



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

April 15, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: DePuy Orthopaedics, Inc. / MSM 085-18246-00048

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require 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 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 Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03

April 15, 2004

Mr. Steve Schroedl
DePuy Orthopaedics, Inc.
P.O. Box 988
Warsaw, Indiana

Re: 085-18246
Minor Source Modification to
Part 70 085-15832-00048

Dear Mr. Schroedl:

DePuy Orthopaedics, Inc., located at 700 Orthopaedics Drive, Warsaw, Indiana 45681 was issued a Part 70 permit on September 5, 2003 for a stationary plant that manufactures medical implants. A letter requesting a change to the Part 70 permit was received on November 17, 2003, which involves the installation of a surface coating booth. Although this modification's VOC PTE is below 10 tons per year, it is being performed pursuant to 326 IAC 2-7-10.5(d)(6), Minor Source Modification as the modification is subject to the National Emission Standard for Hazardous Pollutants (NESHAPs), Subpart M (Miscellaneous Metal Coating):

- (a) One (1) surface coating booth, identified as SB7, equipped with airless spray system with a maximum capacity of 0.125, using dry filters to control PM overspray emissions.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be

placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This minor source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

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 call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - Kosciusko County
U.S. EPA, Region V
Kosciusko County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

**DePuy Orthopaedics, Inc.
700 Orthopaedic Drive
Warsaw, Indiana 45681**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Minor Source Modification: 085-18246-00048	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: April 15, 2004

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) surface coating booth, identified as SB7, installed in 2003, equipped with airless spray system with a maximum capacity of 0.125 units per hour, using dry filters to control PM overspray emissions.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) Limit [326 IAC 8-2-9]

Paint Booth SB7 shall use less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents and cleaning solvents. This usage limit is required to limit this booth's potential to emit VOC to less than 15 pounds per day. Compliance with this limit renders the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.

D.4.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies), the surface coating operation at Paint Booth SB7 shall be controlled by a dry filter, waterwash, or an equivalent control device and shall be operated in accordance with manufacturer's specifications.

D.4.3 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous

D.4.4

Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and 3 years after the effective date of 40 CFR Part 63, Subpart M.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

- (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

Notification Requirements [40 CFR 63.3910]

D.4.6

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Mmmm.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.4.7 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart Mmmm, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart Mmmm.
- (c) The significant permit modification application shall be submitted to:

Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limit in Condition D.4.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount of coating material and solvent less water used on daily basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (2) The cleanup solvent usage for each day;
- (3) The total VOC usage for each day; and
- (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of the Part 70 permit.

D.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements of the Part 70 permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report Monthly Usage

Source Name: DePuy Orthopaedics, Inc.
Source Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Mailing Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Part 70 Permit No.: T085-15832-00048
Facilities: Paint Booth SB7
Parameter: VOC usage
Limit: Less than 15 pounds per day

Submit three monthly VOC usage for each quarter.

Month: _____ Year: _____

Day	VOC Usage (lbs/day)	Day	VOC Usage (lbs/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification and Significant Permit Modification

Source Background and Description

Source Name:	DePuy Orthopaedics, Inc.
Source Location:	700 Orthopaedic Drive, Warsaw, Indiana 45681
County:	Kosciusko
SIC Code:	3842
Operation Permit No.:	T 085-15832-00048
Operation Permit Issuance Date:	September 5, 2003
Minor Source Modification No.:	085-18246
Significant Permit Modification No.:	085-18499
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from DePuy Orthopaedics, Inc., which manufactures medical implants relating to the construction of the following emission units and pollution control devices:

- (a) One (1) surface coating booth, identified as SB7, equipped with airless spray system with a maximum capacity of 0.125, using dry filters to control PM overspray emissions.

History

On, November 19, 2003, DePuy Orthopaedics, Inc. submitted an application to the OAQ requesting to add additional surface coating lines to their existing plant. DePuy Orthopaedics, Inc. was issued a Part 70 permit on September 5, 2003. Originally, the source was operating under a Minor Source Operating Permit (MSOP) 085-13979-00048 issued on June 28, 2001, until the source was upgraded into a Part 70 source.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SB7	Surface Coating	38	18	2,000	70

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 17, 2003. Additional information was received on December 9, 2003.

Emission Calculations

- (a) Surface Coating Booth SB7: See page 1 and 2 TSD Appendix A for detailed calculations

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.29
PM-10	0.29
SO ₂	0.0
VOC	2.93
CO	0.0
NO _x	0.0

HAP's	Potential To Emit (tons/year)
Toluene	2.87
Methyl Methacrylate	0.01
Single HAP	2.87
Combined HAPs	2.88

Justification for Modification

- (a) The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. Although this modification’s VOC PTE is below 10 tons per year, it is being performed pursuant to 326 IAC 2-7-10.5(d)(6), as the modification is subject to the National Emission Standard for Hazardous Pollutants (NESHAPs), Subpart M (Miscellaneous Metal Coating); and
- (b) The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification, pursuant o 326 IAC 2-7-12(d), since it is a modification under Title I of the Clean Air Act, and significant change in the permit terms and conditions will result.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	not determined

PTE After Modification	21.60	21.60	0.05	22.86	57.28	29.15	17.35	17.50
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This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels of 250 tons/year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (a) New Source Performance Standards (NSPS):
 - (1) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)
 - (1) 326 IAC 14 and 40 CFR Part 63, Subpart M - Although the proposed paint booth that will be used in the coating of metal medical implants is not by itself major for HAP, it is subject to this NESHAP since it is located in a source that is major for hazardous air pollutants. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with the NESHAP requirements on and 3 years after the effective date of 40 CFR Part 63, Subpart M.
 - (2) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

- (a) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
 The Paint Booth SB7 is subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), as it has the potential to actually emit 15 pounds of VOC per day. The source requested that its VOC usage be limited to less than 15 pounds per day, in order to avoid the applicability of this rule.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)
 Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies), the surface coating operation at Paint Booth SB7 shall be controlled by a dry filter, waterwash, or an equivalent control device and shall be operated in accordance with manufacturer's specifications.

The Permittee is in compliance with this rule, as the PM overspray from Paint Booth SB7 will be controlled by dry filters.

Changes to the Part 70

The Part 70 will be modified to include the new Spray Booth SB7 in Section A.2 and to add the following Section D.4 in the permit (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
 [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Three (3) paint booths, identified as SB1, SB2 and SB3, installed in 1985, 1987, and 1987 respectively, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for

overspray control and exhausting to stacks E85, E86, and E87, respectively.

- (b) Three (3) paint booths, identified as SB4, SB5, and SB6, installed in 2002, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for overspray control and exhausting to stacks E105, E106 and E107, respectively.
- (c) One (1) polishing operation, consisting of 40 polishing jacks, installed between 1981 and 1998, each with a maximum throughput of 10 pieces per hour, using wet dust collectors 00222 and 00266 for PM control, and exhausting through stacks WDC1 and WDC2.
- (d) One (1) surface coating booth, identified as SB7, installed in 2003, equipped with airless spray system with a maximum capacity of 0.125 units per hour, using dry filters to control PM overspray emissions.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (d) One (1) surface coating booth, identified as SB7, installed in 2003, equipped with airless spray system with a maximum capacity of 0.125 units per hour, using dry filters to control PM overspray emissions.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) Limit [326 IAC 8-2-9]

Paint Booth SB7 shall use less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents and cleaning solvents. This usage limit is required to limit this booth's potential to emit VOC to less than 15 pounds per day. Compliance with this limit renders the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.

D.4.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies), the surface coating operation at Paint Booth SB7 shall be controlled by a dry filter, waterwash, or an equivalent control device and shall be operated in accordance with manufacturer's specifications.

D.4.3 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

National Emission Standards for Hazardous Air Pollutants for Surface Coating of

D.4.4

Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882]

[40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and 3 years after the effective date of 40 CFR Part 63, Subpart M.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
- (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.6 Notification Requirements [40 CFR 63.3910]

- (a) **General.** The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) **Initial notification.** The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart M.
- (c) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The

notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.4.7 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart M, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart M.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limit in Condition D.4.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount of coating material and solvent less water used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (2) The cleanup solvent usage for each day;
 - (3) The total VOC usage for each day; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of the Part 70 permit.

D.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1

shall be submitted to the address listed in Section C - General Reporting Requirements of the Part 70 permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report
 Monthly Usage**

Source Name: DePuy Orthopaedics, Inc.
Source Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Mailing Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Part 70 Permit No.: T085-15832-00048
Facilities: Paint Booth SB7
Parameter: VOC usage
Limit: Less than 15 pounds per day

Submit three monthly VOC usage for each quarter.

Month: _____ Year: _____

Day	VOC Usage (lbs/day)	Day	VOC Usage (lbs/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The construction of paint booth shall be subject to the conditions of the attached proposed Part 70 **Minor Source Modification No. 085-18246-00048 and Significant Permit Modification No.: 085-18499-00048.**

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: DePuy Orthopaedics
Address City IN Zip: 700 Orthopaedic Drive, Warsaw, Indiana 46581
MSM: 085-18246
Plt ID: 085-00048
Reviewer: Aida De Guzman
Date Application Received: Nov. 19, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Spray Booth SB7																
Toluene	7.2	100.00%	0.0%	100.0%	0.0%	0.00%	0.65000	0.125	7.20	7.20	0.59	14.04	2.56	0.00	#DIV/0!	45%
Paraloid	7.9	56.00%	0.0%	56.0%	0.0%	44.00%	0.15000	0.125	4.42	4.42	0.08	1.99	0.36	0.29	10.05	0%

State Potential Emissions

Add worst case coating to all solvents

0.67	16.03	2.93	0.29
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METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used