

FACILITY PERMIT TO OPERATE QUEMETCO INC

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 NO_x or SO_x 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 NO_x or SO_x 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
299744	1407
436957	3003
488109	1420
530545	1420.1

NOTE: This section does not list compliance schedules pursuant to the requirements of Regulation XXX - Title V 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 23, 2013

Mr. R. Scott Bevans
Vice President - California Operations
Quemetco, Inc.
720 South Seventh Avenue
City of Industry, CA 91746

Reference: Application No. 530545

Approval of the Rule 1420.1 Compliance Plan for Facility ID # 8547

Dear Mr. Bevans:

The South Coast Air Quality Management District (AQMD) has received Application No. 530545, submitted by Quemetco 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 720 South 7th Avenue, City of Industry, California 91746. AQMD staff has evaluated and approved your Rule 1420.1 Compliance Plan subject to the following conditions.

CONDITIONS

1. Quemetco shall implement all of lead emission reduction measures described in the plan submitted under Application No. 530545, and the lead emissions reduction measures in the conditions stated below, unless otherwise specified below.
2. Quemetco shall install truck dock seals on the battery wrecker enclosure building. If these changes involve a physical extension of the walls of the battery wrecker enclosure building, permit applications for the dock seal installation shall be submitted to the AQMD no later than June 1, 2013. An implementation timeline shall be included in the permit applications and shall be established based on Quemetco's best effort for implementation. Installation of the dock seals shall be implemented only after receiving a written Permit to Construct and installation shall be completed in accordance with a time frame approved by the AQMD.
3. Whenever 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, Quemetco shall thereafter conduct daily ambient air monitoring for lead at all on-site monitoring stations. Not later than Friday of each week, Quemetco shall submit the results of such daily ambient monitoring data for all of Quemetco's on-site monitoring stations for the previous

Monday through Sunday. The results of the monitoring data shall be submitted electronically in the form of a Microsoft Excel spreadsheet document, or other format approved by the AQMD, and shall contain, at a minimum, the following information for each day:

- A. Calendar date
- B. Monitor identification number
- C. 24-hour average lead concentration in micrograms per cubic meter, for each monitoring station
- D. Rolling 30-day average lead concentration data for each monitoring station
- E. Wind speed and direction from the Quemetco onsite wind monitoring station

The report shall be submitted by email attachment to the following recipients, until otherwise directed by the AQMD:

Edwin Pupka, Senior Enforcement Manager @ epupka@aqmd.gov
Charles Tupac, Air Quality & Compliance Supervisor @ ctupac@aqmd.gov
Marco Polo, Air Quality Engineer II @ mpolo@aqmd.gov

The monitoring reporting schedule in this condition applies in addition to the monitoring reporting requirements in the Rule 1420 plan issued under Application No. 471357. When the monitored ambient lead concentrations return to a value less than $0.12 \mu\text{g}/\text{m}^3$ on a rolling 30-day average at all AQMD or AQMD-approved ambient monitors, Quemetco may revert to the ambient air monitoring reporting frequency required by Rule 1420.1 (n)(1)(A).

4. If monitored ambient lead concentrations exceed $0.12 \mu\text{g}/\text{m}^3$ on a rolling 30-day average at any AQMD or AQMD-approved ambient monitor, Quemetco shall implement a Daily Observation Log describing any and all events occurring at this facility which may have contributed to this lead concentration level, and actions which have been taken to mitigate lead emissions, until the rolling 30 day average ambient lead concentration(s) are reduced to levels less than $0.12 \mu\text{g}/\text{m}^3$.
5. If monitored ambient lead concentrations exceed $0.12 \mu\text{g}/\text{m}^3$ on a rolling 30-day average at any AQMD or AQMD-approved ambient monitor, Quemetco shall implement the use of a water truck to keep high traffic and activity areas wet for the purpose of dust suppression. The wetting activity shall occur on a daily basis with at least one wetting event per shift. Such wetting activity shall continue until the rolling 30 day average ambient lead concentration(s) are reduced to levels less than $0.12 \mu\text{g}/\text{m}^3$.
6. If monitored ambient lead concentrations exceed $0.14 \mu\text{g}/\text{m}^3$ on a rolling 30-day average at any AQMD or AQMD-approved ambient monitor, Quemetco shall implement a curtailment schedule for the battery breaking operation according to the following conditions:

- A. Quemetco shall implement a curtailment of battery breaking operations to a maximum operating schedule of not more than 6 days per week for 15 consecutive days. The mandatory curtailments contained within this condition shall begin within 48 hours of the time when Quemetco receives the sampling results (and in the case of an AQMD monitor, the quality assurance and O&M data for the monitor).
 - B. If monitored ambient lead concentrations exceed $0.14 \mu\text{g}/\text{m}^3$ on a rolling 30-day average at any AQMD or AQMD-approved ambient monitor for more than the initial 15 consecutive days of the period addressed in subpart A of this condition, Quemetco shall increase the curtailment of the battery breaking operation to a maximum operating schedule of not more than 5 days per week. The mandatory curtailments contained within this condition subpart shall be continued until the rolling 30 day average at all AQMD or AQMD-approved ambient monitors is reduced to levels less than $0.14 \mu\text{g}/\text{m}^3$, but not less than a minimum of 15 consecutive days at this curtailment level.
 - C. The curtailment cycles described in this condition shall be repeated each time that the monitored ambient lead concentrations exceed $0.14 \mu\text{g}/\text{m}^3$ on a rolling 30-day average at any AQMD or AQMD-approved ambient monitor.
7. If monitored ambient lead concentrations exceed $0.14 \mu\text{g}/\text{m}^3$ on a rolling 30-day average at any AQMD or AQMD-approved ambient monitor, Quemetco shall operate both of the room ventilator baghouses in the battery breaking total enclosure building simultaneously for a minimum of 15 days, or until the rolling 30 day average lead concentrations at all AQMD and AQMD approved monitoring stations are less than $0.14 \mu\text{g}/\text{m}^3$, whichever period is longer. The requirement in this condition to operate both of the room ventilator baghouses in the battery enclosure building simultaneously shall not apply at times when the battery breaking system is not in operation.
 8. A daily log of all maintenance activities (including but not limited to those activities defined in Rule 1420.1(c)(15) that are performed outside of total enclosure buildings shall be maintained. This log shall be maintained for a minimum of 5 years and made available to AQMD personnel upon request. This log shall itemize the date, time and description of each of these activities.
 9. 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 and are determined to be related to a maintenance activity described in Condition No. 8 that were performed according to the requirements of Rule 1420.1(i), Quemetco shall commence implementing the following lead emission reduction measures for all future maintenance activities as follows:
 - A. For maintenance activities performed on equipment outside of a total enclosure building, Quemetco shall obtain the necessary permits to construct and install a

permanent total enclosure building around the subject equipment location. Quemetco shall submit applications for Permit to Construct and/or Operate, as applicable, within 60 calendar days from the time Quemetco receives the sampling results (and in the case of an AQMD monitor, the quality assurance and O&M data for the monitor). An implementation timeline shall be included in the permit applications and shall be established based on Quemetco's best effort for implementation. Construction of the permanent total enclosure building shall be implemented only after receiving a written Permit to Construct and construction shall be completed in accordance with a time frame approved by the AQMD.

- B. For maintenance activities performed on duct work which runs along the outside roof or outside side(s) of (a) building(s) at this facility, Quemetco shall re-route the subject ductwork, to the maximum extent possible, to the interior of a containment building which is maintained under negative pressure. The feasibility of implementing the re-routing of duct work shall take into account safety issues, sound engineering design, and other relevant limitations. Quemetco shall propose such feasibility issues to the AQMD and they shall not be considered valid unless approved by the AQMD in writing.
 - C. In lieu of Condition 9A & 9B above, Quemetco may propose to the AQMD an alternate lead emission reduction measure for maintenance activities. Such proposed alternative measures shall not be used unless approved by the AQMD in writing.
10. If it is determined that the operation of the waste water treatment plant at this facility results in monitored ambient lead concentrations in excess of $0.15 \mu\text{g}/\text{m}^3$ on a rolling 30-day average at any AQMD or AQMD-approved ambient monitor, Quemetco shall implement the following lead emission reduction measures:
- A. Construct a permanent total enclosure building, maintained under negative pressure, around the waste water treatment plant, and the exemption from written permit requirement for the waste water treatment equipment provided by Rule 219 (p)(16) (as amended June 1, 2007, for industrial wastewater treatment equipment) shall not apply pursuant to Rule 219 (s)(2), on and after the date of exceedance. For equipment modifications or new construction, and for loss of exemption from Rule 219, as required in this condition, Quemetco shall submit applications for Permit to Construct and/or Operate, as applicable, within 60 calendar days of the time when Quemetco receives the sampling results (and in the case of an AQMD monitor, the quality assurance and O&M data for the monitor). An implementation timeline shall be included in the permit applications and shall be established based on Quemetco's best effort for implementation. Construction of the permanent total enclosure building(s) shall be implemented only after receiving a written Permit to Construct and construction shall be completed in accordance with a time frame approved by the AQMD.

- B. In lieu of Condition 10A above, Quemetco may propose to the AQMD an alternate lead emission reduction measure related to waste water treatment activities. Such proposed alternative measures shall not be used unless approved by the AQMD in writing.
11. After implementation of any or all of the lead emission reduction measures in this plan, if AQMD determines such measures to be ineffective, AQMD may require Quemetco to file an application to modify this Rule 1420.1 Plan so as to include additional control measures as proposed by Quemetco and/or additional control measures as required by AQMD.

In addition to compliance with the lead emission reduction measures described in the submitted compliance plan, and the modified/additional lead emission reduction measures described in the conditions of this plan approval letter, Quemetco 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 A Polo at (909) 396-2633.

Very truly yours,

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

JC/CDT/TGL/MAP

cc: Mohsen Nazemi
Jill Whynot
Nancy Feldman
Ed Pupka
Application File