



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: May 11, 2007
RE: Symmetry Medical, Inc. / 113-24218-00082
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



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
MC 61-53 IGCN 1002
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

Mr. Cliff Petty
Symmetry Medical, Inc., UlteXX Division
200 Progress Way West
Avila, Indiana 46710

May 11, 2007

Re: Exempt Construction and Operation Status,
113-24218-00082

Dear Mr. Petty:

The application from Symmetry Medical, Inc., UlteXX Division, received on January 22, 2007, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following orthopedic implant and instrument manufacturing source, located at 200 Progress Way West, Avila, Indiana 46710, is classified as exempt from air pollution permit requirements:

- (a) One (1) metal etching operation, identified as ME, installed in 1988, equipped with one (1) metal etch bath that uses Power Kleen 500 (a nonvolatile solution) and one (1) nitric acid cleaning facility, capacity: 2.967 pounds of orthopedic implant and instrument parts per hour.
- (b) Two (2) grinding and machining operations, identified as MF1 Grinder and MF2 Grinder, installed in 2004, equipped with one (1) baghouse used for particulate control, identified as DC3, exhausting inside, capacity: 1.142 pounds of metal orthopedic implants per hour total.
- (c) Two (2) grinding and machining operations, identified as MF4 Grinder and MF5 Grinder, installed in 2004, equipped with one (1) baghouse used for particulate control, identified as DC3, exhausting inside, capacity: 6.798 pounds of metal orthopedic instruments per hour total.
- (d) Six (6) small bench style buffing jacks, used to polish metal parts, identified as MF6, MF7, MF8, MF9, MF10, and MF11, approved for installation in 2007, equipped with one (1) baghouse used for particulate control, identified as DC3, exhausting inside, capacity: 0.857 pounds per hour of stainless steel parts, each, or 0.268 pounds per hour of titanium parts, each.

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.

This exemption shall supersede the Exemption 113-19654-00082, issued on January 25, 2005.

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
Permits Branch
Office of Air Quality

BJP/MES

cc: File - Noble County
Noble County Health Department
Air Compliance – Mr. Doyle Houser
Permit Tracking
Compliance Data Section
Northern Regional Office
Billing, Licensing, and Training – Dan Stamatkin

Appendix A: Emission Calculations
Grinding, Metal Etching, and Buffing Operations

Company Name: Symmetry Medical, Inc., UlteXX Division
Address City IN Zip: 200 Progress Way West, Avilla, Indiana 46710
Exemption Number: 113-24218-00082
Reviewer: Brian J. Pedersen
Date: May 11, 2007

Metal Grinding and Buffing:

Unit ID	Control Efficiency (%)	PM Emission Factor (lbs/ton)	PM ₁₀ Emission Factor (lbs/ton)	Capacity (lbs/hr)	PM Emission Rate before Controls (lbs/hr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (tons/yr)
Grinders MF1, MF2, MF4, and MF5, Buffers MF6, MF7, MF8, MF9, MF10, and MF11 (Baghouse DC3)	99.8%	17.0	1.700	13.1	0.111	0.0002	0.487	0.001

PM ₁₀ Emission Rate before Controls (lbs/hr)	PM ₁₀ Emission Rate after Controls (lb/hr)	PM ₁₀ Emission Rate before Controls (tons/yr)	PM ₁₀ Emission Rate after Controls (tons/yr)
0.011	0.00002	0.049	0.0001

Metal Etching:

Unit ID	Usage Rate (lbs/hour) of Nitric Acid	PM/PM ₁₀ Emissions (tons/year)
ME	0.012	0.053

Methodology

Emission Rate for PM an PM₁₀ before controls (lbs/hr) = Emission Factor (lbs/ton) * Capacity (lbs/hr) * (1 ton/2000 lbs)
 Emission Rate for PM and PM₁₀ before controls (tons/yr) = Emission Rate (lbs/hr) * (8760 hours/1 year) * (1 ton/2000 lbs)

Emission Rate for PM and PM₁₀ after controls (lbs/hr) = Emission Rate (lbs/hr) before controls * (1-control efficiency)
 Emission Rate for PM and PM₁₀ after controls (tons/yr) = Emission Rate after controls (lbs/hr) * (8760 hours/1 year) * (1 ton/2000 lbs)

Emission factors are from Fire 6.25 SCC# 30400340 (Grey Iron Foundries- Grinding and Cleaning)

Emission Rate for Metal Etching (tons/yr) = Usage Rate (pounds per hour) of Nitric Acid * 8760 hours/year * 1 ton/2000 pounds