



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: July 27, 2006

RE: Symmetry Medical - Othy Division / 085-23056-00059

FROM: Nisha Sizemore
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 03/23/06



Mitchell E. Daniels
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

Mr. Jerry Auer
HSE Manager
Symmetry Medical – Othy Division
486 West 350 North
Warsaw, Indiana 46582

July 27, 2006

Re: Registration Revision, 085-23056-00059

Dear Mr. Auer:

On May 3, 2006, the Office of Air Quality (OAQ) received a letter from Symmetry Medical – Othy Division requesting that the registration be updated to include new equipment consisting of three (3) natural gas-fired HVAC units, each with a heat input rate of 0.324 MMBtu per hour; three natural gas-fired HVAC units, each with a heat input rate of 0.23 MMBtu per hour; and one resident shop heater with a heat input rate of 0.165 MMBtu per hour. Symmetry Medical – Othy Division Also informed OAQ of their intention to move the following existing units to a newly constructed building adjacent to the existing North Plant: three (3) polishing jacks with dust collection, two (2) shot blasters with dust collection, one (1) TIG welder, and one (1) parts washer. The newly constructed building will contain the DDC plant and is located at 3724 State Road 15, Warsaw, 46582. The new plant is contiguous to the existing registered source, has the same SIC code, and is owned by the same company; therefore they are considered one source for the purposes of this registration. Symmetry Medical indicated their intention to move the remaining emission units from the Boeing Plant (previously determined to be collocated with the North Plant) to the North Plant and terminate all activities at the Boeing Plant.

Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following emission units for medical instrument manufacturing, located at 486 West 350 North, Warsaw, Indiana 46582 (the North Plant) and 3724 State Road 15, Warsaw, Indiana (the DDC Plant) are classified as registered:

The following emission units are located at the North 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) Five (5) 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.
- (d) Two (2) natural gas-fired water evaporators, identified as EV-01 and EV-02, constructed in 2005, each with a maximum heat input capacity of 0.2 MMBtu/hr, and exhausting to stack vents EVSV-01 and EVSV-02, respectively.
- (e) 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.
- (f) One (1) polishing process, constructed in 2004, with a maximum throughput rate of 172 lbs/hr, consisting of the following:
 - (1) Five (5) polishing jacks, identified as D-1 through D-5, each controlled by a dust collector.
 - (2) Three (3) shot blasters, identified as SB-1 through SB-3, using glass beads as the blast media, each controlled by a dust collector.
- (g) Four (4) parts washers, identified as W1 through W4, constructed in 2004, each with a maximum solvent usage less than 145 gallons per 12 months, using non-halogenated solvents.
- (h) 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 emission units are located at the DDC Plant:

- (a) Three polishing jacks, identified as D-6 through D-8, each controlled by a dust collector.
- (b) One (1) parts washer, identified as W5, constructed in 2004, with a maximum solvent usage less than 145 gallons per 12 months, using non-halogenated solvents.
- (c) Two (2) shot blasters, identified as SB-4 and SB-5, using glass beads as the blast media, each controlled by a dust collector.
- (d) One (1) TIG welder, with a maximum metal consumption of 2.43 lbs/hr.

- (e) Three (3) natural gas-fired HVAC units, identified as HVAC#12, HVAC#13, and HVAC#14, each with a heat input rate of 0.324 MMBtu/hr.
- (f) Three (3) natural gas-fired HVAC units, identified as HVAC#15, HVAC#16, and HVAC#17, each with a heat input rate of 0.23 MMBtu/hr.
- (g) One (1) natural gas-fired resident shop heater, identified as RSH-1, with a heat input rate of 0.165 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 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.
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 and DDC Plants	200	0.88
Polishing Process at North Plant (PJC01 through PJC-42)	200	0.88
Machining and Milling Process at North Plant	181	0.82
Polishing Process at North and DDC Plants (D1 through D8 and SB1 through SB5)	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):
 - (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), for each of the parts washers (W1 through W5), the owner or operator shall ensure that the following control equipment requirements are met for each of the cold cleaner degreasing units:
- (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), for each of the parts washers (W1 through W5), the owner or operator shall ensure that the following operating requirements are met for each of the cold cleaner degreasing units:
 - (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 a revised 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
Indianapolis, IN 46204-2251**

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. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Ms. Stacie Enoch, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7895 to speak directly to Ms. Enoch. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251 or call (800) 451-6027, ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

ERG/SE

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

Registration Annual Notification

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

Company Name:	Symmetry Medical - Othy Division
Address (North Plant):	486 West 350 North, Warsaw, Indiana 46582
Address (DCC Plant):	3724 State Road 15, Warsaw, Indiana 46582
City:	Warsaw, Indiana 46582
Authorized individual:	Jerry Auer
Phone #:	(574) 267-8700
Registration #:	085-23056-00059

I hereby certify that Symmetry Medical - Othy Division, is still in operation and is in compliance with the requirements of Registration No. 085-23056-00059.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration Revision

Source Background and Description

Source Name:	Symmetry Medical – Othy Division
Address (North Plant):	486 West 350 North, Warsaw, Indiana 46582
Address (DDC Plant):	3724 State Road 15, Warsaw, Indiana 46582
County:	Kosciusko
SIC Code:	3842
Registration No.:	085-23056-00059
Permit Reviewer:	ERG/SE

On May 3, 2006, the Office of Air Quality (OAQ) received an application from Symmetry Medical – Othy Division relating to the construction and operation of six (6) natural gas-fired HVAC units and one (1) natural gas-fired heater that are being added to a new plant at the existing stationary medical instrument manufacturing source.

History

The source consists of two plants (the North Plant and the DDC Plant) that are considered to be a single source (see “Source Definition” below). In 2006 the source terminated all activities at the Boeing Plant, which was located at 2094 North Boeing Plant, Warsaw, Indiana 46582.

Source Definition

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

- (1) North Plant, an existing plant, located at 486 West 350 North, Warsaw, Indiana 46582, started operation in 1996 (SIC code: 3842); and
- (2) DDC Plant, a new plant, located at 3724 State Road 15, Warsaw, Indiana 46582, starting operation in 2006 (SIC code: 3842).

Since the two (2) plants have the same SIC codes, manufacture the same products, are owned by the same company, and the DDC Plant is adjacent to the North Plant (less than one mile apart), IDEM, OAQ has determined that the North Plant and the DDC Plant are considered a single source.

New Emission Units and Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following emission units at the DDC Plant:

- (e) Three (3) natural gas-fired HVAC units, identified as HVAC#12, HVAC#13, and HVAC#14, each with a heat input rate of 0.324 MMBtu/hr.
- (f) Three (3) natural gas-fired HVAC units, identified as HVAC#15, HVAC#16, and HVAC#17, each with a heat input rate of 0.23 MMBtu/hr.
- (g) One (1) natural gas-fired resident shop heater, identified as RSH-1, with a heat input rate of 0.165 MMBtu/hr.

Registered Emission Units and Pollution Control Equipment

The following emission units are located at the North 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) Five (5) 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.
- (d) Two (2) natural gas-fired water evaporators, identified as EV-01 and EV-02, constructed in 2005, each with a maximum heat input capacity of 0.2 MMBtu/hr, and exhausting to stack vents EVSV-01 and EVSV-02, respectively.
- (e) 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.
- (f) One (1) polishing process, constructed in 2004, with a maximum throughput rate of 172 lbs/hr, consisting of the following:
- (1) Five (5) polishing jacks, identified as D-1 through D-5, each controlled by a dust collector.

- (2) Three (3) shot blasters, identified as SB-1 through SB-3, using glass beads as the blast media, each controlled by a dust collector.
- (g) Four (4) parts washers, identified as W1 through W4, constructed in 2004, each with a maximum solvent usage less than 145 gallons per 12 months, using non-halogenated solvents.
- (h) 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 emission units are located at the DDC Plant: (moved from the North and Boeing Plant):

- (a) Three polishing jacks, identified as D-6 through D-8, each controlled by a dust collector.
- (b) One (1) parts washer, identified as W5, constructed in 2004, with a maximum solvent usage less than 145 gallons per 12 months, using non-halogenated solvents.
- (c) Two (2) shot blasters, identified as SB-4 and SB-5, using glass beads as the blast media, each controlled by a dust collector.
- (d) One (1) TIG welder, with a maximum metal consumption of 2.43 lbs/hr.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

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

- (a) Exemption #085-15794-00059, issued on September 12, 2002;
- (b) Registration #085-19142-00059, issued on September 24, 2004; and
- (c) Registration - Notice Only Change #085-21029-00059, issued on April 7, 2005.

All conditions from previous approvals were incorporated into this registration.

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 3, 2006. Additional information was received on June 26, 2006 and July 6, 2006.

Emission Calculations

See Appendix A of this document for detailed emissions calculations for the new natural gas combustion emission units (pages 1 and 2).

Based on the previous approvals for this source, emissions of regulated pollutants and hazardous air pollutants (HAPs) are negligible for the following emission units:

- (a) Milling and machining operations (grinders, lathes, milling machines, EDMs, cutting machines, CNC machining centers, EDM rams, presses);
- (b) Electric ovens;
- (c) Tungsten inert gas (TIG) stations; and
- (d) Oxyacetylene stations

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	11.33
PM10	11.62
SO ₂	0.03
NO _x	5.01
VOC	0.34
CO	4.21

HAPs	Potential to Emit (tons/yr)
Diethanolamine	0.01
Benzene	negligible
Dichlorobenzene	negligible
Formaldehyde	negligible
n-Hexane	0.09
Toluene	negligible
Lead	negligible
Cadmium	negligible
Chromium	negligible
Cobalt	negligible
Manganese	negligible
Nickel	negligible
Total HAPs	0.10

- (a) The PTE (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than twenty-five (25) tons per year, but the PTE of PM and PM-10 is greater than five (5) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.
- (b) The PTE (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE 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) 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
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-Hour Ozone	Attainment
8-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 standard. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Kosciusko County has been classified as attainment or unclassifiable 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. See the State Rule Applicability for the source section.

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	11.33
PM10	11.62
SO ₂	0.03
NO _x	5.01
VOC	0.34
CO	4.21
Combination HAPs	0.10
Worse Case HAP	0.09

This source is not a major PSD 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, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this registration 085-23056-00059 is still not subject to the Part 70 Permit requirements because the 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 status is based on all the air approvals issued to the 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) This source is not subject to the requirements of 40 CFR 63, Subpart DDDDD, (63.7480 through 63.7575), NESHAPs for Industrial, Commercial, and Institutional Boilers and Process Heaters, because the source is not a major source of HAPs.
- (c) This source is not subject to the requirements of the 40 CFR 63 Subpart T (63.460 through 63.470), NESHAP for for Halogenated Solvent Cleaning, because this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (d) 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.

State Rule Applicability – Entire Source

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

This source was constructed after the applicability date of August 7, 1977, however, it is not one of the 28 listed source categories defined in 326 IAC 2-2-1(y)(1), no major modifications were done at this source, and the uncontrolled potential to emit of all attainment regulated pollutants is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable and the source remains a minor source under PSD for future modification.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The requirements of 326 IAC 2-4.1 are not applicable to this source, since the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Kosciusko County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

326 IAC 5-1 (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, unless otherwise stated in this permit:

- (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.

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

The requirements of 326 IAC 8-1-6 are not applicable, because none of the emission units at this source have the potential to emit greater than twenty-five (25) tons of VOC per year.

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 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 and DDC Plants	200	0.88
Polishing Process at North Plant (PJC01 through PJC42)	200	0.88
Machining and Milling Process at North Plant	181	0.82
Polishing Process at North and DDC Plants (D1 through D8 and SB1 through SB5)	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 – Natural Gas Combustion Sources

326 IAC 4-2-2 (Incinerators)

The natural gas-fired heaters and water evaporators are not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, these units are not subject to 326 IAC 4-2-2.

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired heaters and water evaporators are not subject to 326 IAC 6-2 because they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), each of the natural gas-fired heaters and water evaporators are exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 7-1.1 (Sulfur dioxide emission limitations: applicability)

The natural gas-fired heaters and water evaporators are each not subject to the requirements of 326 IAC 7-1.1, because the potential emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour.

State Rule Applicability – Parts Washers (W1 through W5)

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

Pursuant to 326 IAC 8-3-1 (Organic Solvent Degreasing Operations), the parts washers (W1 through W5) are each subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations), since they were each constructed after the applicability date of January 1, 1980. Pursuant to this rule, 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; 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.

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

Pursuant to 326 IAC 8-3 (Organic Solvent Degreasing Operations), each of the parts washers (W1 through W5) are subject to the requirements of 326 IAC 8-3-5, since these units were constructed after the July 1, 1990 applicability date. Pursuant 326 IAC 8-3-5(a), for each of the cold cleaner degreasing units, the owner or operator 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^oC) (one hundred degrees Fahrenheit (100^oF));
 - (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^oC) (one hundred degrees Fahrenheit (100^oF)), 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 326 IAC 8-3-5(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) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (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 of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant 326 IAC 8-3-5(b), for each of the cold cleaner degreasing units, the owner or operator 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 - Welding Operations

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

Pursuant to 326 IAC 6-3-1(b)(9), the metal inert gas (MIG) welding station is exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire is less than six hundred twenty-five (625) pounds per day.

State Rule Applicability - Torch Cutting Operations

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

Pursuant to 326 IAC 6-3-1(b)(10), each of the two (2) oxyacetylene stations are exempt from the requirements of 326 IAC 6-3, because each station has a maximum cutting rate of less than 3,400 inches per hour of stock with one (1) inch thickness

Conclusion

The operation of this medical instrument manufacturing plant shall be subject to the conditions of the Registration No.: 085-23056-00059.

**Appendix A: Emission Calculations
New Natural Gas Combustion Units DDC Plant**

**Company Name: Symmetry Medical - Othy Division
Address: 486 West 350 North, Warsaw, IN 46580
Registration: 085-23056-00059
Reviewer: ERG/SE
Date: May 30, 2006**

Heat Input Capacity
MMBtu/hr

1.8

Potential Throughput
MMCF/yr

15.7

	PM*	PM10*	SO ₂	**NO _x	VOC	CO	Total HAPs
Emission Factor in lbs/MMCF	1.9	7.6	0.6	100	5.5	84.0	1.89
Potential to Emit in tons/yr	0.01	0.06	0.00	0.78	0.04	0.66	0.01

*PM emission factor is for PM filterable only. PM10 emission factor is for condensable and filterable PM combined.

**Emission factor for NO_x: Uncontrolled = 100 lbs/MMCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 7/98)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Methodology

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Appendix A: Emission Calculations
HAP Emissions from New Natural Gas Combustion Units DDC Plant

Company Name: Symmetry Medical - Othy Division
Address: 486 West 350 North, Warsaw, IN 46580
Registration: 085-23056-00059
Reviewer: ERG/SE
Date: May 30, 2006

Heat Input Capacity
MMBtu/hr

1.8

Potential Throughput
MMCF/yr

15.7

Emission Factor in lbs/MMCF	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03	Total HAPs 1.89
Potential to Emit in tons/yr	1.65E-05	9.41E-06	5.88E-04	0.01	2.67E-05	3.92E-06	8.63E-06	1.10E-05	2.98E-06	1.65E-05	0.01

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-3 and 1.4-4, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 7/98)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Methodology

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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