



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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Indianapolis, Indiana 46204  
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TO: Interested Parties / Applicant  
DATE: February 22, 2008  
RE: DePuy Orthopaedics, Inc. / 085-24607-00048  
FROM: Matthew Stuckey, Deputy Branch Chief  
Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval - Effective Immediately**

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require 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, Suite N 501E, 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  
FNPER.dot12/03/07



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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**DePuy Orthopaedics, Inc.  
700 Orthopaedic Drive  
Warsaw, Indiana 46581-0988**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F085-24607-00048	
Issued by/Original Signed By:  Matt Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: February 22, 2008  Expiration Date: February 22, 2018

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY.....</b>	<b>4</b>
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
<b>B. GENERAL CONDITIONS .....</b>	<b>5</b>
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.17 Permit Renewal [326 IAC 2-8-3(h)]	
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20 Source Modification Requirement [326 IAC 2-8-11.1]	
B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS .....</b>	<b>15</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.8 Performance Testing [326 IAC 3-6]	

**Compliance Requirements [326 IAC 2-1.1-11]**

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]  
[326 IAC 2-8-5(1)]

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1. EMISSIONS UNIT OPERATION CONDITIONS - PAINT BOOTHS ..... 22**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.2 Hazardous Air Pollutants (HAPs) Limitations
- D.1.3 Particulate Matter (PM) [6-3-2(d)]
- D.1.4 Preventative Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.5 Volatile Organic Compounds (VOCs) [8-1-2][8-1-4]
- D.1.6 Hazardous Air Pollutants (HAPs)

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

- D.1.7 Record Keeping Requirements
- D.1.8 Reporting Requirements

**D.2. EMISSIONS UNIT OPERATION CONDITIONS - POLISHING OPERATION ..... 24**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.2.1 Particulate Matter (PM)
- D.2.2 Preventative Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.2.3 Particulate Control

Certification Form ..... 25  
Emergency Occurrence Form ..... 26  
FESOP Usage Report Form ..... 28  
Semi-Annual Report Form ..... 30  
Semi-Annual Deviation and Compliance Monitoring Report Form ..... 31

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary orthopaedic appliances manufacturing source.

Source Address:	700 Orthopaedic Drive, Warsaw, Indiana 46581-0988
Mailing Address:	700 Orthopaedic Drive, Warsaw, IN 46581-0988
General Source Phone Number:	(574) 372-7434
SIC Code:	3842
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Three (3) paint booths, identified as SB1, SB2 and SB3, installed in 1985, 1987, and 1987 respectively, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for overspray control and exhausting to stacks E89, E90, and E102, respectively.
- (b) Three (3) paint booths, identified as SB4, SB5, and SB6, installed in 2002, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for overspray control and exhausting to stacks E011, E91 and E103, respectively.
- (c) One (1) polishing operation, consisting of 40 polishing jacks, installed between 1981 and 1998, each with a maximum throughput of 10 pieces per hour, using wet dust collectors 00222 and 00266 for PM control, and exhausting through stacks WDC1 and WDC2.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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This stationary source does not currently have any specifically regulated insignificant activities.

### A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

- 
- (a) This permit, F085-24607-00048, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Enforceability [326 IAC 2-8-6]**

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Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5 Severability [326 IAC 2-8-4(4)]**

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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This permit does not convey any property rights of any sort or any exclusive privilege.

### **B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
    - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Semi-Annual Deviation and Compliance Monitoring Report.

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F085-24607-00048 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

using the attached Semi-Annual Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Semi-Annual Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]**

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- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

**B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

#### C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.3 Opacity [326 IAC 5-1]

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, 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.

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.6 Fugitive Dust Emissions [326 IAC 6-4]**

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue

MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## **Compliance Requirements [326 IAC 2-1.1-11]**

### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### **C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

### **Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

#### **C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

#### **C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

#### **C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Semi-Annual Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Semi-Annual Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS - PAINT BOOTHS

### Emissions Unit Description:

- (a) Three (3) paint booths, identified as SB1, SB2 and SB3, installed in 1985, 1987, and 1987 respectively, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for overspray control and exhausting to stacks E89, E90, and E102, respectively.
- (b) Three (3) paint booths, identified as SB4, SB5, and SB6, installed in 2002, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for overspray control and exhausting to stacks E011, E91 and E103, respectively.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Paint booths SB4, SB5 and SB6 shall each use less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents and cleaning solvents. Compliance with this limit renders the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.

#### D.1.2 Hazardous Air Pollutants (HAPs) Limitations

- (a) The individual hazardous air pollutants (HAPs) delivered to the coating applicators in Paint Booths SB1, SB2, SB3, SB4, SB5, and SB6 shall be limited such that emissions of each individual HAP from the entire source shall be less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The combination of HAPs delivered to the coating applicators in Paint Booths SB1, SB2, SB3, SB4, SB5, and SB6 shall be limited such that HAPs emissions from all paint booths shall be less than 24.16 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, when combined with 0.84 tons per year of potential HAP emissions from insignificant activities, will limit source-wide HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with this condition renders the requirements of 40 CFR 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) not applicable.

#### D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the paint booths shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the paint booth facilities and their control devices.

## Compliance Determination Requirements

### D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

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Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

### D.1.6 Hazardous Air Pollutants

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Compliance with the HAPs usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

## Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

### D.1.7 Record Keeping Requirements

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(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as indicated below and shall be complete and sufficient to establish compliance with the VOC usage limit in Condition D.1.1(a), the requirement in Condition D.1.1(b), and the HAPs limitations in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount of VOC and HAPs in each coating material and solvent used.
  - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (2) The cleanup solvent usage for each day for Paint Booths SB4, SB5 and SB6;
- (3) The total VOC usage for each day for Paint Booths SB4, SB5 and SB6;
- (4) The total VOC usage for each month for Paint Booths SB1, SB2 and SB3;
- (5) The individual HAP usage and total HAP usage for each month for Paint Booths SB1, SB2, SB3, SB4, SB5 and SB6;
- (6) The individual HAP usage and total HAP usage for each twelve (12) consecutive month period for Paint Booths SB1, SB2, SB3, SB4, SB5 and SB6; and
- (7) The weight of VOCs, individual HAPs and total HAPs emitted for each compliance period.

### D.1.8 Reporting Requirements

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A semi-annual summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS - POLISHING OPERATION

### Emissions Unit Description:

- (c) One (1) polishing operation, consisting of 40 polishing jacks, installed between 1981 and 1998, each with a maximum throughput of 10 pieces per hour, using wet dust collectors 00222 and 00266 for PM control, and exhausting through stacks WDC1 and WDC2.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the total allowable particulate emission rate from the polishing operations shall not exceed 1.30 pounds per hour when operating at a total process weight of 360 pounds per hour.

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

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

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the polishing operation and its control devices.

### Compliance Determination Requirements

#### D.2.3 Particulate Control

In order to comply with Condition D.2.1, the wet dust collectors for particulate control shall be in operation and control emissions from the polishing operations at all times that the polishing operations are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: DePuy Orthopaedics, Inc.  
Source Address: 700 Orthopaedic Drive, Warsaw, Indiana 46581-0988  
Mailing Address: 700 Orthopaedic Drive, Warsaw, IN 46581-0988  
FESOP Permit No.: F085-24607-00048

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)\_\_\_\_\_
- Report (specify)\_\_\_\_\_
- Notification (specify)\_\_\_\_\_
- Affidavit (specify)\_\_\_\_\_
- Other (specify)\_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: DePuy Orthopaedics, Inc.  
Source Address: 700 Orthopaedic Drive, Warsaw, Indiana 46581-0988  
Mailing Address: 700 Orthopaedic Drive, Warsaw, IN 46581-0988  
FESOP Permit No.: F085-24607-00048

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### FESOP Usage Report (Submit Report Semi-Annually)

Source Name: DePuy Orthopaedics, Inc.  
 Source Address: 700 Orthopaedic Drive, Warsaw, Indiana 46581-0988  
 Mailing Address: 700 Orthopaedic Drive, Warsaw, IN 46581-0988  
 FESOP Permit No.: F085-24607-00048  
 Facility: SB4, SB5, SB6  
 Parameter: VOC  
 Limit: Less than 15 pounds VOC per day per booth

For each semi-annual reporting period, submit six monthly reports (one per month).

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

Day	Booth	VOC (lbs/day)	Day	Booth	VOC (lbs/day)
1	SB4		17	SB4	
	SB5			SB5	
	SB6			SB6	
2	SB4		18	SB4	
	SB5			SB5	
	SB6			SB6	
3	SB4		19	SB4	
	SB5			SB5	
	SB6			SB6	
4	SB4		20	SB4	
	SB5			SB5	
	SB6			SB6	
5	SB4		21	SB4	
	SB5			SB5	
	SB6			SB6	
6	SB4		22	SB4	
	SB5			SB5	
	SB6			SB6	
7	SB4		23	SB4	
	SB5			SB5	
	SB6			SB6	
8	SB4		24	SB4	
	SB5			SB5	
	SB6			SB6	
9	SB4		25	SB4	
	SB5			SB5	
	SB6			SB6	
10	SB4		26	SB4	
	SB5			SB5	
	SB6			SB6	
11	SB4		27	SB4	
	SB5			SB5	
	SB6			SB6	

<b>12</b>	SB4		<b>28</b>	SB4	
	SB5			SB5	
	SB6			SB6	
<b>13</b>	SB4		<b>29</b>	SB4	
	SB5			SB5	
	SB6			SB6	
<b>14</b>	SB4		<b>30</b>	SB4	
	SB5			SB5	
	SB6			SB6	
<b>15</b>	SB4		<b>31</b>	SB4	
	SB5			SB5	
	SB6			SB6	
<b>16</b>	SB4				
	SB5				
	SB6				

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### FESOP Semi-Annual Report

Source Name: DePuy Orthopaedics, Inc.  
 Source Address: 700 Orthopaedic Drive, Warsaw, Indiana 46581-0988  
 Mailing Address: 700 Orthopaedic Drive, Warsaw, IN 46581-0988  
 FESOP Permit No.: F085-24607-00048  
 Facility: Paint Booths SB1, SB2, SB3, SB4, SB5, and SB6  
 Parameter: HAPs usage.  
 Limit: Less than 10 tons per consecutive 12-month period of any individual HAP.  
 Less than 24.16 tons per consecutive 12-month period of any combination of HAPs.  
 Compliance shall be determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Combination of HAPs (tons)	Combination of HAPs (tons)	Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

Month	Combination of HAPs (tons)	Combination of HAPs (tons)	Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 SEMI-ANNUAL DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: DePuy Orthopaedics, Inc.  
 Source Address: 700 Orthopaedic Drive, Warsaw, Indiana 46581-0988  
 Mailing Address: 700 Orthopaedic Drive, Warsaw, IN 46581-0988  
 FESOP Permit No.: F085-24607-00048

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

<p>This report shall be submitted semi-annually based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management**  
Office of Air Quality

Addendum to the Technical Support Document for a Federally Enforceable State  
Operating Permit

**Source Background and Description**

**Source Name:** DePuy Orthopaedics, Inc.  
**Source Location:** 700 Orthopaedic Drive, Warsaw, Indiana 46581-0988  
**County:** Kosciusko  
**SIC Code:** 3842  
**Permit No.:** F085-24607-00048  
**Permit Reviewer:** Summer Keown

On January 11, 2008, the Office of Air Quality (OAQ) sent a Public Notice to the Times Union stating that DePuy Orthopaedics, Inc had applied for a Federally Enforceable State Operating Permit to operate an orthopaedic appliances manufacturing source. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit for this operation and provided information on how the public could review the proposed Federally Enforceable State Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Federally Enforceable State Operating Permit should be issued as proposed.

On February 4, 2008, on behalf of DePuy Orthopaedics, Inc, Steve Schroedl submitted comments on the proposed Federally Enforceable State Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

**Comment 1:**

Section D.1.8(a) states "...in accordance with (1) through (7) below." Review of the text shows the section only contains (1) through (4). In the facility's current Title V permit, the missing sections 5, 6, and 7 describe the HAP usage required to be reported as part of the quarterly report. Since the reporting requirements for HAPs are included in the draft FESOP as a required report (see page 30 of the draft FESOP), it would be consistent if the required information were included in section D.1.8.

**D.1.8 Record Keeping Requirements**

---

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as indicated below and shall be complete and sufficient to establish compliance with the VOC usage limit in Condition D.1.1(a), the requirement in Condition D.1.1(b), and the HAPs limitations in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount of VOC and HAPs in each coating material and solvent used.
  - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (2) The cleanup solvent usage for each day for Paint Booths SB4, SB5 and SB6;

- (3) The total VOC usage for each day for Paint Booths SB4, SB5 and SB6; and
- (4) The total VOC usage for each month for Paint Booths SB1, SB2 and SB3;

**Response 1:**

The following has been added to D.1.8 on page 23 of the permit:

**D.1.8 Record Keeping Requirements**

---

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as indicated below and shall be complete and sufficient to establish compliance with the VOC usage limit in Condition D.1.1(a), the requirement in Condition D.1.1(b), and the HAPs limitations in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The amount of VOC and HAPs in each coating material and solvent used.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (2) The cleanup solvent usage for each day for Paint Booths SB4, SB5 and SB6;
  - (3) The total VOC usage for each day for Paint Booths SB4, SB5 and SB6;
  - (4) The total VOC usage for each month for Paint Booths SB1, SB2 and SB3;
  - (5) **The individual HAP usage and total HAP usage for each month for Paint Booths SB1, SB2, SB3, SB4, SB5 and SB6;**
  - (6) **The individual HAP usage and total HAP usage for each twelve (12) consecutive month period for Paint Booths SB1, SB2, SB3, SB4, SB5 and SB6; and**
  - (7) **The weight of VOCs, individual HAPs and total HAPs emitted for each compliance period.**

**Comment 2:**

The numbering scheme for Section D is missing D.1.7.

**D.1.6 Hazardous Air Pollutants**

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Compliance with the HAPs usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**D.1.8 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as indicated below and shall be complete and sufficient to establish

compliance with the VOC usage limit in Condition D.1.1(a), the requirement in Condition D.1.1(b), and the HAPs limitations in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

**Response 2:**

The following changes have been made to Condition D.1.7, page 23 of the permit:

**D.1.6 Hazardous Air Pollutants**

---

Compliance with the HAPs usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**D.4.81.7 Record Keeping Requirements**

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(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as indicated below and shall be complete and sufficient to establish compliance with the VOC usage limit in Condition D.1.1(a), the requirement in Condition D.1.1(b), and the HAPs limitations in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount of VOC and HAPs in each coating material and solvent used.
  - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (2) The cleanup solvent usage for each day for Paint Booths SB4, SB5 and SB6;
- (3) The total VOC usage for each day for Paint Booths SB4, SB5 and SB6;
- (4) The total VOC usage for each month for Paint Booths SB1, SB2 and SB3;
- (5) The individual HAP usage and total HAP usage for each month for Paint Booths SB1, SB2, SB3, SB4, SB5 and SB6;
- (6) The individual HAP usage and total HAP usage for each twelve (12) consecutive month period for Paint Booths SB1, SB2, SB3, SB4, SB5 and SB6; and
- (7) The weight of VOCs, individual HAPs and total HAPs emitted for each compliance period.

**D.4.7 1.8 Reporting Requirements**

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A semi-annual summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Indiana Department of Environmental Management**  
**Office of Air Quality**  
**and Northern Regional Office**

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit

**Source Background and Description**

<b>Source Name:</b>	<b>DePuy Orthopaedics, Inc.</b>
<b>Source Location:</b>	<b>700 Orthopaedic Drive, Warsaw, Indiana 46581-0988</b>
<b>County:</b>	<b>Kosciusko</b>
<b>SIC Code:</b>	<b>3842</b>
<b>Permit Renewal No.:</b>	<b>F 085-24607-00048</b>
<b>Permit Reviewer:</b>	<b>Summer Keown</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from DePuy Orthopaedics, Inc. relating to the operation of a stationary orthopaedic appliances manufacturing source.

**History**

On March 12, 2007, DePuy Orthopaedics, Inc. submitted applications to the OAQ requesting to renew its operating permit and to convert their Part 70 Operating Permit (T 085-15832-00048) to a FESOP permit (F 085-24607-00048). DePuy Orthopaedics, Inc. has agreed to limit its Hazardous Air Pollutants (HAPs) emissions to less than 10 tons per year for a single HAP and less than 25 tons per year for total HAPs. As a result, potential emissions from all criteria pollutants from the source will be at less than Title V levels, therefore the source will be issued a FESOP. DePuy Orthopaedics, Inc. was issued a Part 70 Operating Permit on September 5, 2003.

**Permitted Emission Units and Pollution Control Equipment**

- (a) Three (3) paint booths, identified as SB1, SB2 and SB3, installed in 1985, 1987, and 1987, respectively, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for overspray control and exhausting to stacks E89, E90, and E102, respectively.
- (b) Three (3) paint booths, identified as SB4, SB5, and SB6, installed in 2002, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for overspray control and exhausting to stacks E011, E91 and E103, respectively.
- (c) One (1) polishing operation, consisting of 40 polishing jacks, installed between 1981 and 1998, each with a maximum throughput of 10 pieces per hour, using wet dust collectors, identified as 00222 and 00266, for PM control, and exhausting through stacks WDC1 and WDC2.

**Insignificant Activities**

- (a) Activities with emissions equal to or less than the following thresholds: 5.0 tons per year PM or PM10, 10 tons per year SO<sub>2</sub>, NO<sub>x</sub>, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:

- (1) One (1) Zyglo dipping process, identified as emission unit 85106, installed in 2000, with a total maximum capacity of 100 units per hour and exhausting to stack HEF19.
  - (2) One (1) Dip Seal process, identified as emission unit 72043, installed in 1993, with a maximum capacity of 100 units per hour and exhausting to stack HEF29B.
  - (3) One (1) SIS Cleaning Process, identified as emission unit E75, installed in 1998, with a maximum solvent throughput of 0.045 tons per year and venting internally.
  - (4) One (1) Acetic Acid Sterilizing process, identified as emission unit E121, installed in 1995, with a maximum solvent throughput of 0.44 tons per year and exhausting to stack HEF60.
  - (5) One (1) isopropyl acid wipe-down process, installed in 1980, with a maximum solvent throughput of 0.8 tons per year and venting internally.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) ultrasonic, water-based, detergent cleaner/degreasers, identified as emission units 86105/86106, 85105, 85106 and 83122, installed in 1992, 1997, 2000 and 1994, respectively.
  - (c) Liquefied petroleum gas-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour: three liquefied petroleum gas fired fork lift trucks rated at 48, 49 and 90 HP, respectively.
  - (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: 28 natural gas rooftop heaters, consisting of Roof Top Heaters ID numbers 1-21, E18, E19, E22-E24, E51, E54, E55, and E65-E67, with individual heat input capacities ranging from 0.08 to 0.225 MMBtu/hr and an aggregate heat input capacity of 17.2 MMBtu/hr.
  - (e) Emergency generators as follows: diesel generators not exceeding 1600 horsepower: Two (2) 328 hp generators.
  - (f) A stationary fire pump.

#### **Emission Units and Pollution Control Equipment Removed From the Source**

- (a) Surface Coating Booth SB7 was permitted but was never installed. The source has determined that SB7 will not be installed and requests that it be removed from the permit. All conditions related to Surface Coating Booth SB7 have been removed from the permit.
- (b) Insignificant activity Zyglo dipping process emission unit 85105, installed in 1997, has been removed from the source. It has been removed from the permit.

#### **Existing Approvals**

Since the issuance of the Part 70 Operating Permit (T 085-15832-00048 on September 5, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Minor Source Modification No. 085-18246-00048, issued on April 15, 2004;
- (b) Significant Permit Modification No. 085-18499-00048, issued on February 20, 2004;
- (c) Significant Permit Modification No. 085-23363-00048, issued on December 11, 2006; and

- (d) Review Request No. 085-24120-00048, issued on March 14, 2007.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP:

- (a) All Part 70 Operating Permit conditions.

Reason not incorporated: The source transitioned to a FESOP; therefore, the Part 70 Operating Permit conditions are no longer applicable.

- (b) Conditions relating to Surface Coating Booth SB7.

Reason not incorporated: The source has requested that Surface Coating Booth SB7 be removed from the permit as it was never installed. Therefore Section D.4 and all other limits and conditions referring to Surface Coating Booth SB7 have been removed from this permit.

- (c) This source is a participant in the Environmental Stewardship Program. As such, the source is able to extend their FESOP term from five years to ten years. They are also able to reduce the frequency of their reporting from quarterly to semi-annually. Permit conditions B.2, B.15, C.17, D.19 and all other permit conditions related to permit term length and reporting frequency have been adjusted to reflect these changes.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
E89	SB1	38	18	2000	70
E90	SB2	38	18	2000	70
E102	SB3	38	18	2000	70
E011	SB4	38	18	2000	70
E91	SB5	38	18	2000	70
E103	SB6	38	18	2000	70
WDC1	Polishing Operation	38	24	25000	70
WDC2	Polishing Operation	38	24	25000	70
HEF19	Zyglo dipping process 85106	38	18	25000	70
HEF29B	Dip Seal process 72043	38	18	25000	70
HEF60	Acetic Acid Sterilizing process E121	38	18	25000	70

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in Kosciusko County

Pollutant	Status
PM <sub>10</sub>	attainment
PM <sub>2.5</sub>	attainment
SO <sub>2</sub>	attainment
NOx	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) 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 PM 2.5 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. See the State Rule Applicability – Entire Source section.
- (b) 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 emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) 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 – Entire Source section.
- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (f) 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 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	21.02
PM-10	21.45
SO <sub>2</sub>	0.05

Pollutant	tons/year
VOC	20.17
CO	6.33
NO <sub>x</sub>	7.53

HAPs	tons/year
Toluene	17.38
Diethylene Glycol Butyl Ether	0.70
Methyl Methacrylate	0.08
Total	17.60

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
<b>PM</b>	Not Reported
<b>PM-10</b>	0
<b>SO<sub>2</sub></b>	Not Reported
<b>VOC</b>	8
<b>CO</b>	Not Reported
<b>NO<sub>x</sub></b>	Not Reported
<b>HAPs</b>	Not Reported

**Potential to Emit After Issuance**

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						HAPs
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	
Surface Coating Booths	0.43	0.43	0.00	17.77	0.00	0.00	<10 tons single HAP <25 tons total HAPs
Polishing Operations	20.45	20.45	0.00	0.00	0.00	0.00	0.00
Insignificant Heaters	0.14	0.57	0.05	0.41	6.33	7.53	0.14
Degreasing Operations	0.00	0.00	0.00	0.70	0.00	0.00	0.70
Cleaning/Sterilizing Operations	0.00	0.00	0.00	1.29	0.0	0.00	0.00
Total Emissions	21.02	21.45	0.05	20.17	6.33	7.53	<10 tons single HAP <25 tons total HAPs

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) 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.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for MMMM (Miscellaneous Metal Parts and Products Surface Coating).
  - (1) The individual hazardous air pollutants (HAPs) delivered to the coating applicators in Paint Booths SB1, SB2, SB3, SB4, SB5 and SB6 shall be limited such that emissions of each individual HAP from the entire source shall be less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
  - (2) The combination of HAPs delivered to the coating applicators in Paint Booths SB1, SB2, SB3, SB4, SB5 and SB6 shall be limited such that HAPs emissions from all paint booths shall be less than 24.16 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, when combined with 0.84 tons per year of potential HAP emissions from insignificant activities, will limit source-wide HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with these conditions renders the requirements of 40 CFR 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) not applicable.

- (c) This source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring (CAM). In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and, 3) the unit has potential pre-control device emissions of the applicable regulated air pollutant that are

equal or greater than 100 percent of the amount required for a source to be classified as a major source. Additionally, the source has to receive a Part 70 permit. This source is receiving a FESOP and is therefore not subject to 40 CFR 64, CAM.

### **State Rule Applicability - Entire Source**

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

This source was originally constructed in 1976 and is not one of the twenty-eight (28) listed sources. The total source potential to emission of all criteria pollutants are less than two hundred and fifty (250) tons per year. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration) is not applicable.

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

The operation of the six paint booths, identified as SB1, SB2, SB3, SB4, SB5, and SB6, has the potential to emit greater than ten (10) tons per year of a single HAP. However, the source has agreed to limit HAPs usage to less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of total HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. Therefore, the next emission statement for this source must be submitted by July 1, 2010. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

#### **326 IAC 2-8 (FESOP)**

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions shall apply:

The total input usage of any single HAP, and total HAPs delivered to paint booths SB1, SB2, SB3, SB4, SB5, and SB6, and the degreasing operations shall be limited to less than 10 tons and 25 tons, respectively, per twelve (12) consecutive month period with compliance determined at the end of each month.

#### **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 Exemptions), 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 6-4 (Fugitive Dust Emissions)**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

This source is not subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because the source does not have fugitive emissions exceeding twenty-five (25) tons per year.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

This source was constructed after October 7, 1974 and prior to January 1, 1980. However, it has the potential to emit less than 100 tons per year of VOC. Therefore, 326 IAC 8-6 (Organic Solvent Emission Limitations) is not applicable.

**State Rule Applicability – Paint Booths**

**326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)**

Pursuant to 326 IAC 6-3-2(d)(4), surface coating manufacturing processes that use less than five (5) gallons of coating per day are exempted from from this rule.

If the coating application rate increases to five (5.0) gallons or greater per day, the surface coating booths, identified as SB1, SB2, SB3, SB4, SB5, and SB6, must be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. The source must inform the Office of Air Quality that usage has increased. Increased usage may require a permit modification.

Any change or modification which may increase the VOC potential to emit of paint booths SB1, SB2 or SB3 to 25 tons or more, per booth, shall require prior approval by the IDEM, OAQ before such changes may take place.

**326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**

Paint booths SB1, SB2, SB3, SB4, SB5 and SB6 were constructed after January 1, 1980 and are paired up to comprise three separate coating processes. Each pair of booths operates independently of other booths and has the potential to emit less than 25 tons per year of VOC. Therefore, the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) are not applicable.

**326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)**

(a) Paint booths SB4, SB5 and SB6 were constructed after July 1, 1990, are located in Kosciusko County and have the potential to emit VOC greater than fifteen (15) pounds per day. However, in order to render the requirements of 326 IAC 8-2-9 not applicable, paint booths SB4, SB5 and SB6 shall each use less than fifteen (15) pounds of VOC per day. Compliance with this limit will ensure that actual VOC emissions from each booth do not exceed 15 pounds per day and renders the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.

(b) Paint booths SB1, SB2 and SB3 were each constructed after November 1, 1980, are located in Kosciusko County and each have a potential to emit less than twenty-five (25) tons of VOC per year. Therefore, paint booths SB1, SB2 and SB3 are not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). However, any change or modification which may increase the VOC potential to emit of paint booths SB1, SB2, or SB3 to 25 tons per year or more, per booth, shall require prior approval by the IDEM, OAQ before such changes may take place.

**State Rule Applicability – Polishing Operations**

**326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)**

Pursuant to 326 IAC 6-3-2(e), the particulate from the polishing operation 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 wet dust collectors, identified as 00222 and 00266, shall be in operation at all times the polishing operation is in operation, in order to comply with this limit.

### **Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no applicable compliance monitoring requirements applicable to this source.

- (a) Compliance monitoring is not required for the paint booths, identified as SB1, SB2, SB3, SB4, SB5 and SB6 because each booth uses less than five (5) gallons of coating per day and has a potential to emit less than fifteen (15) pounds of VOC per day.
- (b) Compliance monitoring is not required for the polishing operation because the operation is controlled by wet collectors and has allowable PM emissions (pursuant to 326 IAC 6-3-2) of less than 10 pounds per hour.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP 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 April 12, 2007.

### **Conclusion**

The operation of this stationary orthopaedic appliances manufacturing source shall be subject to the conditions of the attached FESOP No. F 085-24607-00048.

**Appendix A: Emission Calculations**

Company Name: DePuy Orthopaedics, Inc.  
Source Location: 700 Orthopaedic Drive, Warsaw, IN 46581-0988  
Permit Number: F 085-24607-00048  
Reviewer: Summer Keown  
Date: November 13, 2007

**Uncontrolled Potential Emissions (tons/year)**

Emissions Generating Activity						
Pollutant	Surface Coating Booths	Polishing Operations	Insignificant Heaters	Degreasing Operations	Cleaning/Sterilizing Operations	TOTAL
PM	0.43	20.45	0.14	0.00	0.00	21.02
PM10	0.43	20.45	0.57	0.00	0.00	21.45
SO2	0.00	0.00	0.05	0.00	0.00	0.05
NOx	0.00	0.00	7.53	0.00	0.00	7.53
VOC	17.77	0.00	0.41	0.70	1.29	20.17
CO	0.00	0.00	6.33	0.00	0.00	6.33
total HAPs	17.46	0.00	0.14	0.70	0.00	18.30
worst case single HAP	17.38	0.00	0.14	0.00	0.00	

(toluene)

(hexane)

Total emissions based on rated capacity at 8,760 hours/year.

**Controlled / Limited Potential Emissions (tons/year)**

Emissions Generating Activity						
Pollutant	Surface Coating Booths	Polishing Operations	Insignificant Heaters	Degreasing Operations	Cleaning/Sterilizing Operations	TOTAL
PM	0.43	20.45	0.14	0.00	0.00	21.02
PM10	0.43	20.45	0.57	0.00	0.00	21.45
SO2	0.00	0.00	0.05	0.00	0.00	0.05
NOx	0.00	0.00	7.53	0.00	0.00	7.53
VOC	17.77	0.00	0.41	0.70	1.29	20.17
CO	0.00	0.00	6.33	0.00	0.00	6.33
total HAPs	17.46	0.00	0.14	0.70	0.00	<10 tons individual HAP <25 tons total HAPs
worst case single HAP	17.38	0.00	0.14	0.00	0.00	

(toluene)

(hexane)

Total emissions based on rated capacity at 8,760 hours/year, after control.



**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

**Company Name:** DePuy Orthopaedics, Inc.  
**177 Orthopaedic Drive, Warsaw, IN 46581-0988**  
**Permit Number:** F 085-24607-00048  
**Plt ID:** 085-00048  
**Permit Reviewer:** Summer Keown  
**Date:** November 13, 2007

Unit	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Methyl Methacrylate	Weight % Diethylene Glycol Butyl Ethe	Toluene Emissions (ton/yr)	Methyl Methacrylate Emissions (ton/yr)	Diethylene Glycol Butyl Ether Emissions (ton/yr)
SB1	Toluene	7.3	0.65000	0.125	99.50%	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
SB2	Toluene	7.3	0.65000	0.125	99.50%	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
SB3	Toluene	7.3	0.65000	0.125	99.50%	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
SB4	Toluene	7.3	0.65000	0.125	99.50%	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
SB5	Toluene	7.3	0.65000	0.125	99.50%	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
SB6	Toluene	7.3	0.65000	0.125	99.50%	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
<b>Sum for Surface Coating Booths:</b>								<b>17.38</b>	<b>0.08</b>	<b>0.00</b>
<b>Total HAPs for Surface Coating Booths:</b>										<b>17.46</b>
Degreaser	Oakite	8.5	0.062500	3.00	0.00%	0.00%	10.00%	0.00	0.00	0.70

Total State Potential Emissions **Sum for Degreasing Operations: 0.00 0.00 0.70**  
**Total HAPs for Degreasing Operations: 0.70**

**METHODOLOGY**

**Total HAPs for Surface Coating and Degreasing Operations: 18.15**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: DePuy Orthopaedics, Inc.  
Address City IN Zip: 700 Orthopaedic Drive, Warsaw, IN 46581-0988  
Permit Number: F 085-24607-00048  
Plt ID: 085-00048  
Reviewer: Summer Keown  
Date: November 13, 2007**

Heat Input Capacity  
MMBtu/hr\*

Potential Throughput  
MMCF/yr

17.2

150.67

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10**	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 ***see below	5.5	84.0
Potential Emission in tons/yr	0.14	0.57	0.05	7.53	0.41	6.33

\*17.2 MMBtu is a combination of the insignificant heating units

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

\*\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 6 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name:** DePuy Orthopaedics, Inc.  
**Address City IN Zip:** 700 Orthopaedic Drive, Warsaw, IN 46581-0988  
**Permit Number:** F 085-24607-00048  
**Pit ID:** 085-00048  
**Reviewer:** Summer Keown  
**Date:** November 13, 2007

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.582E-04	9.040E-05	5.650E-03	1.356E-01	2.561E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.767E-05	8.287E-05	1.055E-04	2.863E-05	1.582E-04

Methodology is the same as page 5.

**Total HAPs: 0.14**

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: DePuy Orthopaedics, Inc.  
Address City IN Zip: 700 Orthopaedic Drive, Warsaw, IN 46581-0988  
Permit Number: F 085-24607-00048  
Plt ID: 085-00048  
Reviewer: Summer Keown  
Date: November 13, 2007**

**Polishing Operations:**

The polishing operations are controlled with two wet dust collectors (WDC 1 and WDC 2)

Amount of PM collected: 37 pounds per day  
Hours of operation: 8 hours per day  
Estimated control efficiency: 99%

Uncontrolled PM PTE:  $(37 \text{ lb}/8 \text{ hr} * 1/.99 * 8760 \text{ hr/yr} * 1 \text{ ton}/2000 \text{ lbs} = \mathbf{20.45 \text{ ton/yr}}$   
Controlled PTE:  $20.45 \text{ ton/yr} * (1 - 0.99) = \mathbf{0.2045 \text{ ton/yr}}$

**Cleaning/Sterilizing Operations: Insignificant Activities**

Unit	Material	Total Use (ton/yr)	VOC PTE (ton/yr)
IPA Clean	Isopropyl Alchoh	0.8	0.8
Sterilize	Acetic Acid	0.44	0.44
SIS Clean	Ethanol	0.05	0.05
<b>Total:</b>			<b>1.29</b>

As a worst case estimate, it is assumed that 100% of the VOC used will be emitted.

Calculations for cleaning/sterilizing operations are taken from CP/MSOP 085-13979-00048, issued 6/28/01.