February 13, 2006

City of Indianapolis DPW Department of Public Works
Bart Peterson, Mayor

Certified Mail: 7000 0600 0023 5187 2070

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

Re: 097-21898-00013
Third Notice only Change to
Registration No.:
097-12857-00013

Dear Mr. Kirkpatrick:

International Aerospace Tubes, LLC. was issued Registration 097-12857-00013 on December 4, 2000 for the stationary manufacturer of repair steel tubing and fabricated pipes for the aerospace industry. A letter requesting the removal of several permitted activities as well as language revisions was received on October 11, 2005. Changes have also been made to the mailing address. Therefore, pursuant to 326 IAC 2-5.5-6(d)(2), the Registration is hereby amended as follows: (the bold language is new language that has been added, and the language with a line through it has been taken out).

1. The following corrections have been made to the Registration pursuant to 326 IAC 2-5.5-6(d)(2):

(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) **One (1)** ~~Two (2)~~ Wash Line~~s~~, 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. **A closed-loop carbon adsorption system (installed in 2001) controls air emissions from the mineral spirits tanks in the wash line EU7. The adsorption systems use Carbtrol Vapor Phase Canisters.**

~~(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~~

~~(j) Small drum mounted parts washing machine with a capacity of 30 gallons, with no controls and venting inside the building~~

~~(n) Alodine treatment process which applies a protective chromate conversion on aluminum parts~~

~~(t) One (1) wash rack (installed 2001), wash line located in the Bazooka Tube Cell. Truco 9045-6 and Jettacin cleaner to be used.~~

326 IAC 6-3-2 (Particulate Emission Limitations)
Interpolation of the data for all PM emitting units (EU1, EU10, ~~EU 11,~~ EU12, EU13, EU14, EU16, EU 17, and EU 18) ….

2. The following item was incorrectly identified in the original permit. The wash rack, wash line was installed in June of 2005 in the OEM Cell. This particular wash rack, wash line utilizes 815 GD in it's process which contains no VOC's or HAP's. Therefore, the following activity is being removed from the permit.

   ~~(u) One (1) wash rack (installed 2001), wash line located in 50J Tube Cell. Jettacin cleaner to be used~~

3. Change to IDEM, OAQ address is acknowledged and incorporated into the permit as follows:

   Indiana Department of Environmental Management
   Compliance Branch, Office of Air Quality
   100 North Senate Avenue
   Indianapolis, IN 46204**-2251**

All other conditions of the Registration shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original 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 TJ Edwards at (317) 327-2283.

Sincerely,

Original Signed by

Felicia A. Robinson
Manager of Environmental Planning

Attachments: Revised Permit
FAR/tle

cc: OES, Air Permits-2
Air Compliance – Matt Mosier
IDEM, OAQ – Mindy Hahn
US EPA Region 5
Marion County Health Dept.

February 13, 2006

City of Indianapolis
DPW
Department of Public Works
Bart Peterson, Mayor

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

Re: 097-21898-00013 Third Notice Only Change to Registration
Construction and Operation Status
097-12857-00013

Dear Mr. Kirkpatrick:

The application from International Aerospace Tubes, received on October 11, 2005, has been reviewed. A First Notice Only Change (097-14691-00013) was issued on January 29, 2003 and a Second Notice Only Change (097-20675-00013) was issued on June 13, 2005. 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.

(c) One (1) Wash Line, identified as EU7, 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. A closed-loop carbon adsorption system (installed in 2001) controls air emissions from the mineral spirits tanks in the wash line EU7. The adsorption systems use Carbtrol Vapor Phase Canisters.

(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) 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

(f) 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

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

(g) 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

(h) 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

(i) 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

(j) Various electric heat treating furnaces and drying ovens

(k) 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.

(l) Anti gall coatings applied to the threads of end fittings

(m) Acetone cleaning used in various hand wiping applications at the facility.

(n) Non destructive testing of parts for cracks and other defects

(o) One (1) Aluminum Oxide Blast Cabinet, identified as EU16, with particulate control (PM and PM10), with capacity of 507 lbs./hr (installed in 2001).

(p) 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).

(q) One (1) Small Drum Mounted Parts (30 gallon capacity) Washing Unit (installed 2001) that uses 20 gallons or less of solvent cleaner annually.

(r) 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.

(s) 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), a 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 (sixty (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 continuos 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 ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(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 ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), 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 ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{O}C$) (one hundred twenty degrees Fahrenheit ($120^{O}F$)):

(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, 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:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = 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 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.

An authorized individual shall provide an annual notice to the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204-2251

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

FAR/tle

cc: file (2 copies)
Mindy Hahn, IDEM
Air Compliance - Matt Mosier
US EPA Region 5
Marion County Health Dept.

Registration
Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3)

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

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

Name (typed):
Title:
Signature:
Date: