INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 29, 2008

RE: Symmetry Medical USA, Inc. / 085-26810-00100

FROM: Matthew Stuckey, 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

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REGISTRATION
OFFICE OF AIR QUALITY

Symmetry Medical USA, Inc.
111 North Clay Street
Claypool, Indiana 46510

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. 085-20412-00100	
Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: January 28, 2005

First Registration Revision No. 085-23919-00100, issued on January 10, 2007
First Registration Notice-Only Change No. 085-26176-00100 issued on March 27, 2008

Second Notice-Only Change No. 085-26810-00100	
Issued by:Original signed by Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 29, 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:	111 North Clay Street, Claypool, IN 46510
Mailing Address:	486 West 350 North, Warsaw, IN 46582
General Source Phone Number:	574-371-2211
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:

(a) Three (3) glass bead blasting units, identified as BB-01 through BB-03 and each having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as BBC-01 through BBC-03, for particulate control and exhausting to interior of building;

(b) Nine (9) polishing jacks, identified as PJ-01 through PJ-09 and each having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as PJC-01 through PJC-09, for particulate control and exhausting to interior of building;

(c) One (1) impro-clean parts washer, identified as PW-01, with a maximum solvent usage of less than 145 gallons per twelve (12) month period, using nonhalogenated solvents and exhausting to interior of building;

(d) Vehicular traffic on paved plant roads with maximum capacity of 1,168 vehicle miles traveled per year;

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

(f) Two (2) natural gas fired HVAC units, identified as HVAC-01 and HVAC-02 and each having a capacity of 0.2 MMBtu per hour;

(g) Five (5) natural gas fired HVAC units, identified as HVAC-03 through HVAC-07 and each having a capacity of 0.4 MMBtu per hour;

(h) Seven (7) metal fabrication CNC lathes with no regulated air pollutant emissions.

(i) Thirty-eight (38) metal fabrication CNC mill machines with no regulated air pollutant emissions.

(j) Two (2) metal fabrication cut-off saw stations with no regulated air pollutant emissions.

(k) Three (3) tungsten inert gas (TIG) stations, with a maximum wire consumption rate less than 625 lbs/day.

(l) Twenty-three (23) EDM wire machines, coolant flooded with less than 1% by weight of VOC, with no regulated air pollutant emissions.

(m) Four (4) EDM Rams, coolant flooded with less than 1% by weight of VOC, with no regulated air pollutant emissions.

(n) One (1) laser etching station, with no regulated air pollutant emissions.

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. 085-20412-00100 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).

SECTION D OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

(a) Three (3) glass bead blasting units, identified as BB-01 through BB-03 and each having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as BBC-01 through BBC-03, for particulate control and exhausting to interior of building;

(b) Nine (9) polishing jacks, identified as PJ-01 through PJ-09 and each having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as PJC-01 through PJC-09, for particulate control and exhausting to interior of building;

(c) One (1) impro-clean parts washers, identified as PW-01, with a maximum solvent usage of less than 145 gallons per twelve (12) month period, using nonhalogenated solvents and exhausting to interior of building;

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1 Particulate Emission Limitations for Manufacturing Process [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following units shall not exceed 0.88 pounds per hour when operating at a maximum process weight rate of 200 pounds per hour:

(a) Each of the three (3) glass bead blasting units, identified as BB-01 through BB-03; and

(b) Each of the nine (9) polishing jacks, identified as PJ-01 through PJ-09.

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

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

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

The Permittee shall operate the dust collectors, identified as BBC-01 through BBC-03 (for glass bead blasting units) and PJC-01 through PJC-09 (for polishing jacks), at all times the units are in operation to be in compliance with 326 IAC 6-3-2.

D.2 Volatile Organic Compounds [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, for parts washer (PW-01), the owner or operator shall:

(a) Equip the cleaner with a cover;

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

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the 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.

D.3 Volatile Organic Compoundss [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a), the owner or operator shall ensure that the following control equipment requirements are met for the parts washers (PW-01):

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kilopascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38 ^{o}C) (one hundred degrees Fahrenheit (100 ^{o}F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater that four and three-tenths (4.3) kilopascals (thirty-two (32 millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 ^{o}C) (one hundred degrees Fahrenheit (100 ^{o}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 ^{o}C) (one hundred degrees Fahrenheit (100 ^{o}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9 ^{o}C) (one hundred twenty degrees Fahrenheit (120 ^{o}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

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

(b) Pursuant to 326 IAC 8-3-5(b), the owner or operator shall ensure that the following operating requirements are met for each of the parts washers (W1 through W7):

(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:	111 North Clay Street
City:	Claypool, Indiana 46510
Phone Number:	574-371-2211
Registration No.:	085-26176-00100

I hereby certify that company name is :

☐ still in operation.
☐ no longer in operation.

I hereby certify that company name is :

☐ in compliance with the requirements of Registration No. 085-20412-00100.
☐ not in compliance with the requirements of Registration No. 085-20412-00100.

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:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Notice Only Change to Registration

Source Background and Description

Source Name:	**Symmetry Medical USA, Inc. Claypool**
Source Location:	**111 North Clay Street, Claypool, IN 46510**
County:	**Kosciusko**
SIC Code:	**3842**
Registration No.:	**085-20412-00100**
Notice Only Change No.:	**085-26810-00100**
Permit Reviewer:	**Janet Mobley**

The Office of Air Quality (OAQ) has reviewed an application from Symmetry Medical USA, Inc. Claypool relating to the operation of a stationary stainless steel surgical instrument manufacturing facility.

History

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

On July 28, 2008, the Office of Air Quality (OAQ) received an application from Symmetry Medical USA, Inc. - Claypool Division requesting an administrative amendment to the registration to show recent changes in equipment. In preparing the application, the source discovered that the current registration (085-26176-00100) that was issued on March 27, 2008, did not reflect the changes made in the previous revision. The changes noted in this TSD refer to the revision (085-23919-00100) that was issued January 10, 2007.

IDEM no longer lists the name or title of the Authorized Individual (AI) in registrations, however IDEM will continue to update the AI in the database. Mr. Paul Sparkman, Environmental Management System Rep., is now the authorized individual listed in the database.

Existing Approvals

Since the issuance of Registration Permit No.085-20412-00100 issued on January 28, 2005, the source has been operating under previous approvals including, but not limited to, the following:

(a) Registration Revision No. 085-23919-00100, issued January 10, 2007
(b) Notice Only Change No. 085-26176-00100, issued March 27, 2008

All conditions from previous approvals were incorporated into this permit.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for $PM_{2.5}$.

(a) Ozone Standards
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 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 and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Kosciusko County has been classified as attainment for PM2.5. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD), for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise the PSD rules, 326 IAC 2-2 to inclue those requirements. The May 8, 2008, rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions unitl 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants
Kosciusko County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Proposed Changes of Emission Units and Pollution Control Equipment

The following changes should have been made to (085-26176-00100) that was issued on March 27, 2008, along with the current changes requested by the source. (The currently permitted units refer to Registration Revision 085-23919-00100 that permitted these units).

Glass Bead Blaster with dust collector - currently permitted for four (4) units, and will be reduced to three (3).

Polishing jack with dust collector - currently permitted for ten (10) units, and will be reduced to nine (9).

Parts Washer - currently permitted for two (2) units, and will be reduced to one (1).

CNC Lathe - currently permitted for sixteen (16) machines, and will be reduced to seven (7).

Currently permitted for three (3) cutting/drilling stations - removing one station and the drilling, and renamed as cut-off saw.

The source proposed to add the following units:

One (1) tungsten inert gas (TIG) station, with a maximum wire consumption rate less than 625 lbs/day, no increase in emissions. The source is currently permitted for two (2) units.

Twenty-eight (28) CNC mill machines. The source is currently permitted for ten (10) CNC Mill machines, which makes a total of 38 CNC mill machines.

Twenty-three (23) EDM wire machines, coolant flooded with less than 1% by weight of VOC, with no regulated air pollutant emissions.

Four (4) EDM Rams, coolant flooded with less than 1% by weight of VOC, with no regulated air pollutant emissions.

One (1) laser etching station, with no regulated air pollutant emissions.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Permitted Emission Units and Pollution Control Equipment After Changes

(a) Three (3) glass bead blasting units, identified as BB-01 through BB-03 and each having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as BBC-01 through BBC-03, for particulate control and exhausting to interior of building;

(b) Nine (9) polishing jacks, identified as PJ-01 through PJ-09 and each having a capacity of 200 lbs per hour, using internal return air dust collectors, identified as PJC-01 through PJC-09, for particulate control and exhausting to interior of building;

(c) One (1) impro-clean parts washers, identified as PW-01, with a maximum solvent usage of less than 145 gallons per twelve (12) month period, using nonhalogenated solvents and exhausting to interior of building;

(d) Vehicular traffic on paved plant roads with maximum capacity of 1,168 vehicle miles traveled per year;

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

(f) Two (2) natural gas fired HVAC units, identified as HVAC-01 and HVAC-02 and each having a capacity of 0.2 MMBtu per hour;

(g) Five (5) natural gas fired HVAC units, identified as HVAC-03 through HVAC-07 and each having a capacity of 0.4 MMBtu per hour;

(h) Seven (7) metal fabrication CNC lathes with no regulated air pollutant emissions.

(j) Thirty-eight (38) metal fabrication CNC mill machines with no regulated air pollutant emissions.

(j) Two (2) metal fabrication cut-off saw stations with no regulated air pollutant emissions.

(k) Three (3) tungsten inert gas (TIG) stations, with a maximum wire consumption rate less than 625 lbs/day.

(l) Twenty-three (23) EDM wire machines, coolant flooded with less than 1% by weight of VOC, with no regulated air pollutant emissions.

(m) Four (4) EDM Rams, coolant flooded with less than 1% by weight of VOC, with no regulated air pollutant emissions.

(n) One (1) laser etching station, with no regulated air pollutant emissions.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 *	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.10	0.10		0.01	1.31	0.01	1.10	0.02	0.02 (Hexane)
Polishing Jacks and Bead Blasters Dust Collectors	12.07	12.07		0.00	0.00	0.00	0.00	0.00	0.00
Degreasing Operations	0.00	0.00		0.00	0.00	0.17	0.00	0.01	0.01 (Diethanol amine)
Paved Roads	0.71	0.14		0.00	0.00	0.00	0.00	0.00	0.00
Fugitive Emissions									
Total PTE of Entire Source	**12.88**	**12.31**		**0.01**	**1.31**	**0.18**	**1.10**	**0.03**	
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of *(pollutant(s))* are within the ranges listed in 326 IAC 2-5.5-1(b)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations).

(b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability – Entire Source

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

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

326 IAC 2-5.1-2 (Registrations)

Registration applicability is discussed under the Permit Level Determination – Registration section above

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1 (New Source of Hazardous Air Pollutants)

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

The source is subject to the requirements of 326 IAC 6-4. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

State Rule Applicability - Individual Facilities

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

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

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

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

The maximum process rate for three (3) glass bead blasting units, is 200 pounds per hour. Hence, based on the above formula the allowable particulate emission rate for the glass bead blasting unit shall be 0.88 pounds per hour.

The maximum process rate for each of the nine (9) polishing jacks, is 200 pounds per hour. Hence, based on the above formula the allowable particulate emission rate for each unit shall be 0.88 pounds per hour.

Based on the emission calculation performed the emission units will be able to comply with the requirements of 326 IAC 6-3-2.

326 IAC 8-3-2 (Cold Cleaner Degreasing Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Operation), the parts washer (PW-01) is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Degreasing Operations) since the unit was constructed after the July 1, 1990, applicability date. Pursuant to this rule, the Permittee shall::

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;
(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operating requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the part washer (PW-01) is subject to the requirements of 326 IAC 8-3-5, since this unit was constructed after

the July 1, 1990 applicability date. Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kilo-Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38 ^{O}C) (one hundred degrees Fahrenheit (100 ^{O}F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater 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 ^{O}C) (one hundred degrees Fahrenheit (100 ^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38 ^{o}C) (one hundred degrees Fahrenheit (100 ^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9 ^{O}C) (one hundred twenty degrees Fahrenheit (120 ^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

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

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty

percent (20%) of the waste solvent by weight could evaporate.

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

Conclusion and Recommendation

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 July 28, 2008.

The operation of this source shall be subject to the conditions of the attached proposed Notice only Changes to Registration No. 085-26810-00100. The staff recommends to the Commissioner that this registration be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Janet Mobley at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

Appendix A: Emission Summary
Company Name: Symmetry Medical Usa, Inc.
Address City IN Zip: 111 North Clay Street, Claypool, Indiana 46510
Notice Only Change No: R085-26810-00100
Reviewer: Janet Mobley
Date: August 14, 2008

Uncontrolled Emissions

Emission Units	PM	PM10	PM2.5	SO2	NOX	VOC	CO	Total HAPS	Worst Case Single HAP
Natural Gas Combustion Units	0.10	0.10		0.01	1.31	0.01	1.10	0.02	0.02 Hexane
Polishing Jacks & Bead Blasters Dust Collectors	12.07	12.07		0.00	0.00	0.00	0.00	0.00	0.00
Degreasing Operations	0.00	0.00		0.00	0.00	0.17	0.00	0.01	0.01 Diethanol amine
Paved Roads	0.71	0.14		0.00	0.00	0.00	0.00	0.00	0.00
Total	12.88	12.31		0.01	1.31	0.18	1.10	0.03	

Controlled Emissions

Emission Units	PM	PM10	PM2.5	SO2	NOX	VOC	CO	Total HAPs	Worst Case Single HAP
Natural Gas Combustion Units	0.10	0.10		0.01	1.31	0.02	1.10	0.02	0.02 Hexane
Polishing Jacks & Bead Blasters Dust Collectors	0.12	0.12		0.00	0.00	0.00	0.00	0.00	0.00
DeGreasing Operations	0.00	0.00		0.00	0.00	0.17	0.00	0.01	0.01 Diethanol amine
Paved Roads	0.71	0.14		0.00	0.00	0.00	0.00	0.00	0.00
Total	0.93	0.36		0.01	1.31	0.18	1.1	0.03	

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Source wide combustion sources

Company Name: Symmetry Medical USA, Inc. Claypool
Address City IN Zip: 111 North Clay Street, Claypool, IN 46510
Registration: 085-26810-00100
Reviewer: Janet Mobley
Date: 8/29/2008

The Source consists of the following natural gas combustion facilities:
1. Six (6) 0.1 MMBtu/hr Radiant Space Heaters(H01-H06) 0.6
2. Five (5) 0.4 MMBtu/hr HVAC units (HVAC03- HVAC07) 2
3. Two (2) 0.2 MMBtu/hr HVAC units (HVAC01-HVAC02) 0.4

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.0	26.3

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 *see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.1	0.0	1.3	0.1	1.1

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
PM emission factors are for total particulate matter.

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 7/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Source wide combustion sources
HAP Emissions

Company Name: Symmetry Medical USA, Inc. Claypool
Address City IN Zip: 111 North Clay Street, Claypool, IN 46510
Registration: 085-20412-00100
Reviewer: Gaurav Shil/EVP
Date: 8/29/2008

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMCF	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.8E-05	1.6E-05	9.9E-04	2.4E-02	4.5E-05

HAPs - Metals

	Lead	Barium	Chromium	Vanadium	Nickel
Emission Factor in lb/MMcf	5.0E-04	4.4E-03	1.4E-03	2.3E-03	2.1E-03
Potential Emission in tons/yr	6.6E-06	5.8E-05	1.8E-05	3.0E-05	2.8E-05

Methodology is the same as Page 2

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: Process Particulate Emissions
Bead Blasters and Polishing/Grinding Stations
Dust Collectors (BBC01-03 and PJC01-07)

Company Name: Symmetry Medical USA, Inc. Claypool
Address City IN Zip: 111 North Clay Street, Claypool, IN 46510
Registration: 085-26810-00100
Reviewer: Janet Mobley
Date: 8/29/2008

Emission Unit Description	Outlet Grain Loading (gr/acf)	Control Device Fan Flow Rate (acfm)	PM Control Efficiency (%)	Potential PM Emission Rate				Process Weight Rate (lb/hr)	326 IAC 6-3-2 PM Emission Rate (lb/hr)	Equivalent 326 IAC 6-3-2 PM Emission Rate (tons per year)
				Before Controls (lb/hr)	Before Controls (tons/yr)	After Controls (lb/hr)	After Controls (tons/yr)			
BBC-01	0.002185	400	98%	0.75	3.28	0.0075	0.0328	200	0.88	3.84
BBC-02	0.002185	400	98%	0.75	3.28	0.0075	0.0328	200	0.88	3.84
BBC-03	0.002185	400	98%	0.75	3.28	0.0075	0.0328	200	0.88	3.84
PJC-01	0.00012	550	95%	0.06	0.25	0.0006	0.0025	200	0.88	3.84
PJC-02	0.00012	550	95%	0.06	0.25	0.0006	0.0025	200	0.88	3.84
PJC-03	0.00012	550	95%	0.06	0.25	0.0006	0.0025	200	0.88	3.84
PJC-04	0.00012	550	95%	0.06	0.25	0.0006	0.0025	200	0.88	3.84
PJC-05	0.00012	550	95%	0.06	0.25	0.0006	0.0025	200	0.88	3.84
PJC-06	0.00012	550	95%	0.06	0.25	0.0006	0.0025	200	0.88	3.84
PJC-07	0.00012	550	95%	0.06	0.25	0.0006	0.0025	200	0.88	3.84
PJC-08	0.00012	550	95%	0.06	0.25	0.0006	0.0025	200	0.88	3.84
PJC-09	0.00012	550	95%	0.06	0.25	0.0006	0.0025	200	0.88	3.84
Total					**12.07**		**0.12**			

Methodology:

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

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

Appendix A: Emissions Calculations
Parts Washer (PW-01)

Company Name: Symmetry Medical USA, Inc. Claypool
Address City IN Zip: 111 North Clay Street, Claypool, IN 46510
Registration: 085-26810-00100
Reviewer: Janet Mobley
Date: August 29, 2008

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
PW-1																
Impro-Clean 1300	9.98	100.00%	0.0%	100.0%	0.0%	0.00%	0.04000	0.100	9.98	9.98	0.04	0.96	0.17	0.00	n/a	100%
Uncontrolled Potential Emissions											**0.040**	**0.958**	**0.175**	**-**		

*** Cold Cleaning**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Material	**Density (Lb/Gal)**	**Gallons of Material (gal/unit)**	**Maximum (unit/hour)**	**Weight % Benzene**	**Weight % Ethyl Benzene**	**Weight % Formalde-Hyde**	**Weight % Diethanol amine**	**Weight % Methanol**	**Weight % MEK**	**Weight % MIBK**	**Weight % Napthalene**	**Weight % Styrene**	**Weight % Toluene**	**Weight % Xylene**	**Benzene (ton/yr)**	**Ethyl Benzene (ton/yr)**	**Formaldeh yde (ton/yr)**	**Diethanol amine (ton/yr)**	**Methanol (ton/yr)**	**MEK (ton/yr)**	**MIBK (ton/yr)**	**Napthalene (ton/yr)**	**Styrene (ton/yr)**	**Toluene (ton/yr)**	**Xylene (ton/yr)**	**Total HAP (ton/yr)**
Impro-Clean 1300	9.98	0.04000	0.100	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Uncontrolled Potential Emissions															**-**	**-**	**-**	**0.01**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**0.01**

METHODOLOGY

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: Emission Calculations
Fugitive Emissions Calculations from Paved Plant Roads

Company Name: Symmetry Medical USA, Inc. Claypool
Address City IN Zip: 111 North Clay Street, Claypool, IN 46510
Registration: 085-26810-00100
Reviewer: Janet Mobley
Date: 8/29/2008

*** * paved roads * ***

The following calculations determine the amount of emissions created by vehicle traffic on paved roads, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 13.2.1.

1168 miles per year for all vehicles combined (based on information in Registration application)

Ef = k*(sL/2)^0.65*(W/3)^1.5 - C
= 0.24 lb PM-10/mile
= 1.21 lb PM/mile
where k = 0.016 (particle size multiplier for PM (k=0.082 for PM-30 or TSP)
sL = 0.6 road surface silt loading (g/m^2)
W = 30.4 tons average weight of all vehicles traveling the road
C = 0.00047 emission factor for 1980's vehicle exhaust, brake wear and tire wear for PM and PM10

PM-10: $\frac{0.24 \text{ lb/mi} \times 1168 \text{ mi/yr}}{2000 \text{ lb/ton}} =$ **0.14 tons/yr**

PM: $\frac{1.21 \text{ lb/mi} \times 1168 \text{ mi/yr}}{2000 \text{ lb/ton}} =$ **0.71 tons/yr**

Total PM Emissions From Paved Roads = 0.71 tons/yr

Total PM-10 Emissions From Paved Roads = 0.14 tons/yr

Appendix A: Emission Summary
Company Name: Symmetry Medical Usa, Inc.
Address City IN Zip: 111 North Clay Street, Claypool, Indiana 46510
Notice Only Change No: R085-26810-00100
Reviewer: Janet Mobley
Date: August 14, 2008

Uncontrolled Emissions

Emission Units	PM	PM10	PM2.5	SO2	NOX	VOC	CO	Total HAPS	Worst Case Single HAP
Natural Gas Combustion Units	0.10	0.10		0.01	1.31	0.01	1.10	0.02	0.02 Hexane
Polishing Jacks & Bead Blasters Dust Collectors	12.07	12.07		0.00	0.00	0.00	0.00	0.00	0.00
Degreasing Operations	0.00	0.00		0.00	0.00	0.17	0.00	0.01	0.01 Diethanol amine
Paved Roads	0.71	0.14		0.00	0.00	0.00	0.00	0.00	0.00
Total	12.88	12.31		0.01	1.31	0.18	1.10	0.03	

Controlled Emissions

Emission Units	PM	PM10	PM2.5	SO2	NOX	VOC	CO	Total HAPs	Worst Case Single HAP
Natural Gas Combustion Units	0.10	0.10		0.01	1.31	0.02	1.10	0.02	0.02 Hexane
Polishing Jacks & Bead Blasters Dust Collectors	0.12	0.12		0.00	0.00	0.00	0.00	0.00	0.00
DeGreasing Operations	0.00	0.00		0.00	0.00	0.17	0.00	0.01	0.01 Diethanol amine
Paved Roads	0.71	0.14		0.00	0.00	0.00	0.00	0.00	0.00
Total	0.93	0.36		0.01	1.31	0.18	1.1	0.03	

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