



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Northwest Regional Office • 330 W. US Highway 30, Suite F • Valparaiso, IN 46385

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

August 12, 2024

VIA ELECTRONIC MAIL

Jimmy Canfield
Witt Galvanizing - Plymouth
2631 Jim Neu Drive
Plymouth, Indiana 46563
jimmycanfield@azz.com

Re: Inspection Summary/Violation Letter
Witt Galvanizing - Plymouth
Source ID 099-00081
Plymouth, Marshall County

Dear Jimmy Canfield:

On August 5, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Witt Galvanizing - Plymouth, located at 2631 Jim Neu Drive in Plymouth, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Inspection Type: Commitment
Inspection Results: Violations were observed

At the time of the inspection, the following violations were noted:

- 1) Witt Galvanizing – Plymouth failed to submit their 2022 Annual Notification, in violation of Condition B.5 of the company's Registration. Witt Galvanizing – Plymouth has since submitted their 2022 Annual Notification on 8/7/2024.

The Office of Air Quality will not take legal action at this time. However, any such violation in the future may result in legal action being pursued. Please direct any questions to Sarah Ling, Compliance Inspector, at 219-730-6982 or by email at sling@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

Charles Breitenfeldt, Deputy Director
Northwest Regional Office
Office of Air Quality

ACES ID: 300450, 300451

ENCLOSURE

cc: Sarah Ling, Compliance and Enforcement Branch, Office of Air Quality
Marshall County Health Department, Paul Shumaker, pauls@co.marshall.in.us

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT**



SOURCE INFORMATION	
SOURCE NAME	Witt Galvanizing - Plymouth
SOURCE LOCATION	2631 Jim Neu Drive, Plymouth, Indiana Marshall County
MAILING ADDRESS	2631 Jim Neu Drive, Plymouth, Indiana 46563
PLANT ID	099-00081
<u>PERMIT INFORMATION</u>	Permit Type: Registration Permit Number: 099-26301-00081 Permit Expiration Date: N/A VFC Document No.(hyperlink): 43665494
ATTAINMENT STATUS	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO ₂ <input type="checkbox"/> CO <input type="checkbox"/> O ₃ <input type="checkbox"/> NO ₂ <input type="checkbox"/> Pb <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5}
SOURCE STATUS	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input checked="" type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	The Registrant owns and operates a stationary hot dip galvanizing operation.

INSPECTION INFORMATION			
INSPECTED BY	Sarah Ling		
INSPECTION DATE AND TIME	August 5, 2024	TIME IN: 10:45 AM	TIME OUT: 12:00 PM
REPORTED BY	Sarah Ling	REPORT DATE: 8/12/2024	
<u>COMPLIANCE PERIOD REVIEWED</u>	12/18/2007 to Current		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input type="checkbox"/> Compliance Monitoring Strategy (CMS) <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Other:	<input checked="" type="checkbox"/> Commitment <input type="checkbox"/> Complaint <input type="checkbox"/> Surveillance	
ACES TRACKING NUMBER(S)	Inspection: 300450	Complaint: N/A	Violation/Warning: 300451
RM TRACKING NUMBER(S)	Complaint: N/A		
<u>INSPECTION BACKGROUND</u>	The last compliance inspection was conducted on 12/17/2007 and no violations were observed.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Jimmy Canfield	Plant Manager	574-935-4500	jimmycanfield@azz.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
N/A	N/A	N/A	N/A

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	Action Taken	Describe Violation(s)	
N/A	N/A	N/A	
Formal Enforcement Actions			
Case Number	Enforcement Type	Civil Penalty	Describe Violation(s)
N/A	N/A	\$ N/A	N/A
Other Relevant Actions			
Action Taken	Comments		
N/A	N/A		

PERMIT SECTION D.1		
Emission Units and Control Devices:		
(a)	One (1) natural gas-fired galvanizing kettle, which has a heat input capacity of 9.5 million Btu per hour (MMBtu/hr);	
(b)	Welding operations, one (1) Metal Inert Gas (MIG) welding, which has a maximum hourly rate of 1 pound per hour, and one (1) welding stick, which has capacity of 6.0 electrode per hour, and an oxyacetylene flame-cutting operation, rated at 20 feet per hour. Welding operations including the oxyacetylene flame-cutting operation are used for maintenance purposes.	
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
Applicable Rules:		
<ul style="list-style-type: none"> Particulate Matter (PM) [326 IAC 6-3-2] 		
Requirement	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Compliance Determination Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Recordkeeping Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Types of Records Reviewed: N/A		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Observations and Comments:		
I arrived at Witt Galvanizing – Plymouth at approximately 10:45 AM and during vehicular observations, no visible emissions or other violations were observed. Upon entering the facility, I was greeted by Mr. Jimmy Canfield, and I explained the purpose of my visit. During the opening conference, I asked Mr. Canfield how many hours the facility operates, and Mr. Canfield stated the facility operates in two (2), eight (8) hour, shifts per day, five (5) days per week. I then asked Mr. Canfield to review the emission units within the A and D Sections of the company’s Registration for accuracy. Mr. Canfield stated that the emission units within Section D of the company’s Registration were accurate. While reviewing Section A.2 of the company’s Registration, Mr. Canfield stated that the facility has five (5) hydrochloric acid pickling tanks, not four (4) as the Registration denotes. It was noted that the fifth pickling tank was installed eight		

PERMIT SECTION D.1
<p>to ten (8-10) years ago. Mr. Canfield also noted that the one (1) ferrous chloride storage tank has been removed from the facility. I recommended that during the next Registration revision that the source amend the emission units to reflect the accurate emission units on site.</p> <p>There are no recordkeeping requirements for Section D.1 of the company's Registration, therefore, no records were reviewed.</p> <p>I then explained I would now need to conduct a site tour of the facility. Mr. Canfield escorted me throughout the facility. The natural gas-fired galvanizing kettle was operational at the time of the inspection. The temperature of the kettle at the time of the inspection was 836° F. No violations were observed.</p>
Permit Section Compliance Status:
<p><input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection.</p> <p><input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:</p>

ADDITIONAL SOURCE COMPLIANCE REVIEW:
<p>The following reports are required and were reviewed:</p> <p><input type="checkbox"/> Annual Compliance Certification(s) <input type="checkbox"/> Deviation & Compliance Monitoring Report(s)</p> <p><input checked="" type="checkbox"/> Annual Notification(s) <input type="checkbox"/> Emission Statement(s)</p>
<p>The reports are consistent with inspection observations. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>The permit accurately represents emission units observed on site. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>Compliance assistance was provided during the inspection. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>The source is required to have a Risk Management Plan [40 CFR 68]. <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p style="padding-left: 20px;">If yes, the source has a plan. <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p> <p style="padding-left: 20px;">If yes, the employees have been trained. <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<u>Additional Information and Comments:</u>
<p>During inspection preparation, it was discovered that Witt Galvanizing – Plymouth failed to submit their 2022 Annual Notification, which is a violation of Condition B.5 of the company's Registration.</p> <p>As mentioned in Section D.1 Observations and Comments, the facility houses five (5) hydrochloric acid pickling tanks, not four (4) as the Registration denotes. Additionally, the one (1) ferrous chloride storage tank has been removed from the facility.</p> <p>During the inspection, it was discovered that the facility has a cold cleaner degreaser that uses a VOC containing solvent. I reviewed the Safety Data Sheet and the solvent's vapor pressure was below the 1.0 millimeter of mercury threshold. During the site tour, the degreaser was not in operation. The lid was closed, there was a device for drying parts, and there was a permanent conspicuous label. No violations of 326 IAC 8-3 were observed or determined.</p> <p>I recommended that during the next Registration revision that the source amend the emission units to reflect the accurate emission units on site, including the addition of the fifth pickling tank and cold cleaner degreaser and the removal of the ferrous chloride storage tank.</p>
Additional Source Compliance Review Status:
<p><input type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection.</p> <p><input checked="" type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:</p> <ul style="list-style-type: none"> • Witt Galvanizing – Plymouth failed to submit their 2022 Annual Notification, in violation of Condition B.5 of the company's Registration. Witt Galvanizing – Plymouth has since submitted their 2022 Annual Notification on 8/7/2024.

INSPECTION FINDINGS	
<input type="checkbox"/> No violations were observed or determined at the time of the inspection.	
<input checked="" type="checkbox"/> The following violations were determined at the time of the inspection:	
<ul style="list-style-type: none">Witt Galvanizing – Plymouth failed to submit their 2022 Annual Notification, in violation of Condition B.5 of the company's Registration. Witt Galvanizing – Plymouth has since submitted their 2022 Annual Notification on 8/7/2024.	
RECOMMENDED ACTION	Issue inspection summary/violation letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Jimmy Canfield4 prior to exiting the facility.

ATTACHMENTS	
<ul style="list-style-type: none">N/A	