

INSPECTION REPORT

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

Lead Inspector:			
Matthew Schulte			
	Region 5	schulte.matthew@epa.gov	(312) 886-2405
Additional Persons Participating in Inspection:			
Newton Ellens	Region 5	hodaj.andi@epa.gov	312-353-4645
Supervisor Review:			
Molly Smith	MOLLY SMITH	Digitally signed by MOLLY SMITH Date: 2022.10.25 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.

Unique Identifying No.	Observation	Area of Concern?
MS5-OB-001	Calibrations for daily pH readings are not recorded.	Yes
MS5-OB-002	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
MS5-OB-003	Secondary containment is present for all acid and rinse tanks on-site.	No
MS5-OB-004	Stormwater samples are taken at a culvert located within the plant upstream from Outfall 001.	Yes
MS5-OB-005	Facility has experienced past zinc exceedances	Yes
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.	Yes
MS5-OB-007	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. 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. 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. 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. 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)]

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

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Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996		Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
Date Photograph Was Taken: 8/23/2022			
Photo No.: 2	Time: 1:50 PM		
Direction Photo Taken:			
Photo Description: Scale Pit.			
		File: plymouth_002.JPG	

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8/23/2022

Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken:
8/23/2022

Photo No.: 3

Time:
1:51 PM

Direction Photo Taken: South

Photo Description:
Scale Hopper hauled every 6 weeks.



File: plymouth_003.JPG

Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken:
8/23/2022

Photo No.: 4	Time: 1:54 PM
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Direction Photo Taken: East

Photo Description:
Cooling tower automatic refuel station.



File: plymouth_004.JPG

Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken:
8/23/2022

Photo No.: 5

Time:
1:56 PM

Direction Photo Taken: South

Photo Description:
Lift station on the north side of Facility to sanitary.



File: plymouth_005.JPG

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Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken:
8/23/2022

Photo No.: 6	Time: 1:56 PM
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Direction Photo Taken: North

Photo Description:
Diesel Station with secondary containment.



File: plymouth_006.JPG

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Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken:
8/23/2022

Photo No.: 7	Time: 2:06 PM
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Direction Photo Taken: South

Photo Description:
Acid and rinse tanks with open grating to capture and hold any spills.



File: plymouth_007.JPG

Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken:
8/23/2022

Photo No.: 8	Time: 2:06 PM
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Direction Photo Taken: South

Photo Description:
Acid and Rinse tanks
Acid and rinse tanks with open grating to capture and hold any spills.



File: plymouth_008.JPG

Plymouth Tube Co.

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8/23/2022

Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken:
8/23/2022

Photo No.: 9	Time: 2:14 PM
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Direction Photo Taken: North

Photo Description:
Holding/floc/mix tanks for pH monitoring and adjustment.



File: plymouth_009.JPG

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

Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken:
 8/23/2022


Photo No.: 11	Time: 2:18 PM
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Direction Photo Taken:

Photo Description:
 Monitoring screen for reaction and mix tanks and pH monitoring.



File: plymouth_011.JPG

Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996		Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
Date Photograph Was Taken: 8/23/2022			
Photo No.: 12	Time: 2:22 PM		
Direction Photo Taken:			
Photo Description: Connection to monitoring equipment.			
		File: plymouth_012.JPG	

Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken: 8/23/2022
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Photo No.: 13	Time: 2:22 PM
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Direction Photo Taken:

Photo Description: pH monitoring screen.
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File: plymouth_013.JPG

Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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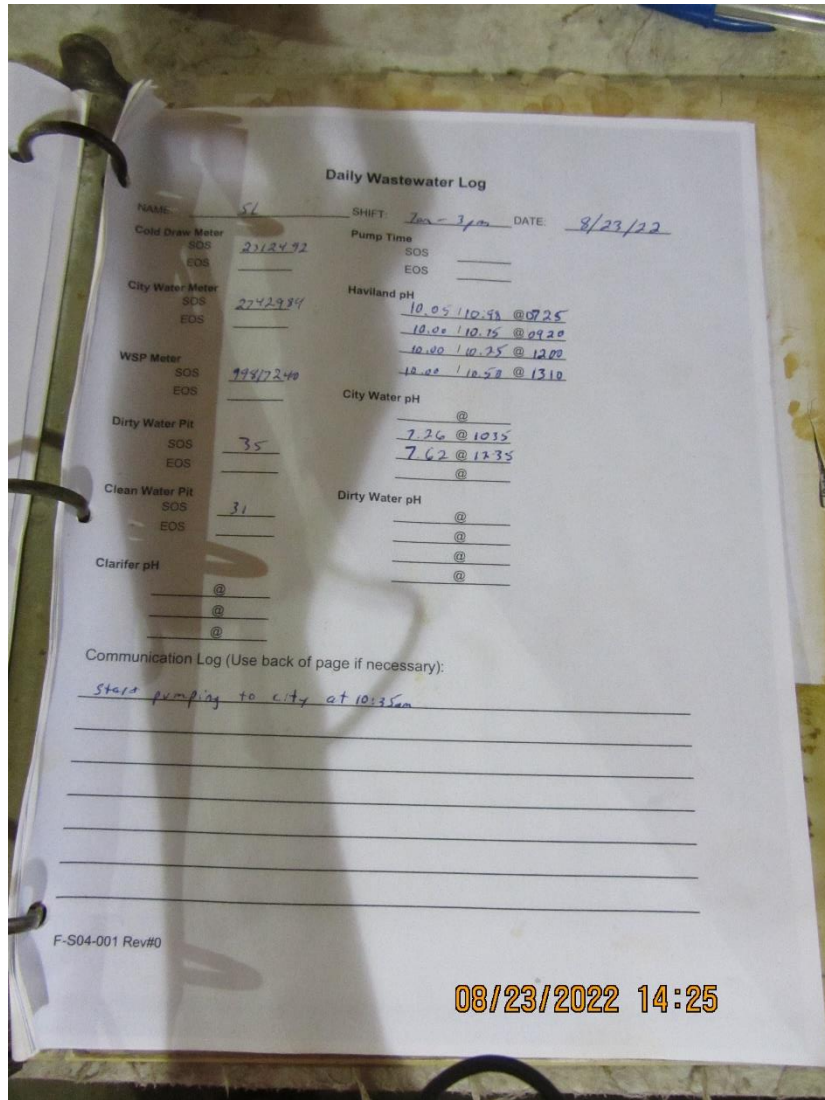
Date Photograph Was Taken:
 8/23/2022

Photo No.: 14

Time:
 2:25 PM

Direction Photo Taken:

Photo Description:
 Daily pH monitoring sheet/record.



File: plymouth_014.JPG

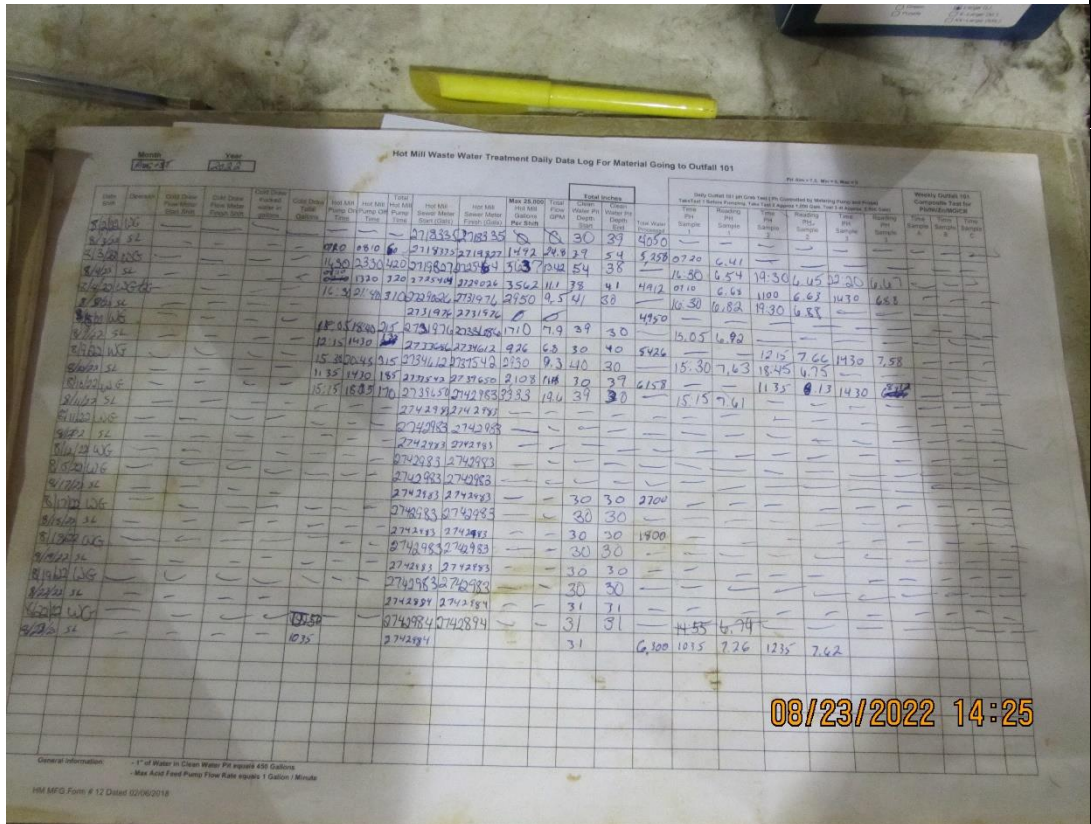
Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken:
 8/23/2022

Photo No.: 15 **Time:**
 2:25 PM

Direction Photo Taken:

Photo Description:
 Monthly city monitoring sheet.



File: plymouth_015.JPG

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Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996		Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
Date Photograph Was Taken: 8/23/2022			
Photo No.: 16	Time: 2:32 PM		
Direction Photo Taken:			
Photo Description: Flow meter for water connection to City			
		File: plymouth_016.JPG	

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Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken:
8/23/2022

Photo No.: 17	Time: 2:36 PM
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Direction Photo Taken: North

Photo Description:
Stormwater outfall 001 located on the North end of Facility.



File: plymouth_017.JPG

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Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996		Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
Date Photograph Was Taken: 8/23/2022			
Photo No.: 18	Time: 2:45 PM		
Direction Photo Taken:			
Photo Description: Culvert/sampling location for Outfall 001.			
		File: plymouth_018.JPG	

Facility Name & Location: Plymouth Tube Co. 572 W State Road 14 Winamac, IN 46996	Photographer: Newton Ellens	Camera: Canon Power Shot SX230 HS
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Date Photograph Was Taken:
8/23/2022

Photo No.: 19

Time:
3:00 PM

Direction Photo Taken: East

Photo Description:
Rinse tanks with secondary containment underneath.





File: plymouth_019.JPG

Plymouth Tube Co.

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

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

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

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