



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: March 27, 2008
RE: Symmetry Medical / 085-26177-00059
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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100 North Senate Avenue
Indianapolis, Indiana 46204
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Mr. Jack Buchalco, Senior Plant Engineer
Symmetry Medical USA, Inc.
486 West 350 North
Warsaw, IN 46582

March 27, 2008

Re: Registration Notice-Only Change
No. 085-26177-00059

Dear Jack Buchalco:

Symmetry Medical USA, Inc. was issued a Registration No. 085-19142-00059 on September 24, 2004 for a stationary manufacturer of medical instruments and surgical appliances & supplies located at 486 West 350 North, Warsaw, IN 46582. On February 26, 2008, the Office of Air Quality (OAQ) received a Registration Annual Notification with a name change for the Responsible Official.

In addition, IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual (AI) in registrations. However, IDEM will continue to update the AI in the database. Pursuant to 326 IAC 2-5.5-6, the registration is hereby revised as follows, with deleted language as ~~strikeouts~~ and new language **bolded**:

~~Responsible Official: Jerry Auer~~

The source shall continue to operate according to 326 IAC 2-5.5. Please find enclosed the revised registration. A copy of the registration is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Christina Lowry, at (800) 451-6027, press 0 and ask for Christina Lowry or extension 4-5176, or dial (317) 234-5176.

Original signed by,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/ctl

Attachment: Revised Registration

cc: File - Kosciusko County
Kosciusko County Health Department
Air Compliance Section
IDEM Northern Regional Office
Compliance Data Section
Permits Administrative and Development
Billing, Licensing and Training Section



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REGISTRATION OFFICE OF AIR QUALITY

Symmetry Medical USA, Inc
486 West 350 North
Warsaw, IN 46582

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

| | |
|--|-----------------------------------|
| Registration No. 085-19142-00059 | |
| Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality | Issuance Date: September 24, 2004 |

First Registration Notice-Only Change No. 085-21029-00059, issued on April 7, 2005.
First Registration Revision No. 085-23056, issued on July 27, 2006.
Second Registration Notice-Only Change No. 085-24036-00059, issued on December 15, 2006.

| | |
|--|-------------------------------|
| Third Registration Notice-Only Change No. 085-26177-00059 | |
| Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality | Issuance Date: March 27, 2008 |

SECTION A

SOURCE SUMMARY

This registration 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary manufacturer of medical instruments and surgical appliances & supplies.

| | |
|------------------------------|--|
| Source Address: | 486 West 350 North, Warsaw, IN 46582 |
| Mailing Address: | 486 West 350 North, Warsaw, IN 46582 |
| General Source Phone Number: | (574) 267-8700 |
| SIC Code: | 3841 |
| County Location: | Kosciusko County |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Registration |

A.2 Emission Units and Pollution Control Equipment Summary

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

The following emission units at the North Street Plant:

(a) One (1) metal fabrication process, with a maximum throughput rate of 200 lbs/hr, consisting of the following:

- (1) Eight (8) grinders.
- (2) Thirty-five (35) CNC lathes.
- (3) Forty-seven (47) milling machines.
- (4) Two (2) electrical discharge machines (EDMs).
- (5) Cutting and grinding instruments.
- (6) One (1) metal inert gas (MIG) welding station, with a maximum wire consumption rate of 0.05 lbs/hr, controlled by a Torit dust collector.
- (7) Four (4) tungsten inert gas (TIG) stations, each with a maximum wire consumption rate less than 625 lbs/day.
- (8) Two (2) oxyacetylene stations, each with a maximum cutting rate of less than 3,400 inches per hour of stock with one (1) inch thickness.
- (9) Six (6) TIG stations, each with a maximum metal consumption of 2.43 lbs/hr.
- (10) Six (6) CNC vertical machining centers.
- (11) Four (4) DEM rams.

(b) One (1) polishing process, including forty-two (42) polishing stations, identified as PJC-01 through PJC-42, with a total throughput rate of 200 lbs/hr, each controlled by a dust collector.

(c) Nineteen (19) natural gas fired heaters, including the following:

(1) One (1) natural gas fired heater, identified as H-1, with a maximum heat input capacity of 0.8 MMBtu/hr.

(2) One (1) natural gas fired heater, identified as H-2, with a maximum heat input capacity of 0.17 MMBtu/hr.

(3) Two (2) natural gas fired heaters, identified as H-3 and H-4, each with a maximum heat input capacity of 0.1 MMBtu/hr.

(4) One (1) natural gas fired heater, identified as H-5, with a maximum heat input capacity of 0.08 MMBtu/hr.

(5) One (1) natural gas fired heater, identified as H-6, with a maximum heat input capacity of 0.15 MMBtu/hr.

(6) One (1) natural gas fired heater, identified as H-7, with a maximum heat input capacity of 0.154 MMBtu/hr.

(7) One (1) natural gas fired heater, identified as HVAC#1, with a maximum heat input capacity of 1.2 MMBtu/hr.

(8) One (1) natural gas fired heater, identified as HVAC#2, with a maximum heat input capacity of 0.6 MMBtu/hr.

(9) One (1) natural gas fired heater, identified as HVAC#3, with a maximum heat input capacity of 0.8 MMBtu/hr.

(10) One (1) natural gas fired heater, identified as HVAC#4, with a maximum heat input capacity of 1.5 MMBtu/hr.

(11) One (1) natural gas fired heater, identified as HVAC#5, with a maximum heat input capacity of 0.5 MMBtu/hr.

(12) One (1) natural gas fired heater, identified as HVAC#6, with a maximum heat input capacity of 0.6 MMBtu/hr.

(13) One (1) natural gas fired heater, identified as HVAC#7, with a maximum heat input capacity of 0.9 MMBtu/hr.

(14) Two (2) natural gas fired heaters, identified as HVAC#8 and HVAC#9, each with a maximum heat input capacity of 0.188 MMBtu/hr.

(15) Two (2) natural gas fired heaters, identified as HVAC#10 and HVAC#11, each with a maximum heat input capacity of 0.388 MMBtu/hr.

(16) One (1) natural gas fired heater, identified as ID48, with a maximum heat input capacity of 0.049 MMBtu/hr.

The following emission units at the Boeing Plant:

(a) One (1) machining and milling process, constructed in 2004, with a maximum throughput rate of 181 lbs/hr, consisting of the following:

- (1) One (1) CNC grinder.
- (2) Four (4) CNC lathes.
- (3) Four (4) CNC vertical machining centers.
- (4) Three (3) electrical discharge machines (EDM) for wire.
- (5) Four (4) laser cutters.
- (6) Two (2) electric ovens.
- (7) Six (6) standard lathes.
- (8) Eleven (11) vertical mills.
- (9) Four (4) surface grinders.
- (10) Seven (7) hydraulic presses.

(b) One (1) polishing process, constructed in 2004, with a maximum throughput rate of 172 lbs/hr, consisting of the following:

- (1) Eight (8) polishing jacks, identified as D-1 through D-8, each controlled by a dust collector.
- (2) Five (5) shot blasters, identified as SB-1 through SB-5, using glass beads as the blast media, each controlled by a dust collector.

(c) Five (5) parts washers, identified as W1 through W5, constructed in 2004, each with a maximum solvent usage less than 145 gallons per 12 months, using non-halogenated solvents.

(d) One (1) natural gas fired heater, identified as #3107, constructed in 2004, with a maximum heat input capacity of 0.4 MMBtu/hr.

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration 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 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration 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.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM, the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. 085-26177-00059 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 registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 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, IN 46204-2251

- (c) The notification 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.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

SECTION C

SOURCE OPERATION CONDITIONS

| |
|---------------|
| Entire Source |
|---------------|

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 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 registration:

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), Particulate emissions from each of the following processes shall be limited to the pounds per hour limits listed in the table below:

| Process | Max Throughput Rate (lbs/hr) | Particulate Emission Limit (lbs/hr) |
|---|------------------------------|-------------------------------------|
| Metal Fabricating Process at North Street Plant | 200 | 0.88 |
| Polishing Process at North Street Plant | 200 | 0.88 |
| Machining and Milling Process at Boeing Plant | 181 | 0.82 |
| Polishing Process at Boeing Plant | 172 | 0.79 |

The pounds per hour limitations were calculated using the following equation:

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

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

C.3 Organic Solvent Degreasing Operations [326 IAC 8-3]

Pursuant to 326 IAC 8-3-2 (Cold Cleaning Operations), the Permittee shall comply with the following operating requirements for the parts washers (W1 through W5), which will be constructed after January 1, 1980:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;

- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

C.4 Organic Solvent Degreasing Operations [326 IAC 8-3]

Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), the parts washers (W1 through W5) at this source, which will be constructed after July 1, 1990 and do not have remote solvent reservoirs, have the following requirements:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kilopascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 °C) (one hundred degrees Fahrenheit (100 °F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9 °C) (one hundred twenty degrees Fahrenheit (120 °F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

C.5 Organic Solvent Degreasing Operations [326 IAC 8-3]

Pursuant to 326 IAC 8-3-5 (b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

**REGISTRATION
ANNUAL NOTIFICATION**

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

| | |
|--------------------------|----------------------------|
| Company Name: | Symmetry Medical USA, Inc. |
| Address: | 486 West 350 North |
| City: | Warsaw, Indiana 46582 |
| Phone Number: | (574) 267-8700 |
| Registration No.: | 085-19142-00059 |

I hereby certify that Symmetry Medical USA, Inc. is :

- still in operation.
- no longer in operation.

I hereby certify that Symmetry Medical USA, Inc. is :

- in compliance with the requirements of Registration No. 085-19142-00059.
- not in compliance with the requirements of Registration No. 085-19142-00059.

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

| |
|-----------------------|
| Noncompliance: |
| |
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