



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

September 24, 2004

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

TO: Interested Parties / Applicant

RE: Symmetry Medical Orthy, Inc / 085-19142-00059

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

### 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 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  
FN-REGIS.dot 9/16/03



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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Governor

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Commissioner

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Linda Scalet  
Symmetry Medical – Othy Division  
486 West 350 North  
Warsaw, Indiana 46580

September 24, 2004

Re: Registered Construction and Operation Status,  
085-19142-00059

Dear Ms. Scalet:

The application from Symmetry Medical – Othy Division received on May 7, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following emission units of a medical instrument manufacturing company, located at 486 West 350 North, Warsaw, Indiana 46580 (the North Street plant), and 2094 North Boeing Drive, Warsaw, Indiana 46582 (the Boeing Plant) are classified as registered:

The following emission units at the North Street Plant:

- (a) One (1) metal fabrication process, with a maximum throughput rate of 200 lbs/hr, consisting of the following:
- (1) Eight (8) grinders.
  - (2) Thirty-five (35) CNC lathes.
  - (3) Forty-seven (47) milling machines.
  - (4) Two (2) electrical discharge machines (EDMs).
  - (5) Cutting and grinding instruments.
  - (6) One (1) metal inert gas (MIG) welding station, with a maximum wire consumption rate of 0.05 lbs/hr, controlled by a Torit dust collector.
  - (7) Four (4) tungsten inert gas (TIG) stations, each with a maximum wire consumption rate less than 625 lbs/day.
  - (8) Two (2) oxyacetylene stations, each with a maximum cutting rate of less than 3,400 inches per hour of stock with one (1) inch thickness.
  - (9) Six (6) TIG stations, each with a maximum metal consumption of 2.43 lbs/hr.
  - (10) Six (6) CNC vertical machining centers.
  - (11) Four (4) DEM rams.

- (b) One (1) polishing process, including forty-two (42) polishing stations, identified as PJC-01 through PJC-42, with a total throughput rate of 200 lbs/hr, each controlled by a dust collector.
  
- (c) Nineteen (19) natural gas fired heaters, including the following:
  - (1) One (1) natural gas fired heater, identified as H-1, with a maximum heat input capacity of 0.8 MMBtu/hr.
  - (2) One (1) natural gas fired heater, identified as H-2, with a maximum heat input capacity of 0.17 MMBtu/hr.
  - (3) Two (2) natural gas fired heaters, identified as H-3 and H-4, each with a maximum heat input capacity of 0.1 MMBtu/hr.
  - (4) One (1) natural gas fired heater, identified as H-5, with a maximum heat input capacity of 0.08 MMBtu/hr.
  - (5) One (1) natural gas fired heater, identified as H-6, with a maximum heat input capacity of 0.15 MMBtu/hr.
  - (6) One (1) natural gas fired heater, identified as H-7, with a maximum heat input capacity of 0.154 MMBtu/hr.
  - (7) One (1) natural gas fired heater, identified as HVAC#1, with a maximum heat input capacity of 1.2 MMBtu/hr.
  - (8) One (1) natural gas fired heater, identified as HVAC#2, with a maximum heat input capacity of 0.6 MMBtu/hr.
  - (9) One (1) natural gas fired heater, identified as HVAC#3, with a maximum heat input capacity of 0.8 MMBtu/hr.
  - (10) One (1) natural gas fired heater, identified as HVAC#4, with a maximum heat input capacity of 1.5 MMBtu/hr.
  - (11) One (1) natural gas fired heater, identified as HVAC#5, with a maximum heat input capacity of 0.5 MMBtu/hr.
  - (12) One (1) natural gas fired heater, identified as HVAC#6, with a maximum heat input capacity of 0.6 MMBtu/hr.
  - (13) One (1) natural gas fired heater, identified as HVAC#7, with a maximum heat input capacity of 0.9 MMBtu/hr.
  - (14) Two (2) natural gas fired heaters, identified as HVAC#8 and HVAC#9, each with a maximum heat input capacity of 0.188 MMBtu/hr.
  - (15) Two (2) natural gas fired heaters, identified as HVAC#10 and HVAC#11, each with a maximum heat input capacity of 0.388 MMBtu/hr.
  - (16) One (1) natural gas fired heater, identified as ID48, with a maximum heat input capacity of 0.049 MMBtu/hr.

The following emission units at the Boeing Plant:

- (a) One (1) machining and milling process, constructed in 2004, with a maximum throughput rate of 181 lbs/hr, consisting of the following:
  - (1) One (1) CNC grinder.
  - (2) Four (4) CNC lathes.
  - (3) Four (4) CNC vertical machining centers.
  - (4) Three (3) electrical discharge machines (EDM) for wire.
  - (5) Four (4) laser cutters.
  - (6) Two (2) electric ovens.
  - (7) Six (6) standard lathes.
  - (8) Eleven (11) vertical mills.
  - (9) Four (4) surface grinders.
  - (10) Seven (7) hydraulic presses.
- (b) One (1) polishing process, constructed in 2004, with a maximum throughput rate of 172 lbs/hr, consisting of the following:
  - (1) Eight (8) polishing jacks, identified as D-1 through D-8, each controlled by a dust collector.
  - (2) Five (5) shot blasters, identified as SB-1 through SB-5, using glass beads as the blast media, each controlled by a dust collector.
- (c) Five (5) parts washers, identified as W1 through W5, constructed in 2004, each with a maximum solvent usage less than 145 gallons per 12 months, using non-halogenated solvents.
- (d) One (1) natural gas fired heater, identified as #3107, constructed in 2004, with a maximum heat input capacity of 0.4 MMBtu/hr.

The following conditions shall be applicable:

- 1. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of forty percent (40%) 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.

2. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), Particulate emissions from each of the following processes shall be limited to the pounds per hour limits listed in the table below:

Process	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
Metal Fabricating Process at North Street Plant	200	0.88
Polishing Process at North Street Plant	200	0.88
Machining and Milling Process at Boeing Plant	181	0.82
Polishing Process at Boeing Plant	172	0.79

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

3. Pursuant to 326 IAC 8-3-2 (Cold Cleaning Operations), the Permittee shall comply with the following operating requirements for the parts washers (W1 through W5), which will be constructed after January 1, 1980:
- (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; and
  - (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.
4. Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), the parts washers (W1 through W5) at this source, which will be constructed after July 1, 1990 and do not have remote solvent reservoirs, have the following requirements:
- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met:
    - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
      - (A) 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));

- (B) the solvent is agitated; or
  - (C) the solvent is heated.
- (2) 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.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (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)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5 (b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) 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.

This is the first registration issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

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

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 Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Ms. Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,  
Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

ERG/YC

cc: File – Kosciusko County  
Kosciusko County Health Department  
Northern Regional Office  
Air Compliance – Doyle Houser  
Permit Tracking  
Compliance Data Section

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

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	<b>Symmetry Medical - Othy Division</b>
<b>Address:</b>	<b>486 West 350 North</b>
<b>City:</b>	<b>Warsaw, Indiana 46580</b>
<b>Authorized individual:</b>	<b>Linda Scalet</b>
<b>Phone #:</b>	<b>(574) 267-8700</b>
<b>Registration #:</b>	<b>085-19142-00059</b>

I hereby certify that Symmetry Medical - Othy Division, is still in operation and is in compliance with the requirements of Registration No. 085-19142-00059.

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

Indiana Department of Environmental Management  
Office of Air Quality

**Technical Support Document (TSD) for a Registration**

**Source Background and Description**

Source Name: Symmetry Medical – Othy Division  
Initial Location: 486 West 350 North, Warsaw, Indiana 46580  
County: Kosciusko  
SIC Code: 3842  
Registration No.: 085-19142-00059  
Permit Reviewer: ERG/YC

The Office of Air Quality (OAQ) has reviewed an application from Symmetry Medical – Othy Division relating to the operation of an existing medical instrument manufacturing plant.

**History**

Symmetry Medical – Othy Division (formerly Othy, Inc.) submitted an application to IDEM, OAQ requested to add machining units to their existing source and to construct and operate a new similar plant nearby, referred to as the Boeing Plant.

Symmetry Medical – Othy Division is an existing medical instrument manufacturing plant that makes metal parts for replacement of body parts. The existing plant (referred to as the North Street Plant) is operating under Exemption #085-15794-00059, issued on September 23, 2002. The North Street Plant and Boeing Plant are considered to be a single source (see the section of “Source Definition” below). After this modification, the potential to emit from the entire source will be increased to registration levels. Therefore, a registration will be issued to this source to cover the operation of these two (2) plants.

**Source Definition**

This medical instrument manufacturing company consists of two (2) plants:

- (1) North Street Plant, an existing plant, located at 486 West 350 North, Warsaw, Indiana 46580, started operation in 1996 (SIC code: 3842); and
- (2) Boeing Plant, to be constructed in 2004, located at 2094 North Boeing Drive, Warsaw, Indiana 46582, started operation in 2004 (SIC code: 3842).

Since the two (2) plants have the same SIC codes, manufacture the same products, are owned by the same company, and are located 2.6 miles apart, IDEM, OAQ has determined that North Street Plant and Boeing Plant are considered a single source.

**Permitted Emission Units and Pollution Control Equipment**

The following emission units at North Street Plant:

- (a) One (1) metal fabrication process, with a maximum throughput rate of 200 lbs/hr, consisting of the following:

- (1) Eight (8) grinders.
  - (2) Thirty-two (32) CNC lathes.
  - (3) Forty-seven (47) milling machines.
  - (4) One (1) electrical discharge machines (EDM).
  - (5) Cutting and grinding instruments.
  - (6) One (1) metal inert gas (MIG) welding station, with a maximum wire consumption rate of 0.05 lbs/hr, controlled by a Torit dust collector.
  - (7) Four (4) tungsten inert gas (TIG) stations, each with a maximum wire consumption rate less than 625 lbs/day.
  - (8) Two (2) oxyacetylene stations, each with a maximum cutting rate of less than 3,400 inches per hour of stock with one (1) inch thickness.
  - (9) Six (6) TIG stations, each with a maximum metal consumption of 2.43 lbs/hr.
- (b) One (1) polishing process, including forty-two (42) polishing stations, identified as PJC-01 through PJC-42, with a total throughput rate of 200 lbs/hr, each controlled by a dust collector.
- (c) Nineteen (19) natural gas fired heaters, including the following:
- (1) One (1) natural gas fired heater, identified as H-1, with a maximum heat input capacity of 0.8 MMBtu/hr.
  - (2) One (1) natural gas fired heater, identified as H-2, with a maximum heat input capacity of 0.17 MMBtu/hr.
  - (3) Two (2) natural gas fired heaters, identified as H-3 and H-4, each with a maximum heat input capacity of 0.1 MMBtu/hr.
  - (4) One (1) natural gas fired heater, identified as H-5, with a maximum heat input capacity of 0.08 MMBtu/hr.
  - (5) One (1) natural gas fired heater, identified as H-6, with a maximum heat input capacity of 0.15 MMBtu/hr.
  - (6) One (1) natural gas fired heater, identified as H-7, with a maximum heat input capacity of 0.154 MMBtu/hr.
  - (7) One (1) natural gas fired heater, identified as HVAC#1, with a maximum heat input capacity of 1.2 MMBtu/hr.
  - (8) One (1) natural gas fired heater, identified as HVAC#2, with a maximum heat input capacity of 0.6 MMBtu/hr.
  - (9) One (1) natural gas fired heater, identified as HVAC#3, with a maximum heat input capacity of 0.8 MMBtu/hr.

- (10) One (1) natural gas fired heater, identified as HVAC#4, with a maximum heat input capacity of 1.5 MMBtu/hr.
- (11) One (1) natural gas fired heater, identified as HVAC#5, with a maximum heat input capacity of 0.5 MMBtu/hr.
- (12) One (1) natural gas fired heater, identified as HVAC#6, with a maximum heat input capacity of 0.6 MMBtu/hr.
- (13) One (1) natural gas fired heater, identified as HVAC#7, with a maximum heat input capacity of 0.9 MMBtu/hr.
- (14) Two (2) natural gas fired heaters, identified as HVAC#8 and HVAC#9, each with a maximum heat input capacity of 0.188 MMBtu/hr.
- (15) Two (2) natural gas fired heaters, identified as HVAC#10 and HVAC#11, each with a maximum heat input capacity of 0.388 MMBtu/hr.
- (16) One (1) natural gas fired heater, identified as ID48, with a maximum heat input capacity of 0.049 MMBtu/hr.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

#### **New Emission Units and Pollution Control Equipment**

The application includes information relating to the construction and operation of the following equipment.

The following new metal fabrication units to be located at the North Street Plant:

- (a) Six (6) CNC vertical machining centers.
- (b) Three (3) CNC lathes.
- (c) One (1) EDM hole drill.
- (d) Four (4) DEM rams.

One (1) medical instrument manufacturing plant, identified as the Boeing Plant, consisting of the following:

- (a) One (1) machining and milling process, constructed in 2004, with a maximum throughput rate of 181 lbs/hr, consisting of the following:
  - (1) One (1) CNC grinder.
  - (2) Four (4) CNC lathes.
  - (3) Four (4) CNC vertical machining centers.
  - (4) Three (3) electrical discharge machines (EDM) for wire.
  - (5) Four (4) laser cutters.

- (6) Two (2) electric ovens.
  - (7) Six (6) standard lathes.
  - (8) Eleven (11) vertical mills.
  - (9) Four (4) surface grinders.
  - (10) Seven (7) hydraulic presses.
- (b) One (1) polishing process, constructed in 2004, with a maximum throughput rate of 172 lbs/hr, consisting of the following:
- (1) Eight (8) polishing jacks, identified as D-1 through D-8, each controlled by a dust collector.
  - (2) Five (5) shot blasters, identified as SB-1 through SB-5, using glass beads as the blast media, each controlled by a dust collector.
- (c) Five (5) parts washers, identified as W1 through W5, constructed in 2004, each with a maximum solvent usage less than 145 gallons per 12 months, using non-halogenated solvents.
- (d) One (1) natural gas fired heater, identified as #3107, constructed in 2004, with a maximum heat input capacity of 0.4 MMBtu/hr.

### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Exemption #085-15794-00059, issued on September 12, 2002.

All conditions from previous approvals were incorporated into this permit.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the construction and operation 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 May 7, 2004. Additional information was received on June 28, 2004 and July 14, 2004.

### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations for the proposed emission units at the Boeing Plant (pages 1 through 3). The emissions from the new metal fabricating units at the North Street Plant are negligible. The emission calculations for the existing units at the

North Street Plant can be found in the TSD for Exemption #085-15794-00059, issued on September 12, 2002.

**Potential to Emit of Revision Before Controls**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit 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, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/year)
PM	7.61
PM10	7.61
SO <sub>2</sub>	Negligible
VOC	0.93
CO	0.15
NO <sub>x</sub>	0.18

HAPs	Potential to Emit (tons/yr)
Total	Negligible

**Potential to Emit of the Source Before Controls**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit 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, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/year)
PM	12.0
PM10	12.2
SO <sub>2</sub>	Negligible
VOC	1.13
CO	3.45
NO <sub>x</sub>	4.08

HAPs	Potential to Emit (tons/yr)
Total	Negligible

Note: The potential to emit of this source includes the PTE of the existing units permitted in Exemption #085-15794-00059, issued September 12, 2002, and the new units in this registration.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-6.1(MSOP).
- (d) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM10 is greater than 5.0 ton/yr. Therefore, the source is not subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (e) Fugitive Emissions  
Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset.

### County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-Hour Ozone	Attainment
1-Hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Kosciusko County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units after controls.

Process/Emission Unit	Potential To Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Polishing Process at Boeing Plant	7.60	7.60	-	-	-	-	-
Parts Washers at Boeing Plant	-	-	-	0.92	-	-	-
NG Fired Heater at Boeing Plant	0.01	0.01	Negligible	0.01	0.15	0.18	Negligible
PTE of the Existing Units at North Street Plant*	4.37	4.58	Negligible	0.20	3.30	3.90	Negligible
Total PTE of the Entire Source	12.0	12.2	Negligible	1.13	3.45	4.08	Negligible

Note: "-" means that such pollutant is not emitted by the facility.

(\*) PTE of the existing units are from the TSD for Exemption #085-15794-00059, issued September 12, 2002.

### Source Status

Existing Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	4.37
PM10	4.58
SO <sub>2</sub>	Negligible
VOC	0.20
CO	3.30
NO <sub>x</sub>	3.90
Combination HAPs	Negligible

- (a) This existing source is not a PSD major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, the PSD requirements of attainment new source review do not apply.
- (b) These emissions are based on the potential to emit of the existing units from the TSD for Exemption #085-15794-00059, issued September 12, 2002.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is based on all the air approvals issued to this source.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the registration for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the registration for this source.
- (c) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63.460 - 63.470, Subpart T) are not included in the registration for this source. The solvents used in the parts washers at this source do not contain any halogenated HAP as defined in 40 CFR 63.460.

### State Rule Applicability – Entire Source

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source was constructed in 1996 and modified in 2002 and 2004 (this modification). The source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1) and the potential to emit PM and all criteria pollutants before controls is less than 250 tons per year. Therefore, the source is a minor source under 326 IAC 2-2 (PSD).

#### 326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The potential to emit HAPs from this modification is less than the major source thresholds for HAPs. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable.

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Kosciusko County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 5-1-2 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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 fifteen (15) minutes (sixty (60) readings 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.

### State Rule Applicability – Metal Fabricating, Machining and Milling, and Polishing Processes

#### 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Particulate emissions from each of the following process shall be limited to the pounds per hour limits listed in the table below:

Process	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
Metal Fabricating Process at North Street Plant	200	0.88
Polishing Process at North Street Plant	200	0.88
Machining and Milling Process at Boeing Plant	181	0.82
Polishing Process at Boeing Plant	172	0.79

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

The use of dust collectors for the polishing units ensures compliance with the limits above.

### **State Rule Applicability – Welding and Torch Cutting Operations**

#### **326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**

Each welding operation at this source consumes less than 625 pounds of wire per day and each torch cutting operation processes less than 3,400 inches per hour of stock with one (1) inch thickness. Pursuant to 326 IAC 6-3-1(b), the welding and torch cutting operations at this source are exempt from the requirements of 326 IAC 6-3.

### **State Rule Applicability – Parts Washers (W1 through W5)**

#### **326 IAC 8-3-2 (Cold Cleaning Operations)**

Any degreasing operation using VOC containing solvents is considered a cold cleaning operation. The parts washers (W1 through W5) at this source will be constructed after January 1, 1980 and are subject to 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the Permittee 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.

#### **326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)**

The parts washers (W1 through W5) at this source will be constructed after July 1, 1990 and will not have remote solvent reservoirs. Therefore, these parts washers are subject to the following requirements of 326 IAC 8-3-5:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) 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));
    - (B) The solvent is agitated; or

- (C) The solvent is heated.
- (2) 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.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (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)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5 (b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) 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.

### **State Rule Applicability – Natural Gas Fired Space Heaters**

There are no specifically applicable requirements for natural gas fired space heaters.

### **Conclusion**

The operation of this medical instrument manufacturing plant shall be subject to the conditions of the Registration No.: 085-19142-00059.

**Appendix A: Emission Calculations  
PM10 and PM10 Emissions  
From the Polishing Process**

**Company Name: Symmetry Medical - Othy Division  
Address: 486 West 350 North, Warsaw, IN 46580  
Registration: 085-19142-00059  
Reviewer: ERG/YC  
Date: July 14, 2004**

Unit ID	Max. Throughput Rate (lbs/hr)	*PM/PM10 Loss %	PTE of PM/PM10 before Control (lbs/hr)	PTE of PM/PM10 before Control (tons/yr)
Polishing Jacks	172	0.2%	1.72	7.53
Shot Blasters	172	1.0%	0.01	0.06
<b>Total</b>				<b>7.60</b>

\* This information is provided by the source based on the dust collected from the process and the mass balance method.

**Methodology**

PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput Rate (lbs/hr) x PM/PM10 Loss %

PTE of PM/PM10 before Control (tons/yr) = Max. Throughput Rate (lbs/hr) x PM/PM10 Loss % x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations**  
**VOC Emissions**  
**From Five (5) Parts Washers (W1 through W5)**

**Company Name: Symmetry Medical - Othy Division**  
**Address: 486 West 350 North, Warsaw, IN 46580**  
**Registration: 085-19142-00059**  
**Reviewer: ERG/YC**  
**Date: July 14, 2004**

Unit	*Solvent Used	Density (lbs/gal)	Weight % VOC	Maximum Usage (gal/day)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)
W1	Inpro Clean 1300	9.98	100%	0.097	0.97	0.18
W2	Inpro Clean 1300	9.98	100%	0.097	0.97	0.18
W3	Inpro Clean 1300	9.98	100%	0.097	0.97	0.18
W4	Dusqueeze	8.22	100%	0.142	1.17	0.21
W5	Inpro Clean 1300	9.98	100%	0.097	0.97	0.18
<b>Total</b>						<b>0.92</b>

\* These solvents do not contain any regulated HAPs.

**METHODOLOGY**

PTE of VOC (lbs/day) = Density (lbs/gal) x Weight % VOC x Max. Usage (gal/day)

PTE of VOC (tons/yr) = Density (lbs/gal) x Weight % VOC x Max. Usage (gal/day) x 365 days/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr < 100)  
From the 0.4 MMBtu/hr Space Heater**

**Company Name: Symmetry Medical - Othy Division  
Address: 486 West 350 North, Warsaw, IN 46580  
Registration: 085-19142-00059  
Reviewer: ERG/YC  
Date: July 14, 2004**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.4

3.5

	Pollutant					
Emission Factor in lbs/MMCF	PM*	PM10*	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
<b>Potential to Emit in tons/yr</b>	<b>0.01</b>	<b>0.01</b>	<b>1.1E-03</b>	<b>0.18</b>	<b>0.01</b>	<b>0.15</b>

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

\*\*Emission factors for NO<sub>x</sub>: Uncontrolled = 100 lbs/MMCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs