

TO: Interested Parties / Applicant

RE: International Aerospace Tubes, LLC/ 097-20675-00013

FROM: Felicia A. Robinson  
Manager of Environmental Planning

## Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures

June 13, 2005

**Certified Mail: 7000 0600 0023 5188 5759**

Mr. Kevin Kirkpatrick  
International Aerospace Tubes, LLC  
4760 Kentucky Avenue  
Indianapolis, Indiana 46221

Re: 097-20675-00013  
Notice-only change to  
R 097-12857-00013

Dear Mr. Kirkpatrick:

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. Further, a Notice Only Change, 097-14691 -00013 was also issued on January 29, 2003. A letter notifying the Indianapolis Office of Environmental Services (OES) of changes to Authorized Individual, existing emission units, stacks/vents, and addition of equipment was received on February 2, 2005. Pursuant to the provisions of 326 IAC 2-5.5-6, the registration is hereby revised as follows:

1. Administrative Changes:
  - (a) Mr. Kevin Kirkpatrick has replaced Mr. Grant Bauserman as the General Manager of the facility and the Authorized Individual.
  - (b) Opacity Condition is revised as follows:  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions **Alternative Opacity Limitations**), opacity shall meet the following:
    - (a) Opacity shall not exceed an average of ~~forty~~ **thirty** percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (c) Name change of blast cabinets as follows:
    - (r) One (1) Aluminum Oxide Blast Cabinet, identified as ~~EU14~~ **EU16**, 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~~ **EU 17 and EU 18**, with particulate control (PM and PM10), each with capacity of 109 lbs./hr (installed in 2001).
2. The following changes to existing emission units, stack/vents, or the addition of control equipment:
  - (a) the source informed that emission unit EU9, jettacin tank and vitroklene tank were decommissioned. It also plans to introduce Brulin 815GD for cleaning purposes in its Wash Lines instead of Jettacin cleaner. Due to the changes, the corresponding description item (c) on page 1 of the Registration has been revised as follows:

- (c) ~~Three (3)~~ **Two (2)** Wash Lines, identified as EU7, **and** 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,~~ **Brulin 815GD** and rinse water to remove heavy oil from metal parts.
- (b) The source did not install and does not plan to install emission units EU2, EU3, EU4 and requested removal from the Registration. There will be no change in the permitting status of the source. The corresponding description item (a) on page 1 of the Registration has been revised as follows:
- (a) ~~Four (4)~~ **One (1)** 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 and** exhausts to **stack S-1** ~~EU2 and EU3 exhaust to S2, and EU3 exhausts to S3~~
- (c) Due to removal of Enthroner Ultrasonic tank at the source, the corresponding description item (v) on Page 2 of the Registration has been deleted, and renumbered the remaining units as follows:
- ~~(v)~~ ~~One (1) Entone Ultrasonic 30 gallon cleaning unit (installed 2001) that uses Enprep 576E sodium hydroxide cleaner.~~
- ~~(w)~~**(v)** One (1) Small Drum Mounted Parts (30 gallon capacity) Washing Unit (installed 2001) that uses 20 gallons or less of solvent cleaner annually.
- ~~(x)~~**(w)** 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)~~**(x)** 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.
- (d) The name changes in the description also required change in an applicable condition, hence the process operations condition is revised as follows:

Interpolation of the data for all PM emitting units (EU1, ~~EU2, EU3, EU4~~, EU10, EU11, EU12, EU13, ~~and~~ EU14, **EU16, EU 17, and EU 18**) 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, **EU 17, and EU 18** and filter baghouse DC7 shall be in operation any time that EU13, **EU 17, and EU 18** ~~is are~~ in operation in order to comply with this limit. PM emissions shall not exceed 1.6347 pounds per hour for EU14 **and EU16**, and filter baghouse DC8 shall be in operation any time that EU14 **and EU16** ~~is are~~ in operation in order to comply with this limit. For detailed calculations, see appendix A page 11.

All references to the Office of Air Management (OAM) and Environmental Resources Management Division (ERMD) have been changed to Office of Air Quality (OAQ) and Office of Environmental Services (OES).

All other conditions of the permit shall remain unchanged and in effect. Enclosed is the revised registration.

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 Keshav Reddy, (317) 327-2176.

Sincerely,

Original Signed by

Felicia A. Robinson  
Manager of Environmental Planning

Attachment

FR/kr

cc: File - Marion County Health Department  
Air Compliance, Matt Mosier  
IDEM, Mindy Hahn

June 13, 2005

Mr. Kevin Kirkpatrick  
International Aerospace Tubes, LLC  
4760 Kentucky Avenue  
Indianapolis, Indiana 46221

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

Dear Mr. Kirkpatrick:

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) One (1) Plasma Spray Booth, identified as EU1, with a maximum capacity to use approximately 3.9 tons of powder per year. EU1 uses DC1 as control equipment, and exhausts to stack S-1.
- (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 Carbtrol Vapor Phase Canisters.
- (c) Two (2) Wash Lines, identified as EU7 and EU8, consisting of several tanks, most tanks having a capacity of 350 gallons, using no control equipment. These tanks will use mineral spirits, Brulin 815GD, 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 EU16, with particulate control (PM and PM10), with capacity of 507 lbs./hr (installed in 2001).
- (s) Two (2) Silicon Carbide Blast Cabinets, identified as EU17 and EU 18, 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) Small Drum Mounted Parts (30 gallon capacity) Washing Unit (installed 2001) that uses 20 gallons or less of solvent cleaner annually.
- (w) 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.
- (x) 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 Indianapolis Office of Environmental Services and the Indiana Department of Environmental Management, Office of Air Quality 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 thirty 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 (Particulate Emission Limitations)

Interpolation of the data for all PM emitting units (EU1, EU10, EU11, EU12, EU13, EU14, EU16, EU 17, and EU 18) 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, EU 17, and EU 18 and filter baghouse DC7 shall be in operation any time that EU13, EU17, and EU18 are in operation in order to comply with this limit. PM emissions shall not exceed 1.6347 pounds per hour for EU14 and EU16, and filter baghouse DC8 shall be in operation any time that EU14 and EU16 are 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 Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46204**

**and**

**Office of Environmental Services  
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 OES and OAQ if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by

Felicia A. Robinson  
Manager of Environmental Planning

DRA

cc: file (2 copies)  
Mindy Hahn, IDEM

|   |
|---|
| <b>Registration<br/>Annual Notification</b> |
|---|

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>         |