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
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: December 15, 2006

RE: Symmetry Medical / 085-24036-00059

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

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 from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 03/23/06

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

December 15, 2006

Re: 085-24036-00059
Second Notice Only Change to Registration
085-19142-00059

Dear Mr. Auer:

Symmetry Medical – Othy Division was issued a Registration on September 24, 2004 for the operation of a Stainless steel surgical instruments manufacturing. A letter requesting to remove three (3) polishing stations, six (6) milling machines, one (1) tungsten inert gas (TIG) station, and one (1) shot blaster from the facility was received on November 20, 2006. These emission sources are no longer in operation at the source and therefore the permit is hereby revised as follows, pursuant to the provisions of 326 IAC 2 5.5-6(d)(2) (with new language bolded and old language stricken):

~~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 in formed 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.~~

The application of modification request from Symmetry Medical – Othy Division, received on November 20th 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 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 Othy Division:

(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)~~ **Forty-one (41)** 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)~~ **Three (3)** tungsten inert gas (TIG) stations, each with a maximum wire consumption rate less than 625 lbs/day.
(8) Two (2) oxyacethylene 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)~~ **thirty-nine (39)** polishing stations, identified as PJC-01 through ~~PJC-42~~ **PJC-39**, with a total throughput rate of 200 lbs/hr, each controlled by a dust collector.

.....

(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)~~ **Two (2)** shot blasters, identified as SB-1 through ~~SB-3~~ **SB-2**, using glass beads as the blast media, each controlled by a dust collector.

.....

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~~ **PJC-39**)	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~~ **, SB2, SB4, and** 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:

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

....

IDEM/OAQ has updated the following information:

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~~ **46204-2251**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

All other conditions of the permit shall remain unchanged and in effect.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Surya Ramaswamy, at (973) 575-2555, ext. 3216 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original 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

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

December 15, 2006

Re: 085-24036-00059
Second Notice Only Change to Registration
085-19142-00059

Dear Mr. Auer:

The application of modification request from Symmetry Medical – Othy Division, received on November 20th 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 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 Othy Division:

(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-one (41) 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) Three (3) tungsten inert gas (TIG) stations, each with a maximum wire consumption rate less than 625 lbs/day.
(8) Two (2) oxyacethylene 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 thirty-nine (39) polishing stations, identified as PJC-01 through PJC-39, 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 andEVSV-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) Two (2) shot blasters, identified as SB-1 through SB-2, 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-39)	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, SB2, SB4, and 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:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = 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^{o}C) (one hundred degrees Fahrenheit (100^{o}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 that four and three-tenths (4.3) kiloPascals (thirty-two (32 millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{o}C) (one hundred degrees Fahrenheit (100^{o}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

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

(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 registration 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.

Sincerely,

Original 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 (North Plant): **Address (DCC Plant):**	**486 West 350 North, Warsaw, Indiana 46582** **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-XXXXX-00059.

Name (typed):
Title:
Signature:
Date: