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: February 20, 2009

RE: Symmetry Medical USA, Inc. / 085-27485-00100

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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 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
FN-REGIS.dot 1/2/08

IDEM

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Mr. Paul Sparkman
Symmetry Medical USA, Inc.
486 West 350 North
Warsaw, IN 46582

February 20, 2009

Re: Registration Notice-Only Change
No. R085-27485-00059

Dear Mr. Sparkman:

Symmetry Medical USA, Inc. was issued a Registration No. R085-19142-00059 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 13, 2009, the Office of Air Quality (OAQ) received an application from the source relating to the construction and operation of a passivation (DDC) and passivation/Electropolish (OTHY) process. Emissions from these processes are assumed to be negligible because operating temperatures are below evaporation levels of the process chemicals and finishes are dip applied, which minimizes any agitation in the process. The addition of these units to the registration is considered a notice-only change, since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified in 326 IAC 2-5.5-6(d)(10) and 326 IAC 2-5.5-6(d)(12), respectively. The uncontrolled/unlimited potential to emit of the entire source will continue to be within the threshold levels specified in 326 IAC 2-5.5-1(b)(1). See appendix A. No new state rules are applicable to this source. There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) or National Emission standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this notice-only change.

Pursuant to 326 IAC 2-5.5-6, the registration is hereby revised as follows, with deleted language as ~~strikeouts~~ and new language **bolded**:

A.3 Emission Units and Pollution Control Equipment Summary

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

The following emission units are located at the Othy Division:

***

(k) One (1) medical passivation/electropolish process, approved for construction in 2009, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour), exhausting to stack PPF1, consisting of:

(1) One (1) soap bath, identified as CLEAN 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(2) One (1) nitric acid bath, identified as NITRIC 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(3) One (1) citric acid bath, identified as CITRIC 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(4) One (1) sodium dichromate bath, identified as DICROMATE 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(5) One (1) EPS 4000 bath, identified as EPS 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour); and

(6) One (1) aqua ammonia bath, identified as AMMONIA 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour).

The following emission units are located at the DDC Plant:

***

(l) One (1) medical passivation process, approved for construction in 2009, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour), exhausting to stack PPF2, consisting of:

(1) One (1) soap bath, identified as CLEAN D1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(2) One (1) nitric acid bath, identified as NITRIC D1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(3) One (1) citric acid bath, identified as CITRIC D1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour); and

(4) One (1) sodium dichromate bath, identified as DICROMATE D1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour).

The source shall continue to operate according to 326 IAC 2-5.5. Please find enclosed the revised registration.

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 Bruce Farrar, at (800) 451-6027, press 0 and ask for Bruce Farrar or extension 4-5401, or dial (317) 234-5401.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/BF

Attachment: Revised Registration and Appendix A

cc: File - Kosciusko County
Kosciusko County Health Department
Air Compliance Section
IDEM Northern Regional Office
Compliance Data Section
Permits Administrative and Support 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 issued on March 27, 2008
Fourth Registration Notice-Only Change No. 085-26809-00059 issued on August 29, 2008

Fifth Notice-Only Change No. 085-27485-00059	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 20, 2009

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, A.2 and A.3 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 Source Definition

This medical instrument manufacturing company consists of two (2) plants:

(1) Othy Division (formerly called North Plant), an existing plant, located at 486 West 350 North, Warsaw, Indiana 46582, started operation in 1996 (SIC code: 3842); and

(2) DDC Plant, a new plant, located at 3724 State Road 15, Warsaw, Indiana 46582, starting operation in 2006 (SIC code: 3842).

Since the two (2) plants have the same SIC codes, manufacture the same products, are owned by the same company, and the DDC Plant is adjacent to the Othy Division (less than one mile apart), IDEM, OAQ has determined in Registration Revision 085-23056-00059 issued July 27, 2006, that the Othy Division and the DDC Plant are considered a single source.

A.3 Emission Units and Pollution Control Equipment Summary

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

The following emission units are located at the Othy Division:

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

(1) Twenty-one (21) polishing jacks, identified as PJC-01 through PJC-21, each controlled by a dust collector.

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

(1) Four (4) Glass Bead Blasters, identified as SB-1 through SB-4, using glass beads as the blast media, each controlled by a dust collector.

(c) Six (6) parts washers, identified as W1 through W6, four constructed in 2004 and two in 2008, each with a maximum solvent usage less than 145 gallons per 12 months, using non-halogenated solvents.

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

(1) Seven (7) CNC Grinders, coolant flooded with less than 1% by weight of VOC, no emissions.

(2) Fifteen (15) CNC lathes.

(3) Twenty-one (21) CNC Mill.

(4) Nine (9) EDM Wire.

(5) Cutting and grinding instruments.

(6) Two (2) tungsten inert gas (TIG) stations, each with a maximum wire consumption rate less than 625 lbs/day.

(7) One (1) EDM Ram.

(8) Two (2) laser cutters.

(9) Two (2) electric ovens.

(10) Four (4) hydraulic presses.

(e) 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.

(f) Two (2) natural gas-fired water evaporators, identified as EV-01 and EV-02, constructed in 2005, each with a maximum heat input capacity of 0.2 MMBtu/hr, and exhausting to stack vents EVSV-01 and EVSV-02, respectively.

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

(h) One (1) Cut-off saw.

(i) One (1) ROBO-Drill.

(j) Three (3) Laser Etch stations.

(k) One (1) medical passivation/electropolish process, approved for construction in 2009, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour), exhausting to stack PPF1, consisting of:

(1) One (1) soap bath, identified as CLEAN 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(2) One (1) nitric acid bath, identified as NITRIC 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(3) One (1) citric acid bath, identified as CITRIC 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(4) One (1) sodium dichromate bath, identified as DICROMATE 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(5) One (1) EPS 4000 bath, identified as EPS 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour); and

(6) One (1) aqua ammonia bath, identified as AMMONIA 1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour).

The following emission units are located at the DDC Plant:

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

(1) Four (4) polishing jacks, identified as D-1 through D-4, each controlled by a dust collector.

(2) One (1) Glass Bead blaster, identified as SB-5, using glass beads as the blast media, and controlled by a dust collector.

(b) One (1) parts washer, identified as W7, constructed in 2008, with a maximum solvent usage less than 145 gallons per 12 months, using non-halogenated solvents.

(c) One (1) TIG welder, with a maximum metal consumption of 2.43 lbs/hr.

(d) Three (3) natural gas-fired HVAC units, identified as HVAC#12, HVAC#13, and HVAC#14, each with a heat input rate of 0.324 MMBtu/hr.

(e) Three (3) natural gas-fired HVAC units, identified as HVAC#15, HVAC#16, and HVAC#17, each with a heat input rate of 0.23 MMBtu/hr.

(f) One (1) natural gas-fired resident shop heater, identified as RSH-1, with a heat input rate of 0.165 MMBtu/hr.

(g) Three (3) CNC Lathes.

(h) Nine (9) CNC Mills.

(i) Four (4) EDM wire units, coolant flooded with less than 1% by weight of VOC.

(j) One (1) Laser Etch station.

(k) One (1) EDM Ram, coolant flooded with less than 1% by weight of VOC.

(l) One (1) medical passivation process, approved for construction in 2009, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour), exhausting to stack PPF2, consisting of:

(1) One (1) soap bath, identified as CLEAN D1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(2) One (1) nitric acid bath, identified as NITRIC D1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour);

(3) One (1) citric acid bath, identified as CITRIC D1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour); and

(4) One (1) sodium dichromate bath, identified as DICROMATE D1, with a maximum capacity of 20 pounds of stainless steel per hour (or 2.5 pounds of titanium per hour).

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. 085-19142-00059 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).

SECTION D EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:
Emission units located at the Othy Division:

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

(1) Twenty-one (21) polishing jacks, identified as PJC-01 through PJC-21, each controlled by a dust collector.

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

(1) Four (4) Glass Bead Blasters, identified as SB-1 through SB-4, using glass beads as the blast media, each controlled by a dust collector.

(c) Six (6) parts washers, identified as W1 through W6, four constructed in 2004 and two in 2008, each with a maximum solvent usage less than 145 gallons per 12 months, using non-halogenated solvents.

Emission units located at the DDC Plant:

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

Four (4) polishing jacks, identified as D-1 through D-4, each controlled by a dust collector.

One (1) Glass Bead blaster, identified as SB-5, using glass beads as the blast media, and controlled by a dust collector.

(b) One (1) parts washer, identified as W7, constructed in 2008, with a maximum solvent usage less than 145 gallons per 12 months, using non-halogenated solvents.

(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.1.1 Particulate Emission Limitations for Manufacturing Process [326 IAC 6-3]

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 Othy Division and DDC Plant	200	0.88
Polishing Process at Othy Division (PJC01 through PJC21)	200	0.88
Machining and Milling Process at Othy Division	181	0.82
Polishing Process at Othy Division and DDC Plant (D1 through D4 and SB1 through SB5)	172	0.79

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

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

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

D.1.2 Volatile Organic Compounds [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, for each of parts washers (W1 through W7), 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.1.3 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 each of the parts washers (W1 through W7):

(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.

Compliance Determination Requirements

D.1.4 Particulate Control

The dust collectors shall be in operation at all times that the polishing jacks (units PJC 01-PJC-21, D-1 through D4, and glass bead blasters (SB-1 through SB5) are in operation.

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:

Appendix A: Emission Summary

Company Name: Symmetry Medical USA, Inc.
Address City IN Zip: 486 West 350 North, Warsaw, Indiana 46582
Notice Only Change No: R085-27485-00059
Reviewer: Bruce Farrar
Date: February 13, 2009

Uncontrolled Emissions

Emission Units	PM	PM10	PM2.5	SO2	NOX	VOC	CO	HAPS
Polishing & Bead Blasters	8.84	8.84	8.84	0.00	0.00	0.00	0.00	0.00
Parts Washers	0.00	0.00	0.00	0.00	0.00	1.27	0.00	0.00
Natural Gas Combustion Units at Othy	0.07	0.29	0.29	0.02	3.80	0.21	3.19	0.07 (Hexane)
Natural Gas Combustion Units at DDC	0.01	0.06	0.06	0.00	0.78	0.04	0.66	0.01(Hexane)
Gas Fired Heater at Othy	0.01	0.01	0.01	0.0011	0.18	0.01	0.15	0
medical passivation/electropolish process at Othy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
medical passivation process at DDC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	8.93	9.2	9.2	0.02	4.76	1.53	4.00	0.08

Controlled Emissions

Emission Units	PM	PM10	PM2.5	SO2	NOX	VOC	CO	HAPS
Polishing & Bead Blasters	8.84	8.84	8.84	0.00	0.00	0.00	0.00	0.00
Parts Washers	0.00	0.00	0.00	0.00	0.00	1.27	0.00	0.00
Natural Gas Combustion Units at Othy	0.07	0.29	0.29	0.02	3.80	0.21	3.19	0.07 (Hexane)
Natural Gas Combustion Units at DDC	0.01	0.06	0.06	0.00	0.78	0.04	0.66	0.01(Hexane)
Gas Fired Heater	0.01	0.01	0.01	0.0011	0.18	0.01	0.15	0
medical passivation/electropolish process at Othy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
medical passivation process at DDC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	8.93	9.2	9.2	0.02	4.76	1.53	4.00	0.08

Assumption: PM 2.5 = PM10