



## FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

### SECTION I: PLANS AND SCHEDULES

This section lists all plans approved by AQMD for the purposes of meeting the requirements of applicable AQMD rules specified below. The operator shall comply with all conditions specified in the approval of these plans, with the following exceptions:

- a. The operator does not have to comply with NOx or SOx emission limits from rules identified in Table 1 or Table 2 of Rule 2001(j) which become effective after December 31, 1993.
- b. The operator does not have to comply with NOx or SOx emission limits from rules identified in Table 1 or Table 2 of Rule 2001(j) after the facility has received final certification of all monitoring and reporting requirements specified in Section F and Section G.

Documents pertaining to the plan applications listed below are available for public review at AQMD Headquarters. Any changes to plan applications will require permit modification in accordance with Title V permit revision procedures.

List of approved plans:

Application	Rule
374185	1407
466858	3003
481923	1420
530090	1420.1

NOTE: This section does not list compliance schedules pursuant to the requirements of Regulation XXX - TitleV Permits; Rule 3004(a)(10)(C). For equipment subject to a variance, order for abatement, or alternative operating condition granted pursuant to Rule 518.2, equipment specific conditions are added to the equipment in Section D or H of the permit.

January 20, 2012

Corey Vodvarka  
Plant Manager  
Exide Technologies  
2700 South Indiana Street  
Vernon, CA 90058

**Reference: Application No. 530090**

**Approval of the Rule 1420.1 Compliance Plan for Facility ID # 124838**

Dear Mr. Vodvarka:

The South Coast Air Quality Management District (AQMD) has received your Application No. 530090, submitted on December 16, 2011, for a Rule 1420.1 (Emission Standards for Lead-Acid Battery Recycling Facilities) Compliance Plan, pursuant to Rule 1420.1(g), for your facility located at 2700 South Indiana Street, Vernon, California 90058. AQMD staff has evaluated and approved your Rule 1420.1 Compliance Plan subject to the following conditions.

**CONDITIONS**

1. Exide shall implement all lead mitigation measures described in the plan resubmitted by Exide on January 20, 2012, unless otherwise specified below.
2. Exide shall install a minimum of six (6) boot wash stations at the exits of the total containment buildings at this facility. The installation of the boot wash stations shall be completed not later than June 30, 2012. Written notification shall be provided to the AQMD when installation is complete.
3. Exide shall designate one or more forklifts to be exclusively used inside of the total containment buildings so that the probability of tracking lead bearing materials outside of the containment buildings is lowered when heavy moving equipment is operated at this facility. The first forklift dedicated to indoor use only shall be implemented not later than June 30, 2012. Written notification shall be provided to the AQMD when the new forklift(s) are operational. For the purpose of this condition, any forklift operated inside of a containment building shall be completely washed and decontaminated inside of a total containment building so as to be visually free of all lead contamination prior to transferring this forklift outside of the containment building for maintenance, repair, or other purposes. A written record of equipment washing/decontamination shall be kept with regards to each forklift transferred out of a total containment building for the purposes stated in this condition and this record shall be signed by supervision or management level staff and presented to AQMD personnel upon request.

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4. On and after January 1, 2012, beginning with the 30-day period of January 1, 2012 through January 30, 2012, if monitored ambient lead concentrations exceed  $0.15 \mu\text{g}/\text{m}^3$ , but no more than  $0.23 \mu\text{g}/\text{m}^3$ , on a rolling 30 day average at any AQMD or AQMD-approved ambient monitor, Exide shall implement the following mandatory daily process curtailments:
  - A. Reduce the amount charged to the reverberatory furnace by 15% of the daily average charged over the prior 90 days;
  - B. The mandatory curtailments contained within this condition shall begin within 48 hours of the time when Exide receives the sampling results (and in the case of an AQMD monitor, the quality assurance and O&M data for the monitor). Exide shall calculate the above-referenced averages based on the total materials charged in the relevant time period above divided by the number of days when there were materials charged and shall provide supporting documentation to the District to justify the calculated averages prior to the required time of implementation. These mandatory curtailments shall remain in effect until the monitoring results at the affected monitoring station reflect 15 consecutive 30-calendar day averages of less than  $0.15 \mu\text{g}/\text{m}^3$ .
5. On and after January 1, 2012, beginning with the 30-day period of January 1, 2012 through January 30, 2012, if monitored ambient lead concentrations exceed  $0.23 \mu\text{g}/\text{m}^3$ , but no more than  $0.30 \mu\text{g}/\text{m}^3$ , on a rolling 30 day average at any AQMD or AQMD-approved ambient monitor. Exide shall implement the following mandatory daily process curtailments:
  - A. Reduce the amount charged to the reverberatory furnace by 25% of the daily average charged over the prior 90 days;
  - B. The mandatory curtailments contained within this condition shall begin within 48 hours of the time when Exide receives the sampling results (and in the case of an AQMD monitor, the quality assurance and O&M data for the monitor). Exide shall calculate the above-referenced averages based on the total materials charged in the relevant time period above divided by the number of days when there were materials charged and shall provide supporting documentation to the District to justify the calculated averages prior to the required time of implementation. These mandatory curtailments shall remain in effect until the monitoring results at the affected monitoring station reflect 15 consecutive 30-calendar day averages of less than  $0.15 \mu\text{g}/\text{m}^3$ .
6. On and after January 1, 2012, beginning with the 30-day period of January 1, 2012 through January 30, 2012, if monitored ambient lead concentrations exceed  $0.30 \mu\text{g}/\text{m}^3$  on a rolling 30 day average at any AQMD or AQMD-approved ambient monitor, Exide shall implement the following mandatory daily process curtailments:

- A. Reduce the amount charged to the reverberatory furnace by 50% of the daily average charged over the prior 90 days;
  - B. The mandatory curtailments contained within this condition shall begin within 48 hours of the time when Exide receives the sampling results (and in the case of an AQMD monitor, the quality assurance and O&M data for the monitor). Exide shall calculate the above-referenced averages based on the total materials charged in the relevant time period above divided by the number of days when there were materials charged and shall provide supporting documentation to the District to justify the calculated averages prior to the required time of implementation. These mandatory curtailments shall remain in effect until the monitoring results at the affected monitoring station reflect 30 consecutive 30-calendar day averages of less than  $0.15 \mu\text{g}/\text{m}^3$  or the monitoring results at the affected monitoring station reflect ten consecutive days below  $0.12 \mu\text{g}/\text{m}^3$  and no other monitor causes a violation of Rule 1420.1.
7. Exide shall complete construction of the baghouse area Total Containment Building no later than March 31, 2012. Exide shall notify the Executive Officer of the AQMD in writing within 48 hours of completion of the construction.
  8. On or after completion of construction of the baghouse area Total Containment Building, but no later than March 31, 2012, if monitored ambient lead concentrations exceed  $0.15 \mu\text{g}/\text{m}^3$  on a rolling 30 day average at any AQMD or AQMD-approved ambient monitor, Exide shall commence implementing the specific lead emission mitigation measures listed below in this condition. Each of these mitigation measures may be implemented individually or in any combination based on the specific situation and information available at the time. Within 15 days of each occurrence, Exide shall submit to the AQMD for approval the selected measure(s) to be implemented along with a description of the specific situation and available information that justifies the specific selection. An implementation timeline shall also be included and shall be established based on Exide's best effort for implementation. The selected measure(s) shall be implemented as approved by the AQMD. These specific individual mitigation measures are as follows:
    - A. Install an additional room ventilation baghouse or dust collector, equipped with a second stage high efficiency particulate air (HEPA) filter, with sufficient blower capacity to move a minimum of 50,000 CFM of air from one or more of the following locations:
      - a. The battery crusher room in the north end of the RMPS building.
      - b. The truck loading and unloading dock on the south end of the RMPS building.
      - c. The furnace room in the smelter building.
      - d. The cupola feed room in the south end of the smelter building.

As an alternative to adding additional ventilation with individual baghouses or dust collectors, Exide may install a single larger air pollution control system with at least 200,000 CFM of blower capacity to cover all four of these locations.

- B. Install second stage HEPA filters on one or more of the following air pollution control systems:
- a. The hard lead refinery baghouse (device C47).
  - b. The soft lead refinery baghouse (device C46).
  - c. The MAC baghouses venting the RMPS building (devices C156, C157).
  - d. The cupola furnace feed room baghouse (device C48).
- C. All new HEPA filter installations performed pursuant to parts A and B of this condition shall comply with the following requirements:
- a. The HEPA filters used in this equipment shall be certified, in writing, by the manufacturer to have a minimum control efficiency of 99.97 percent on 0.3 micron particles.
  - b. Copies of the HEPA filter certifications shall be kept and maintained on file for a minimum of 5 years and shall be provided to District personnel upon request.
- D. Following completion of all required mitigation measures listed in parts A and B of this condition, Exide shall evaluate the following additional mitigation measures:
- Install an additional total or partial enclosure(s) of one or more of the following locations:
- a. Reverberatory furnace A-pipe.
  - b. Cupola furnace A-pipe.
  - c. Additional area enclosure(s) to be determined.
- E. The mitigation measures listed in part D of this condition shall not be used to fulfill the requirements of the first paragraph of this condition unless all mitigation measures in parts A and B of this condition have first been implemented. However, Exide may voluntarily implement the measures in part D of this condition as additional voluntary measures prior to exhausting all required measures listed in parts A and B of this condition. An exception to this requirement may be made in special cases where the AQMD, upon examining all available information, has determined that an A-pipe, or other piece of equipment as applicable, is the cause for an ambient lead concentration limit exceedance. In all cases, Exide shall obtain written permission from the AQMD, and written

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Permits to Construct, where applicable, prior to the commencement of construction of such enclosure(s) listed in part D of this condition.

9. Prior to implementing parts A and B of Condition No. 8, Exide shall first submit the required permit applications, additional information and associated fees to the AQMD and obtain the required written Permits to Construct required prior to commencement of construction.
10. For the purpose of compliance with the incremental mitigation measures in Condition No. 8, when one requirement is triggered by a violation of the  $0.15 \mu\text{g}/\text{m}^3$  rolling 30 day average lead concentration limit, a second and subsequent mitigation measure may not be required for additional violations of the  $0.15 \mu\text{g}/\text{m}^3$  rolling 30 day average lead concentration limit, until after the ongoing mitigation measure has been implemented. Exide shall notify the AQMD in writing within 48 hours of completion of each mitigation measure in Condition No. 8.
11. The specific selection and implementation of any required mitigation measure described in these conditions is subject to written approval from the AQMD. Written approval from the AQMD shall take into consideration the nature and location from each monitoring station of any event determined to be associated, or apparently associated (based on available data) with (an) ambient lead concentration exceedance(s) triggering the implementation of a required mitigation measure.

In addition to compliance with the mitigation measures described in the submitted compliance plan, and the modified mitigation measures described in the conditions of this plan approval letter, Exide Technologies shall comply with all applicable requirements of Rule 1420.1, 40 CFR 63 Subpart X, all applicable AQMD Rules and Regulations, and all laws, ordinances, and regulations of other governmental agencies which are applicable to the operation of this facility. This plan approval letter has been incorporated into Section I of your Title V facility permit and any changes to the plan shall be done in accordance with Title V permit revision requirements pursuant to Regulation XXX.

Should you have any questions regarding this plan approval, please contact Mr. Marco Polo at (909) 396-2633.

Very truly yours,

Jay Chen, P.E.  
Senior Engineering Manager  
Engineering and Compliance

JC/CT/TGL/MAP

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Application File