (or HAP) x 1 ton/2,000 lbs
PTE (lb/day) = PTE (ton/yr) x 2000 lb/ton / 365 days/yr

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Nathan Goode
Seymour Tubing, Inc.
1515 E Fourth St
Seymour, IN 47274

DATE: November 9, 2012

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

SUBJECT: Final Decision
MSOP
089-32410-00019

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Christopher J Bishop (Cardno ATC)
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Mail Code 61-53

IDEM Staff	CDENNY 11/9/2012 Seymour Tubing, Inc. 071-32410-00019 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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2		Jackson County Commissioner Jackson County Courthouse Brownstown IN 47220 *(Local Official)*									
3		Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 *(Affected Party)*									
4		Mr. Tome Earnhart 3960 N. CR 300 W. North Vernon IN 47265 *(Affected Party)*									
5		Seymour City Council and Mayors Office 301 North Chestnut Street Seymour IN 47274 *(Local Official)*									
6		Jackson County Health Department 801 West 2nd Street Seymour IN 47274-2711 *(Health Department)*									
7		Mr. Christopher Bishop ATC Associates Inc. 7988 Centerpoint Drive Indianapolis IN 46256 *(Consultant)*									
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