

January 29, 2003

Mr. Grant Bauserman  
International Aerospace Tubes, LLC  
4760 Kentucky Avenue  
Indianapolis, Indiana 46221

Re: 097-14691-00013  
Notice-only change to  
097-12857-00013

Dear Mr. Bauserman:

International Aerospace Tubes, LLC was issued a permit on December 4, 2000, for the stationary manufacturer of repair steel tubing and fabricated pipes for the aerospace industry. A letter notifying the Office of Air Quality of changes to existing emission units, stacks/vents, and addition of equipment was received on August 1, 2001. Pursuant to the provisions of 326 IAC 2-5.5-6, the registration is hereby revised as follows:

1. Descriptions:
  - (b) Two (2) Acid Cleaning Lines, identified as EU5 and EU6, consisting of several tanks, each with a maximum capacity of 300 gallons, ~~using no control equipment~~ **controlled with a model MW-300-8-3-SC air scrubber (installed 2001)**. EU5 ~~vents to V1~~ and EU6 ~~vents to V2~~ **vent to S4**. These tanks will use Nitric Acid (no more than 45% by volume), potassium permanganate, Vitroklene (sodium hydroxide), and rinse water to clean titanium and stainless steel parts
  - (c) Three (3) Wash Lines, identified as EU7, EU8, and EU9, consisting of several tanks, most tanks having a capacity of 350 gallons, using no control equipment. ~~EU7 vents to V-3, EU8 vents to V-4, and EU9 vents to V-5~~. These tanks will use mineral spirits, Vitroklene (sodium hydroxide), Jettacin, and rinse water to remove heavy oil from metal parts. **A closed-loop carbon adsorption system (installed in 2001) controls air emissions from the mineral spirits tanks in the wash line EU7. A closed-loop carbon adsorption system (installed in 2001) controls air emissions from the mineral spirits tanks in the wash line EU8. The adsorption systems use Carbtrol Vapor Phase Canisters.**
  - (f) ~~Silicon Dioxide~~ **Carbide** Blast Cabinet, identified as EU12, with a maximum capacity of 109 lbs/hr, using DC6 as control equipment, and venting inside the building.
2. The following equipment additions are being made at the source:
  - (r) **One (1) Aluminum Oxide Blast Cabinet, identified as EU14, with particulate control (PM and PM10), with capacity of 507 lbs./hr (installed in 2001).**
  - (s) **Two (2) Silicon Carbide Blast Cabinets, identified as EU13, with particulate control (PM and PM10), each with capacity of 109 lbs./hr (installed in 2001).**
  - (t) **One (1) wash rack (installed 2001), wash line located in the Bazooka Tube Cell. Truco 9045-6 and Jettacin cleaner to be used.**
  - (u) **One (1) wash rack (installed 2001), wash line located in 50J Tube Cell. Jettacin cleaner to be used.**
  - (v) **One (1) Entone Ultrasonic 30 gallon cleaning unit (installed 2001) that uses Enprep 576E sodium hydroxide cleaner.**
  - (w) **One (1) Small Drum Mounted Parts (30 gallon capacity) Washing Unit (installed 2001) that uses 20 gallons or less of solvent cleaner annually.**

- (x) **One (1) Cerrobend Tube Bender (installed 2001), a table top unit used to melt Cerrobend 5000-7 Low Melt Alloy metal. The metal is poured into the tube, which can then be bent without being deformed. Cerrobend 5000-7 contains Bismuth, Lead, Tin, and Cadmium.**
- (y) **One (1) unit for brush applying nickel and silver, protective plating material. There are no products containing volatile organic compounds of significance used in the process. In the brush plating process, the operator soaks the plating tool in the plating solution and the plating solution is delivered to the work area by an absorbent cover wrapped around the anode of the plating tool. The tool is brushed against the work area while a source of direct current is connected to the plating tool and the part being plated.**

Based on the data submitted and the provisions in 326 2-1.1-3, it has been determined that equipment additions to the stationary manufacturer of repair steel tubing and fabricated pipes for the aerospace industry located at 4760 Kentucky Avenue, Indianapolis, Indiana 46221 are classified as exempt from air pollution permit requirements. Pursuant to 326 IAC 2-1.1-3(e)(1), new sources or modifications to existing sources that are proposed to be operated or constructed, that have the potential to emit less than five (5) tons per year of either particulate matter (PM) or particulate matter with an aerodynamic diameter less than ten (10) micrometers (PM10) are exempt from the registration and permitting requirements of 326 IAC 2. Therefore, the one (1) aluminum oxide blast cabinet constructed in 2001 and the two (2) silicon carbide blast cabinets constructed in 2001 are exempt from the registration and permitting requirements of 326 IAC 2.

Pursuant to 326 IAC 2-1.1-3(e)(10)(D), cleaners and solvents characterized as having a vapor pressure equal to or less than two (2) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit) are exempt from the registration and permitting requirements of 326 IAC 2. Therefore, the one (1) wash rack (installed 2001) with wash line located in the Bazooka Tube Cell, and using Truco 9045-6 and Jettacin cleaner, and the one (1) wash rack (installed 2001) with wash line located in 50J Tube Cell using Jettacin cleaner are exempt from the registration and permitting requirements of 326 IAC 2. These wash racks do not use mineral spirits.

Pursuant to 326 IAC 2-1.1-3(e)(10)(C), degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months except if subject to 326 IAC 20-6 are exempt from the registration and permitting requirements of 326 IAC 2. Therefore, the small drum mounted parts washing unit installed in 2001 is exempt from the registration and permitting requirements of 326 IAC 2.

Pursuant to 326 IAC 2-1.1-3(e)(1)(G), new sources or modifications to existing sources that are proposed to be operated or constructed, that have the potential to emit less than two-tenths (0.2) ton per year of lead (Pb) are exempt from the registration and permitting requirements of 326 IAC 2. Therefore, the cerrobend tube bender installed in 2001 is exempt from the registration and permitting requirements of 326 IAC 2.

Pursuant to 326 IAC 2-1.1-3(e)(1)(E), new sources or modifications to existing sources that are proposed to be operated or constructed, that have the potential to emit less than five (5) tons per year of volatile organic compounds (VOC) for sources or modifications that require the use of air pollution control equipment to comply with the applicable provisions of 326 IAC 8 are exempt from the registration and permitting requirements of 326 IAC 2. Therefore, the brush plater installed in 2001 is exempt from the registration and permitting requirements of 326 IAC 2.

International Aerospace Tubes, LLC  
Indianapolis, Indiana  
Reviewer: Angelique Oliger

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All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

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 Angelique Oliger, (317) 327-2846.

Sincerely,

John B. Chavez  
Administrator  
Office of Environmental Services

Attachment

aco

cc: File - Marion County  
Air Compliance, Matt Mosier  
IDEM, Mindy Hahn  
Permits, Angelique Oliger

January 29, 2003

Grant Bauserman  
International Aerospace Tubes, LLC  
4760 Kentucky Avenue  
Indianapolis, Indiana 46221

Re: Registered Construction and Operation Status,  
097-12857-00013

Dear Mr. Bauserman:

The application from International Aerospace Tubes, received on 10/18/00, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following stationary manufacturer of repair steel tubing and fabricated pipes for the aerospace industry, is classified as registered:

- (a) Four (4) Plasma Spray Booths, identified as EU1, EU2, EU3, and EU4, with a combined maximum capacity to use approximately 3.9 tons of powder per year. EU1 uses DC1 as control equipment, EU2 and EU3 use DC2 as control equipment, and EU4 uses DC3 as control equipment. EU1 exhausts to S-1, EU2 and EU3 exhaust to S2, and EU3 exhausts to S3
- (b) Two (2) Acid Cleaning Lines, identified as EU5 and EU6, consisting of several tanks, each with a maximum capacity of 300 gallons, controlled with a model MW-300-8-3-SC air scrubber (installed 2001). EU5 and EU6 vent to V-4. These tanks will use Nitric Acid (no more than 45% by volume), potassium permanganate, Vitroklene (sodium hydroxide), and rinse water to clean titanium and stainless steel parts. A closed-loop carbon adsorption system (installed in 2001) controls air emissions from the mineral spirits tanks in the wash line EU7. A closed-loop carbon adsorption system (installed in 2001) controls air emissions from the mineral spirits tanks in the wash line EU8. The adsorption systems use Carbrol Vapor Phase Canisters.
- (c) Three (3) Wash Lines, identified as EU7, EU8, and EU9, consisting of several tanks, most tanks having a capacity of 350 gallons, using no control equipment. EU9 vents to V-5. These tanks will use mineral spirits, Vitroklene (sodium hydroxide), Jettacin, and rinse water to remove heavy oil from metal parts
- (d) Glass Bead Blast Cabinet, identified as EU10, with a maximum capacity of 109 lbs/hr, using DC4 as control equipment, and venting inside the building.
- (e) Glass Bead Blast Cabinet, identified as EU11, with a maximum capacity of 420 lbs/hr, using DC5 as control equipment, and venting inside the building
- (f) Silicon Carbide Blast Cabinet, identified as EU12, with a maximum capacity of 109 lbs/hr, using DC6 as control equipment, and venting inside the building
- (g) Silicon Carbide Blast Cabinet, identified as EU13, with a maximum capacity of 109 lbs/hr, using DC7 as control equipment, and venting inside the building
- (h) Aluminum Oxide Blast Cabinet, identified as EU14, with a maximum capacity of 507 lbs/hr, using DC5 as control equipment, and venting inside the building
- (i) Nineteen (19) gas fired combustion units, identified as EU15, with a combined capacity of

- 4,601,194.5 Btu/hr (4.6 mmBtu/hr), using no controls and venting inside the building
- (j) Small drum mounted parts washing machine with a capacity of 30 gallons, with no controls and venting inside the building
  - (k) Various welding operations, including semi-automatic TIG welders, TIG line welders, and TIG welding stations. Annual maximum capacity will be approximately 75 pounds of wire consumed
  - (l) Various electric heat treating furnaces and drying ovens
  - (m) Alloying process which involves the use of a syringe type device that places a small bead of brazing compound onto small metal parts. These parts are then placed in electric heat treating furnaces to complete the alloying process.
  - (n) Alodine treatment process which applies a protective chromate conversion on aluminum parts
  - (o) Anti gall coatings applied to the threads of end fittings
  - (p) Acetone cleaning used in various hand wiping applications at the facility.
  - (q) Non destructive testing of parts for cracks and other defects
  - (r) One (1) Aluminum Oxide Blast Cabinet, identified as EU14, with particulate control (PM and PM10), with capacity of 507 lbs./hr (installed in 2001).
  - (s) Two (2) Silicon Carbide Blast Cabinets, identified as EU13, with particulate control (PM and PM10), each with capacity of 109 lbs./hr (installed in 2001).
  - (t) One (1) wash rack (installed 2001), wash line located in the Bazooka Tube Cell. Trucon 9045-6 and Jettacin cleaner to be used.
  - (u) One (1) wash rack (installed 2001), wash line located in 50J Tube Cell. Jettacin cleaner to be used.
  - (v) One (1) Entone Ultrasonic 30 gallon cleaning unit (installed 2001) that uses Enprep 576E sodium hydroxide cleaner.
  - (w) One (1) Small Drum Mounted Parts (30 gallon capacity) Washing Unit (installed 2001) that uses 20 gallons or less of solvent cleaner annually.
  - (x) One (1) Cerrobend Tube Bender (installed 2001), a table top unit used to melt Cerrobend 5000-7 Low Melt Alloy metal. The metal is poured into the tube, which can then be bent without being deformed. Cerrobend 5000-7 contains Bismuth, Lead, Tin, and Cadmium.
  - (y) One (1) unit for brush applying nickel and silver, protective plating material. There are no products containing volatile organic compounds of significance used in the process. In the brush plating process, the operator soaks the plating tool in the plating solution and the plating solution is delivered to the work area by an absorbent cover wrapped around the anode of the plating tool. The tool is brushed against the work area while a source of direct current is connected to the plating tool and the part being plated.

The following conditions shall be applicable:

Pursuant to IAPCB Regulation 2 (Permits) and 326 IAC 2-5.5-4 (Registration Content) An authorized individual shall provide an annual notice to the Environmental Resources Management Division and the Office of Air Management that the source is in operation and in compliance with this registration pursuant to state regulation 326 IAC 2-5.5-4(a)(3).

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (30%) 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 15 minutes (60 readings) in a 6-hour period 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.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of a cold cleaner degreaser facility shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (1) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (2) The solvent is agitated; or
  - (3) The solvent is heated.
- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into

the cleaning system.

- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (2) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

- (a) Close the cover whenever articles are not being handled in the degreaser.
- (b) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (c) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### 326 IAC 6-3-2 (Process Operations)

Interpolation of the data for all PM emitting units (EU1, EU2, EU3, EU4, EU10, EU11, EU12, EU13, and EU14) shall be accomplished by use of the equation for the process weight rate up to sixty thousand (60,000) pounds per hour:

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

PM emissions shall not exceed 0.5837 pounds per hour for EU10, and filter baghouse DC4 shall be in operation any time that EU10 is in operation in order to comply with this limit. PM emissions shall not exceed 1.441 pounds per hour for EU11, and filter baghouse DC5 shall be in operation any time that EU11 is in operation in order to comply with this limit. PM emissions shall not exceed 0.5837 pounds per hour for EU12, and filter baghouse DC6 shall be in operation any time that EU12 is in operation in order to comply with this limit. PM emissions shall not exceed 0.5837 pounds per hour for EU13, and filter baghouse DC7 shall be in operation any time that EU13 is in operation in order to comply with this limit. PM emissions shall not exceed 1.6347 pounds per hour for EU14, and filter baghouse DC8 shall be in operation any time that EU14 is

in operation in order to comply with this limit. For detailed calculations, see appendix A page 11.

Pursuant to 326 IAC 1-2-59, process weight does not include liquid or gaseous fuels, therefore 326 IAC 6-3-2 does not apply to EU15.

**Compliance Data Section  
Office of Air Management  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, IN 46206-6015**

**and**

**Environmental Resources Management Division  
Air Quality Management Section, Compliance Data Group  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221-2097**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the City of Indianapolis Environmental Resources Management Division (ERMD) and Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by Mona A. Salem  
Mona A. Salem, Chief Operating Officer  
Department of Public Works  
City of Indianapolis

DRA

cc: file (2 copies)  
Mindy Hahn, IDEM



<b>Registration Annual Notification</b>
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This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3)

<b>Company Name:</b>	<b>International Aerospace Tubes, LLC</b>
<b>Address:</b>	<b>4760 Kentucky Avenue</b>
<b>City:</b>	<b>Indianapolis</b>
<b>Authorized individual:</b>	<b>General Manager</b>
<b>Phone #:</b>	<b>860-513-7620</b>
<b>Registration #:</b>	<b>097-12857-00013</b>

I hereby certify that International Aerospace Tubes, LLC is still in operation and is in compliance with the requirements of Registration 097-12857-00013.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>