

### INSPECTION REPORT

|                                        |                                                                                      |                          |
|----------------------------------------|--------------------------------------------------------------------------------------|--------------------------|
| <b>Inspection Date:</b>                | 8/23/2022                                                                            | Inspection Announced: No |
| <b>Time:</b>                           | Entry: 11:40 AM (EST)                                                                | Exit: 3:50 PM (EST)      |
| <b>Media:</b>                          | Water                                                                                |                          |
| <b>Statute (s)/Program(s):</b>         | Clean Water Act, National Pollutant Discharge Elimination System (NPDES), Industrial |                          |
| <b>Type of inspection:</b>             | Compliance Evaluation Inspection                                                     |                          |
| <b>Access:</b>                         | Granted                                                                              |                          |
|                                        |                                                                                      |                          |
| <b>Permittee Name:</b>                 | Plymouth Tube Co.                                                                    |                          |
| <b>Facility or Site Name:</b>          | Plymouth Tube Co.                                                                    |                          |
| <b>Facility/Site Physical Address:</b> | 572 W State Road 14                                                                  |                          |
| <b>(city, state, zip code)</b>         | Winamac, Indiana 46996                                                               |                          |
| <b>County/Parish:</b>                  | Pulaski                                                                              |                          |
|                                        |                                                                                      |                          |
| <b>Permit Number:</b>                  | INP000240                                                                            |                          |

| Persons Participating in Inspection:      |                 |                |                         |                               |                               |
|-------------------------------------------|-----------------|----------------|-------------------------|-------------------------------|-------------------------------|
| Title                                     | Name            | Phone          | Email                   | Present at Opening Conference | Present at Closing Conference |
| Physical Scientist, EPA                   | Matthew Schulte | (312) 886-2405 | schulte.matthew@epa.gov | Yes                           | Yes                           |
| Environmental Engineer, EPA               | Newton Ellens   | (312) 353-5562 | Ellens.newton@epa.gov   | Yes                           | Yes                           |
| Stormwater Specialist - IDEM              | Rob Beck        | (317) 690-8805 | rbeck@idem.in.gov       | Yes                           | Yes                           |
| Wastewater Inspector - IDEM               | Margaret Hayes  | (219) 246-6148 | mhayes@idem.in.gov      | Yes                           | No                            |
| Wastewater Inspector - IDEM               | Aaron Deeter    | (317) 691-1915 | adeeter@idem.in.gov     | Yes                           | No                            |
| Corporate Environmental and Safety Manger | Jenna Griffith  | (574) 946-3125 | jmgriffith@plymouth.com | Yes                           | No                            |

| Persons Participating in Inspection: |              |                |                       |     |     |
|--------------------------------------|--------------|----------------|-----------------------|-----|-----|
| Director of Operations               | Ricky Searcy | (574) 946-3125 | -                     | Yes | No  |
| Environmental Coordinator            | Dawn Pickett | (574) 946-3125 | dpickett@plymouth.com | No  | Yes |

|                                                        |             |                                                                            |                |
|--------------------------------------------------------|-------------|----------------------------------------------------------------------------|----------------|
| <b>Lead Inspector:</b>                                 |             |                                                                            |                |
| Matthew Schulte                                        |             |                                                                            |                |
|                                                        | Region 5    | schulte.matthew@epa.gov                                                    | (312) 886-2405 |
| <b>Additional Persons Participating in Inspection:</b> |             |                                                                            |                |
| Newton Ellens                                          | Region 5    | hodaj.andi@epa.gov                                                         | 312-353-4645   |
| <b>Supervisor Review:</b>                              |             |                                                                            |                |
| Molly Smith                                            | MOLLY SMITH | Digitally signed by<br>MOLLY SMITH<br>Date: 2022.10.25<br>20:32:10 -05'00' |                |
|                                                        | Region 5    | smith.molly@epa.gov                                                        | (312) 353-8773 |

## SECTION I – INTRODUCTION

### Site Entry and Inspection Objectives

Region 5 Lead Inspector, Matthew Schulte, and inspector Newton Ellens arrived at Plymouth Tube Co. (the “Site” or “Facility”), located at 572 W. State Road 14, Indiana, at 11:40 AM (EST) on August 23, 2022, for an unannounced inspection. Inspectors presented their credentials to Ricky Searcy and informed the Facility that this was an EPA Region 5 inspection to determine compliance with the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) permit program. The inspection was conducted under the authority of the CWA NPDES permit program and Section 308 of the CWA. The table above identifies the attendees that participated in the inspection.

This report is based on information supplied by Facility representatives, observations made by the Region 5 inspectors, and records and reports maintained by the permittee and Region 5. These include the following: direct observations made by the Region 5 inspectors, photographs taken by Region 5 inspectors, physical

evidence collected by Region 5 inspectors, measurements taken by Region 5 inspectors, verbal or written statements made or supplied by Facility representatives (the permittee) during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the Region 5 inspectors by Facility representatives during or subsequent to the on-site inspection. In addition, information gathered prior to or subsequent to the inspection from a review of U.S. EPA, State, and public records may be included in this report.

**Facility/Site Description**

Region 5 Lead Inspector confirmed the following Facility information:

The Facility is a specialty manufacturer of carbon alloy, nickel alloy, and stainless precision steel tubing. The Facility operates five days a week, Monday through Friday, for 24 hours a day and produces wastewater primarily through its hot mill pickle tanks and quench and temper process. The maximum daily flow that the facility estimates is 25,000 gallons per day.

Roughly 100,000 pounds of material is brought to the Facility on flatbed trucks daily. The Facility is currently undergoing an operational change focused on increasing their production rates due to the closure of the Plymouth Tube Co. Facility located in Streator, Illinois. This operational change has resulted in an increase in the amount of material being processed at the Facility, but has not involved an increase in the amount of wastewater being generated.

Stormwater that falls on site is directed towards the North end of the facility towards stormwater outfall 001. Any wastewater generated on site is treated in batch tanks before being discharged to the City.

**SECTION II – OBSERVATIONS**

Observations may not be in sequential order.

| <b>Unique Identifying No.</b> | <b>Observation</b>                                                                                                                                 | <b>Area of Concern?</b> |
|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| <b>MS5-OB-001</b>             | Calibrations for daily pH readings are not recorded.                                                                                               | Yes                     |
| <b>MS5-OB-002</b>             | Daily pH readings are taken 3 times a day. A monthly monitoring sheet is recorded and provided to the City containing the pH and flow readings.    | No                      |
| <b>MS5-OB-003</b>             | Secondary containment is present for all acid and rinse tanks on-site.                                                                             | No                      |
| <b>MS5-OB-004</b>             | Stormwater samples are taken at a culvert located within the plant upstream from Outfall 001.                                                      | Yes                     |
| <b>MS5-OB-005</b>             | Facility has experienced past zinc exceedances                                                                                                     | Yes                     |
| <b>MS5-OB-006</b>             | Facility is currently in the process of ramping up production processes resulting in increased material being processed with the same water usage. | Yes                     |
| <b>MS5-OB-007</b>             | The scale pit and cooling tower are on closed loop system. Well water is used to replenish and water lost to evaporation on an as-needed basis.    | No                      |

### SECTION III - AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

| No.        |                                                                                                                                                                                                                                                                                   |
|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MS5-OB-001 | Calibrations for daily pH readings are performed daily, but are not recorded.<br><br>All calibrations should be recorded and include the date and time for when they are performed.                                                                                               |
| MS5-OB-004 | Stormwater samples are taken at a culvert located within the plant upstream from Outfall 001.<br><br>Samples taken should be taken at the specified outfall location and be representative of the Facility's discharge.                                                           |
| MS5-OB-005 | Facility has experienced zinc effluent exceedances.<br><br>Facility experienced an 81 percent exceedance of zinc for its monthly average in July 2022. Facility should ensure that all discharges are in compliance with their Permit.                                            |
| MS5-OB-006 | Facility is currently in the process of ramping up production processes resulting in increased material being processed with the same water usage.<br><br>Facility may need to reevaluate its production based limits contained in their Permit to reflect this operation change. |

### SECTION IV – CLOSING CONFERENCE AND FOLLOW UP

#### Closing Conference

The Lead Inspector held a closing conference with Facility personnel on August 23, 2022, for the inspection. During the closing conference, the Lead Inspector discussed the observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

#### Follow Up

The following items were requested by the inspector at the time of the inspection:

- Letter of Sufficiency showing coverage under the State's General Stormwater Permit
- Stormwater Pollution Prevention Plan (SWPPP) – Received by email on September 21, 2022.
- Chain of custodies for the last sampling events done for both stormwater and industrial wastewater – Received by email on September 21, 2022.
- Copy of the last stormwater site inspection performed under the SWPPP – Received by email on September 21, 2022.
- Spill Prevention Control and Countermeasure (SPCC) plan – Received by email on September 21, 2022.
- Copy of the last annual inspection required by the SPCC plan – Received by email on September 21, 2022.

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- Copy of the wastewater industrial permit – Received by email on September 21, 2022, however, file corrupted and unable to open.
- Discharge Monitoring Reports for the past year and flow – not received.
- Meter Calibration record or last purchase record of new meter/installation – Received by email on September 21, 2022.
- Calculation of production rates for the past year – Received by email on September 21, 2022.

## **SECTION V – LIST OF APPENDICES**

Appendix 1 – Photo Log [times listed on images are in Eastern Standard Time (EST)]

|                                                                                                           |                          |                                                                                     |                                             |
|-----------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------------------------------------------------------|---------------------------------------------|
| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996 |                          | <b>Photographer:</b><br>Newton Ellens                                               | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                          |  |                                             |
| <b>Photo No.:</b> 1                                                                                       | <b>Time:</b><br>1: 47 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b>                                                                             |                          |                                                                                     |                                             |
| <b>Photo Description:</b><br>Open grating for any spills to contain water in closed loop system.          |                          |                                                                                     |                                             |
|                                                                                                           |                          | <b>File:</b> plymouth_001.JPG                                                       |                                             |

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| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.:</b> 2                                                                                       | <b>Time:</b><br>1:50 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b>                                                                             |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Scale Pit.                                                                   |                         |                                                                                     |                                             |
|                                                                                                           |                         | File: plymouth_002.JPG                                                              |                                             |

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| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996 |                         | <b>Photographer:</b><br>Newton Ellens                                               | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.:</b> 3                                                                                       | <b>Time:</b><br>1:51 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> South                                                                       |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Scale Hopper hauled every 6 weeks.                                           |                         |                                                                                     |                                             |
|                                                                                                           |                         | File: plymouth_003.JPG                                                              |                                             |

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| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                      |  |                                             |
| <b>Photo No.:</b> 4                                                                                       | <b>Time:</b> 1:54 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> East                                                                        |                      |                                                                                     |                                             |
| <b>Photo Description:</b><br>Cooling tower automatic refuel station.                                      |                      |                                                                                     |                                             |
| <b>File:</b> plymouth_004.JPG                                                                             |                      |                                                                                     |                                             |

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| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996 |                      | <b>Photographer:</b><br>Newton Ellens                                               | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                      |  |                                             |
| <b>Photo No.:</b> 5                                                                                       | <b>Time:</b> 1:56 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> South                                                                       |                      |                                                                                     |                                             |
| <b>Photo Description:</b><br>Lift station on the north side of Facility to sanitary.                      |                      |                                                                                     |                                             |
|                                                                                                           |                      | 08/23/2022 13:56                                                                    |                                             |
|                                                                                                           |                      | File: plymouth_005.JPG                                                              |                                             |

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| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996 |                      | <b>Photographer:</b><br>Newton Ellens                                               | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                      |  |                                             |
| <b>Photo No.:</b> 6                                                                                       | <b>Time:</b> 1:56 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> North                                                                       |                      |                                                                                     |                                             |
| <b>Photo Description:</b><br>Diesel Station with secondary containment.                                   |                      |                                                                                     |                                             |
|                                                                                                           |                      | File: plymouth_006.JPG                                                              |                                             |

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| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.:</b> 7                                                                                       | <b>Time:</b><br>2:06 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> South                                                                       |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Acid and rinse tanks with open grating to capture and hold any spills.       |                         |                                                                                     |                                             |
|                                                                                                           |                         | File: plymouth_007.JPG                                                              |                                             |

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|-----------------------------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------|---------------------------------------------|
| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996                   |                         | <b>Photographer:</b><br>Newton Ellens                                               | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                                              |                         |  |                                             |
| <b>Photo No.:</b> 8                                                                                                         | <b>Time:</b><br>2:06 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> South                                                                                         |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Acid and Rinse tanks<br>Acid and rinse tanks with open grating to capture and hold any spills. |                         |                                                                                     |                                             |
|                                                                                                                             |                         | File: plymouth_008.JPG                                                              |                                             |

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| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.:</b> 9                                                                                       | <b>Time:</b><br>2:14 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> North                                                                       |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Holding/floc/mix tanks for pH monitoring and adjustment.                     |                         |                                                                                     |                                             |
|                                                                                                           |                         | File: plymouth_009.JPG                                                              |                                             |

|                                                                                                           |                         |                                                                                     |                                             |
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| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996 |                         | <b>Photographer:</b><br>Newton Ellens                                               | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.: 10</b>                                                                                      | <b>Time:</b><br>2:12 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> North                                                                       |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Holding/floc/mix tanks for pH monitoring and adjustment.                     |                         |                                                                                     |                                             |
|                                                                                                           |                         | File: plymouth_010.JPG                                                              |                                             |

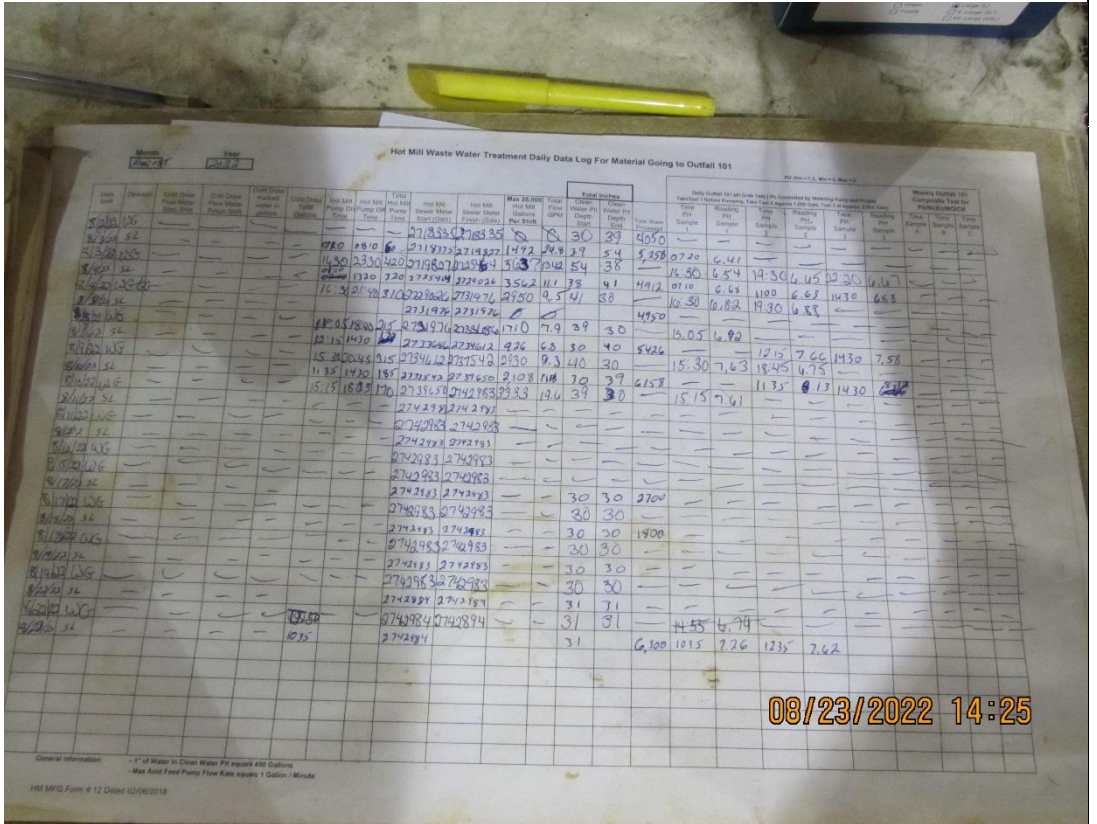
|                                                                                                           |                         |                                                                                     |                                             |
|-----------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------|---------------------------------------------|
| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996 |                         | <b>Photographer:</b><br>Newton Ellens                                               | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.:</b> 11                                                                                      | <b>Time:</b><br>2:18 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b>                                                                             |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Monitoring screen for reaction and mix tanks and pH monitoring.              |                         |                                                                                     |                                             |
| <b>File:</b> plymouth_011.JPG                                                                             |                         |                                                                                     |                                             |

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| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.: 12</b>                                                                                      | <b>Time:</b><br>2:22 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b>                                                                             |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Connection to monitoring equipment.                                          |                         |                                                                                     |                                             |
|                                                                                                           |                         | File: plymouth_012.JPG                                                              |                                             |

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| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.:</b> 13                                                                                      | <b>Time:</b><br>2:22 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b>                                                                             |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>pH monitoring screen.                                                        |                         |                                                                                     |                                             |
|                                                                                                           |                         | <b>File:</b> plymouth_013.JPG                                                       |                                             |

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| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |                                       |                                             |
| <b>Photo No.: 14</b>                                                                                      | <b>Time:</b><br>2:25 PM |                                       |                                             |
| <b>Direction Photo Taken:</b>                                                                             |                         |                                       |                                             |
| <b>Photo Description:</b><br>Daily pH monitoring sheet/record.                                            |                         |                                       |                                             |

File: plymouth\_014.JPG

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| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                      |  |                                             |
| <b>Photo No.:</b> 15                                                                                      | <b>Time:</b> 2:25 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b>                                                                             |                      |                                                                                     |                                             |
| <b>Photo Description:</b><br>Monthly city monitoring sheet.                                               |                      |                                                                                     |                                             |

File: plymouth\_015.JPG

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| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                      |  |                                             |
| <b>Photo No.:</b> 16                                                                                      | <b>Time:</b> 2:32 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b>                                                                             |                      |                                                                                     |                                             |
| <b>Photo Description:</b><br>Flow meter for water connection to City                                      |                      |                                                                                     |                                             |
|                                                                                                           |                      | File: plymouth_016.JPG                                                              |                                             |

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| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                      |  |                                             |
| <b>Photo No.:</b> 17                                                                                      | <b>Time:</b> 2:36 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> North                                                                       |                      |                                                                                     |                                             |
| <b>Photo Description:</b><br>Stormwater outfall 001 located on the North end of Facility.                 |                      |                                                                                     |                                             |
|                                                                                                           |                      | File: plymouth_017.JPG                                                              |                                             |

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| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.: 18</b>                                                                                      | <b>Time:</b><br>2:45 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b>                                                                             |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Culvert/sampling location for Outfall 001.                                   |                         |                                                                                     |                                             |
|                                                                                                           |                         | File: plymouth_018.JPG                                                              |                                             |

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**8/23/2022**

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|-----------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------|---------------------------------------------|
| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996 |                         | <b>Photographer:</b><br>Newton Ellens                                               | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.:</b> 19                                                                                      | <b>Time:</b><br>3:00 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> East                                                                        |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Rinse tanks with secondary containment underneath.                           |                         |                                                                                     |                                             |
|                                                                                                           |                         | File: plymouth_019.JPG                                                              |                                             |

**Plymouth Tube Co.****Inspection Date(s):****8/23/2022**

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|-----------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------|---------------------------------------------|
| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996 |                         | <b>Photographer:</b><br>Newton Ellens                                               | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.: 20</b>                                                                                      | <b>Time:</b><br>3:04 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> South                                                                       |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Rinse and acid tanks with secondary containment underneath.                  |                         |                                                                                     |                                             |
|                                                                                                           |                         | File: plymouth_020.JPG                                                              |                                             |

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|-----------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------|---------------------------------------------|
| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996 |                         | <b>Photographer:</b><br>Newton Ellens                                               | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  |                                             |
| <b>Photo No.:</b> 21                                                                                      | <b>Time:</b><br>3:05 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b> South                                                                       |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Rinse and acid tanks with secondary containment underneath.                  |                         |                                                                                     |                                             |
|                                                                                                           |                         | File: plymouth_021.JPG                                                              |                                             |

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|------------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------|---------------------------------------------|
| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996  |                         | <b>Photographer:</b><br>Newton Ellens                                               | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                             |                         |  |                                             |
| <b>Photo No.:</b> 22                                                                                       | <b>Time:</b><br>3:05 PM |                                                                                     |                                             |
| <b>Direction Photo Taken:</b>                                                                              |                         |                                                                                     |                                             |
| <b>Photo Description:</b><br>Cold water rinse tank and cleaner tank with secondary containment underneath. |                         |                                                                                     |                                             |
|                                                                                                            |                         | File: plymouth_022.JPG                                                              |                                             |

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|-----------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| <b>Facility Name &amp; Location:</b><br><br>Plymouth Tube Co.<br>572 W State Road 14<br>Winamac, IN 46996 |                         | <b>Photographer:</b><br>Newton Ellens                                                                       | <b>Camera:</b> Canon<br>Power Shot SX230 HS |
| <b>Date Photograph Was Taken:</b><br>8/23/2022                                                            |                         |  <p>08/23/2022 15:08</p> |                                             |
| <b>Photo No.:</b> 23                                                                                      | <b>Time:</b><br>3:08 PM |                                                                                                             |                                             |
| <b>Direction Photo Taken:</b> North                                                                       |                         |                                                                                                             |                                             |
| <b>Photo Description:</b><br>Empty container and waste storage area.                                      |                         |                                                                                                             |                                             |
|                                                                                                           |                         | File: plymouth_023.JPG                                                                                      |                                             |