



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: January 10, 2007

RE: Symmetry Medical USA, Inc. - Claypool / 085-23919-00100

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

January 10, 2007

Mr. Jerry Auer
HSE Manager
Symmetry Medical USA, Inc. Claypool
486 West 350 North
Warsaw, Indiana 46582

Re: Registration Revision No. 085-23919-00100
to Registration 085-20412-00100

Dear Mr. Auer:

The application for a modification request from Symmetry Medical USA, received on November 20, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following stainless steel surgical instruments manufacturing source, located at 111 North Clay Street, Claypool, IN 46510, is classified as registered:

The following emission units are located at the Claypool:

- (a) Six (6) natural gas fired radiant heaters, identified as H-01 through H-06 and each having a capacity of 0.1 MMBtu per hour;
- (b) Two (2) natural gas fired HVAC units, identified as HVAC-01 and HVAC-02 and each having a capacity of 0.2 MMBtu per hour;
- (c) Five (5) natural gas fired HVAC units, identified as HVAC-03 through HVAC-07 and each having a capacity of 0.4 MMBtu per hour;
- (d) Four (4) glass bead blasting units, identified as BB-01 through BB-04 and each having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as BBC-01 through BBC-04, for particulate control and exhausting to interior of building;
- (e) Ten (10) polishing jacks, identified as PJ-01 through PJ-10 and each having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as PJC-01 through PJC-10, for particulate control and exhausting to interior of building;
- (f) Two (2) impro-clean parts washers, identified as PW-01 and PW-02, with a maximum solvent usage of less than 145 gallons per twelve (12) month period, using nonhalogenated solvents and exhausting to interior of building;
- (g) Vehicular traffic on paved plant roads with maximum capacity of 1,168 vehicle miles traveled per year;
- (h) One (1) welding operation station using non-consumable gas tungsten arc welding with no particulate and hazardous air pollutant emissions;
- (i) Sixteen (16) metal fabrication CNC lathes with no regulated air pollutant emissions.

- (j) Ten (10) metal fabrication milling machines with no regulated air pollutant emissions.
- (k) Three (3) metal fabrication cutting/drilling stations with no regulated air pollutant emissions.
- (l) One (1) tungsten inert gas (TIG) station, with a maximum wire consumption rate less than 625 lbs/day.

The following conditions shall be applicable:

1. Pursuant to 326 IAC 1-6-3 (Preventive Maintenance), the following shall apply:
 - (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
 - (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
 - (c) PMP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM and OAQ.
2. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of 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.
3. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following units shall not exceed 0.88 pounds per hour when operating at a maximum process weight rate of 200 pounds per hour:
 - (a) Each of the four (4) glass bead blasting units, identified as BB-01 through BB-04; and
 - (b) Each of the Ten (10) polishing jacks, identified as PJ-01 through PJ-10.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 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 Permittee shall operate the dust collectors, identified as BBC-01 through BBC-03 (for glass bead blasting units) and PJC-01 through PJC-07 (for polishing jacks); at all times the units are in operation.

4. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Operation), the owner or operator of a cold cleaning facility shall:
 - (a) equip the cleaner with a cover;
 - (b) equip the cleaner with a facility for draining cleaned parts;
 - (c) close the degreaser cover whenever parts are not being handled in the cleaner;
 - (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (e) provide a permanent, conspicuous label summarizing the operating 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.

5. Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), the following shall apply:
 - (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (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) kilo-Pascals (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) 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)), 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) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (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 owner or operator of a cold cleaning facility 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 revised registration is the second air approval 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.

Sincerely,

Original document signed by

Nisha Sizemore, Chief
Permit Branch
Office of Air Quality

KSR/EVP

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

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) or 326 IAC 2-5.5-4(a)(3)

Company Name:	Symmetry Medical USA, Inc. Claypool
Address:	486 West 350 North
City:	Warsaw, Indiana 46582
Authorized individual:	Jerry L. Auer
Phone #:	574-371-2221
Registration #:	085-23919-00100

I hereby certify that Symmetry Medical USA, Inc. Claypool is still in operation and is in compliance with the requirements of Registration 085-23919-00100.

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 USA, Inc. Claypool
Source Location:	111 North Clay Street, Claypool, IN 46510
County:	Kosciusko
SIC Code:	3842
Registration No.:	085-20412-00100
Permit Revision No.:	085-23919-00100
Permit Reviewer:	Surya Ramaswamy

The Office of Air Quality (OAQ) has reviewed an application from Symmetry Medical USA, Inc. Claypool relating to the addition of three (3) polishing stations, six (6) milling machines, one (1) tungsten inert gas (TIG) station, and one (1) shot blaster.

History

Symmetry Medical USA, Inc. Claypool was issued a registration (085-20412-00100) for the manufacturing of stainless steel surgical instruments on January 28, 2005.

On November 20, 2006, the Office of Air Quality (OAQ) received a letter from Symmetry Medical USA, Inc. - Claypool Division requesting that the registration be updated to move the above existing units from Symmetry Medical – Othy Division (085-00059) to Symmetry Medical USA, Inc. - Claypool Division (085-00100).

New Emission Units and Pollution Control Equipment

The source proposed to add the following units:

- (a) Three (3) polishing jacks, identified as PJ-08 through PJ-10, each having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as PJC-08 through PJC-10, for particulate control and exhausting inside the building.
- (b) Six (6) milling machines with no regulated air pollutant emissions.
- (c) One (1) tungsten inert gas (TIG) station, with a maximum wire consumption rate less than 625 lbs/day.
- (d) One (1) glass bead blasting unit, identified as BB-04 and having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as BBC-04, for particulate control and exhausting inside the building.

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) Registration Permit No.085-20412-00100 issued on January 28, 2005;

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.

A complete application for the purposes of this review was received on November 20, 2005.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Pages 1 to 3).

Potential to Emit of the Revision

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/yr)
PM	4.65
PM-10	4.65
SO ₂	0.00
VOC	0.00
CO	0.00
NO _x	0.00

HAPs	Potential to Emit (tons/yr)
Total	0.06 (Manganese)

The potential to emit (as defined in 326 IAC 2-7-1(29)) of CO is less than one hundred (100) tons per year, and the potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants is less than twenty-five (25) tons per year. Therefore, the source is registered and subject to the provisions of 326 IAC 2-5.1-2.

Justification for the Revision

This application is a Registration Revision request because it is not a Notice-Only change per 326 IAC 2-5.5-6(d) and, therefore, it is reviewed pursuant to 326 IAC 2-5.5-6(g).

This revision application is being processed pursuant to 326 IAC 2-5.5-6(h). After this Registration Revision, 085-23919-00100, the potential to emit PM, SO₂, VOC, and NO_x remains less than twenty five (25) tons per year, and potential to emit CO remains less than one hundred (100) tons per year. Therefore, the source is still subject to the provisions of 326 IAC 2-5.5.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Kosciusko County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (d) 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.
- (e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	17.03
PM-10	11.98
SO ₂	0.01
VOC	0.42
CO	1.10
NO _x	1.31
Single HAP	0.06 (Manganese)
Combination HAPs	0.10

- (a) This existing source is not a major stationary source under PSD 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.
- (b) These emissions are based on the emission calculations performed for the Registration Revision No. 085-23919-00100.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this approval 085-23919-00100, is still 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 status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned 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 this review.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this review.

State Rule Applicability – Entire Source

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

This source is not subject to this rule because potential uncontrolled emissions of all criteria pollutants are less than 250 tons per year. This source is also not one of the 28 listed source categories. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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 the 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 2-4.1 (New Source of Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because the source has PTE of any HAP less than 10 tons per year and PTE of any combination of HAPs less than 25 tons per year. Therefore, 326 IAC 2-4.1-1 does not apply.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to this rule the particulate matter (PM) from the facilities shall be limited by the following:

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 maximum process rate for one (1) glass bead blasting unit, identified as BB-04, is 200 pounds per hour. Hence, based on the above formula the allowable particulate emission rate for the glass bead blasting unit shall be 0.88 pounds per hour.

The maximum process rate for each of the three (3) polishing jacks, identified as PJ-08 through PJ-10, is 200 pounds per hour. Hence, based on the above formula the allowable particulate emission rate for each unit shall be 0.88 pounds per hour.

Based on the emission calculation performed Appendix A (page 2 of 3), emission units identified as BBC-04 and PJC-08 through PJC-10, will be able to comply with the requirements of 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-1(b)(9), the welding operation is exempt from the requirements of 326 IAC 6-3-2, because each welding operation consumes less than 625 pounds of rod or wire per day.

Proposed Changes

The following changes were made to the Registration 085-20412-00100.

The application **for a revision request** from Symmetry Medical USA, received on ~~November 24, 2004~~ **November 20, 2006**, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following stainless steel surgical instruments manufacturing source, located at 111 North Clay Street, Claypool, IN 46510, is classified as registered:

- (a) Six (6) natural gas fired radiant heaters, identified as H-01 through H-06 and each having a capacity of 0.1 MMBtu per hour;

- (b) Two (2) natural gas fired HVAC units, identified as HVAC-01 and HVAC-02 and each having a capacity of 0.2 MMBtu per hour;
- (c) Five (5) natural gas fired HVAC units, identified as HVAC-03 through HVAC-07 and each having a capacity of 0.4 MMBtu per hour;
- (d) ~~Three (3)~~ **Four (4)** glass bead blasting units, identified as BB-01 through ~~BB-03~~ **BB-04** and each having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as BBC-01 through ~~BBC-03~~ **BBC-04**, for particulate control and exhausting to interior of building;
- (e) ~~Seven (7)~~ **Ten (10)** polishing jacks, identified as PJ-01 through ~~PJ-07~~ **PJ-10** and each having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as PJC-01 through ~~PJC-07~~ **PJC-10**, for particulate control and exhausting to interior of building;
- (f) Two (2) impro-clean parts washers, identified as PW-01 and PW-02, with a maximum solvent usage of less than 145 gallons per twelve (12) month period, using non-halogenated solvents and exhausting to interior of building;
- (g) Vehicular traffic on paved plant roads with maximum capacity of 1,168 vehicle miles traveled per year;
- (h) One (1) welding operation station using non-consumable gas tungsten arc welding with no particulate and hazardous air pollutant emissions;
- (i) Sixteen (16) metal fabrication CNC lathes with no regulated air pollutant emissions.
- (j) ~~Four (4)~~ **Ten (10)** metal fabrication milling machines with no regulated air pollutant emissions.
- (k) Three (3) metal fabrication cutting/drilling stations with no regulated air pollutant emissions.
- (l) One (1) tungsten inert gas (TIG) station, with a maximum wire consumption rate less than 625 lbs/day.**

The following conditions shall be applicable:

1. Pursuant to 326 IAC 1-6-3 (Preventive Maintenance), the following shall apply:
 - (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
 - (c) PMP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM and OAQ.
2. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
- (a) Opacity shall not exceed an average of 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.
3. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following units shall not exceed 0.88 pounds per hour when operating at a maximum process weight rate of 200 pounds per hour:
- (a) Each of the ~~three (3)~~ **four (4)** glass bead blasting units, identified as BB-01 through ~~BB-03~~ **BB-04**; and
 - (b) Each of the ~~Seven (7)~~ **Ten (10)** polishing jacks, identified as PJ-01 through ~~PJ-07~~ **PJ-10**.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 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 Permittee shall operate the dust collectors, identified as BBC-01 through BBC-03 (for glass bead blasting units) and PJC-01 through PJC-07 (for polishing jacks); at all times the units are in operation ~~to be in compliance with 326 IAC 6-3-2.~~

4. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Operation), the owner or operator of a cold cleaning facility shall:
- (a) equip the cleaner with a cover;
 - (b) equip the cleaner with a facility for draining cleaned parts;
 - (c) close the degreaser cover whenever parts are not being handled in the cleaner;
 - (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (e) provide a permanent, conspicuous label summarizing the operating 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.
5. Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), the following shall apply:
- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (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) kilo-Pascals (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) 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)), 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) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (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 owner or operator of a cold cleaning facility 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 **revised** registration is the ~~first~~ **second** air approval 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 2-5.1-2(f)(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~~ **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.

Conclusion

The Symmetry Medical USA, Inc. Claypool operation's shall be subject to the conditions of the attached Registration Revision No. 085-23919-00100.

Appendix A: Emission Calculations

Company Name: Symmetry Medical USA, Inc. Claypool
Address City IN Zip: 111 North Clay Street, Claypool, IN 46510
Registration: 085-23919-00100
Reviewer: Surya Ramaswamy/EVP
Date: 1/18/2007

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Milling	Polishing Jacks and Bead Blasters Dust Collectors	Welding	TOTAL
PM	0.00	3.43	0.63	4.06
PM10	0.00	3.43	0.63	4.06
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	0.00	0.00	0.00	0.00
CO	0.00	0.00	0.00	0.00
total HAPs	0.00	0.00	0.06	0.06
worst case single HAP	0.00	0.00	0.06	0.06
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Milling	Polishing Jacks and Bead Blasters Dust Collectors	Welding	TOTAL
PM	0.00	0.04	0.63	0.67
PM10	0.00	0.04	0.63	0.67
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	0.00	0.00	0.00	0.00
CO	0.00	0.00	0.00	0.00
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year, after control.				

**Appendix A: Process Particulate Emissions
Bead Blasters and Polishing/Grinding Stations
Dust Collectors (BBC01-04 and PJC01-10)**

Company Name: Symmetry Medical USA, Inc. Claypool
Address City IN Zip: 111 North Clay Street, Claypool, IN 46510
Registration: 085-23919-00100
Reviewer: Surya Ramaswamy/EVP
Date: 1/18/2007

Emission Unit Description	Outlet Grain Loading (gr/acf)	Control Device Fan Flow Rate (acfm)	PM Control Efficiency (%)	Potential PM Emission Rate				Process Weight Rate (lb/hr)	326 IAC 6-3-2 PM Emission Rate (lb/hr)	Equivalent 326 IAC 6-3-2 PM Emission Rate (tons per year)
				Before Controls (lb/hr)	Before Controls (tons/yr)	After Controls (lb/hr)	After Controls (tons/yr)			
BBC-04	0.002185	400	98%	0.75	3.28	0.0075	0.0328	200	0.88	3.84
PJC-08	0.00012	550	95%	0.01	0.05	0.0006	0.0025	200	0.88	3.84
PJC-09	0.00012	550	95%	0.01	0.05	0.0006	0.0025	200	0.88	3.84
PJC-10	0.00012	550	95%	0.01	0.05	0.0006	0.0025	200	0.88	3.84
Total					3.43		0.04			

Methodology:

Potential Uncontrolled Emissions (tons/yr) = Outlet Loading (grains/acf) * Fan Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs / (1- Control Efficiency)
 Potential Controlled Emissions (tons/yr) = Outlet Loading (grains/acf) * Fan Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs
 Total PM is assumed equal to PM-10.

The allowable PM emission rate pursuant to 326 IAC 6-3-2(c), Process Operations, for weight rates up to 60,000 lb/hr is determined using the following formula:
 $E = 4.1 * P^{0.67}$ where: E = allowable PM emission rate (lb/hr)
 P = process weight rate (tons/hr)

Appendix A: Welding and Thermal Cutting

Company Name: Symmetry Medical USA, Inc. Claypool
Address City IN Zip: 111 North Clay Street, Claypool, IN 46510
Registration: 085-23919-00100
Reviewer: Surya Ramaswamy/EVP
Date: 1/18/2007

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Tungsten Inert Gas (TIG)	1	26.04	0.0055	0.0005			0.1432	0.0130	0.000	0	0.013
EMISSION TOTALS							PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr							0.14	0.01	0.00	0.00	0.01
Potential Emissions lbs/day							3.44	0.31	0.00	0.00	0.31
Potential Emissions tons/year							0.63	0.06	0.00	0.00	0.06

METHODOLGY

See AP-42, Chapter 12.19 for additional emission factors for welding.