

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
 ENGINEERING AND COMPLIANCE
 APPLICATION PROCESSING AND CALCULATIONS

| | |
|----------------------|--------------------|
| PAGES 8 | PAGE 1 |
| APPL. NO see p. 1 | DATE 05-02-2012 |
| PROCESSED BY MAP | CHECKED BY |

P/C

COMPANY NAME AND ADDRESS

Exide Technologies
 2700 South Indiana Street
 Los Angeles, CA 90023

ID 124838

mailing and equipment address

EQUIPMENT DESCRIPTION

(NEW EQUIPMENT AND CHANGES TO EXISTING EQUIPMENT ARE INDICATED IN BOLD TYPE)

APPLICATION NO. 533201

TITLE V FACILITY PERMIT REVISION

APPLICATION NO. 533202 (MODIFICATION)

- ENCLOSURE, BUILDING, RAW MATERIAL PREPARATION SYSTEM, 125 FT W. X 329 FT L. X 75 FT H., APPROXIMATE DIMENSIONS
- ENCLOSURE, BUILDING, TRUCK LOADING AND UNLOADING, 21 FT W. X 41 FT L. X 17 FT. H. APPROXIMATE DIMENSIONS**

HISTORY

The following table describes the status and description of the submitted applications:

| A/N | DATE RECEIVED | CLASS | DESCRIPTION |
|--------|---------------|-------|---|
| 533201 | 03/07/2012 | III | TITLE V FACILITY PERMIT REVISION |
| 533202 | 03/07/2012 | I | RMPS TOTAL ENCLOSURE MODIFICATION APPLICATION |

The table below summarizes the recent permit history regarding the subject equipment:

| RMPS BUILDING ENCLOSURE | |
|-------------------------|---|
| 533202 | Received 3/7/2012 for a P/C to install a truck enclosure building addition. |
| 500783 | Received 7/16/2009 for alterations to the raw material preparation system (RMPS) building by the total enclosure of various parts of this building which were previously open to the atmosphere. This building was previously exempt from permit requirements. It lost exemption pursuant to Order for Abatement (O/A) issued under case no. 3151-21 and lead NESHAP applicability. P/C issued 3-30-2010, P/O issued 6-30-2011. |

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

| | |
|-----------------------------|---------------------------|
| PAGES 8 | PAGE 2 |
| APPL. NO see p. 1 | DATE 05-02-2012 |
| PROCESSED BY MAP | CHECKED BY |

The following table provides the most recent chronology of events at this facility regarding the start and implementation of enhanced lead abatement and monitoring practices with regards to the RMPS building.

| DATE | DESCRIPTION |
|-------------|---|
| 06/25/2009 | Stipulated Order for Abatement under case no. 3151-21 is heard by the Hearing Board. Exide agrees to perform certain remediations of their operation to further reduce lead emission concentrations at the fence lines of this facility in order to comply with Rule 1420 (d) and the State and National AAQS for lead emissions. |
| 7/2/2009 | Hearing Board issues Findings and Decisions approving stipulated O/A under Case No. 3151-21. It contains the requirements for the submittal of the permit applications in this project. |
| 7/16/2009 | A/N 500783 submitted to convert RMPS building into total enclosure. |
| 3/7/2012 | A/N 533202 submitted to install truck enclosure building addition. This addition is not related to the O/A. It is a voluntary addition submitted by Exide to enhance compliance with Rule 1420.1 with regards to ambient lead concentration control. |

PROCESS DESCRIPTION

Exide Technologies is a secondary lead smelter. The subject permit applications were submitted to install a truck enclosure building addition to control fugitive dust during plastic scrap truck loading at the RMPS building. Previously, Exide converted the RMPS building into a total enclosure to comply with conditions in the Order for Abatement issued under Hearing Board Case No. 3151-21 on July 2, 2009. Descriptions are provided below for the purpose of each permit application belonging to this project.

PREVIOUS A/N 500783 RMPS TOTAL ENCLOSURE APPLICATION

Exide has constructed building enhancements to the existing RMPS building at Exide. Specifically, additional walls have been constructed as follows:

1. The North West corner of the building where the battery crusher hopper is located.
2. The battery scrap/mud settling/separator tanks located on the West wall at the North end of the building.
3. Any other openings in the structure which previously existed and which resulted in this building previously being only a partial enclosure.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

| | |
|-----------------------------|---------------------------|
| PAGES 8 | PAGE 3 |
| APPL. NO see p. 1 | DATE 05-02-2012 |
| PROCESSED BY MAP | CHECKED BY |

This building is approximately 329 feet long from north to south. It includes the battery crusher hopper room which Exide refers to as the RMPS building, the reverb feed room next to the RMPS room, and a mud feed room located on the south side of the reverb feed room. This south room is adjacent to the south corridor building which connects the RMPS structure on the west side of this facility with the smelter building on the east side of this facility. The following aerial view illustrates this arrangement.



For the purpose of previous permit modifications, the RMPS, reverb feed, and mud/wet feed rooms are classified as the "RMPS building". The permit unit dimensions include the total final width and length after the building extensions to enclose the "mud tanks" on the northwest side of this structure.

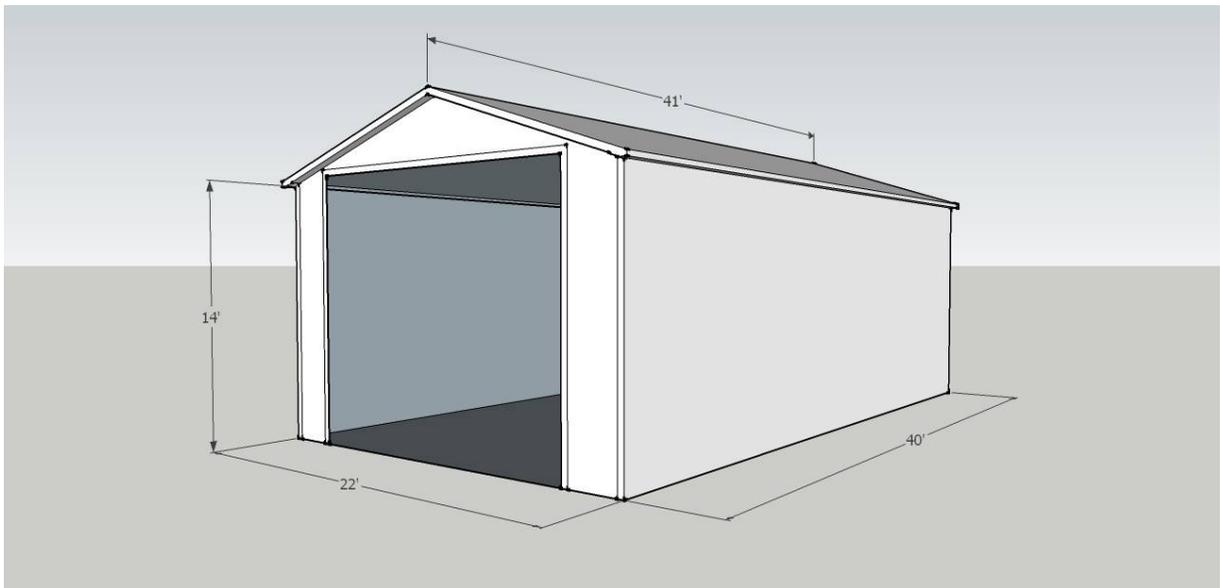
CURRENT A/N 533202 RMPS TRUCK ENCLOSURE EXTENSION

Exide is proposing to install a truck enclosure extension to the RMPS building consisting of a tunnel enclosure equipped with a roll-up door to enclose trucks while they are being loaded with plastic scrap recovered from the battery crushing system. The following diagram was supplied by the applicant:

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

| | |
|-----------------------------|---------------------------|
| PAGES 8 | PAGE 4 |
| APPL. NO see p. 1 | DATE 05-02-2012 |
| PROCESSED BY MAP | CHECKED BY |



The truck tunnel enclosure will be attached to the RMPS building. A roll-up door located on the entrance of this building (not depicted in this illustration) will be maintained closed while the truck trailer is being loaded.

EVALUATION

CEQA

There are no emissions increases resulting from the proposed alterations and change of conditions. Therefore a CEQA evaluation is not required in this case.

RULE 212

There are no emissions increases and no increases in health risk resulting from the proposed alterations and change of conditions. Therefore a Rule 212 public notice is not required in this case.

RULE 401

Operation of the subject equipment is not expected to cause visible emissions in excess of the limits in this rule. Therefore, compliance is expected.

RULE 402

Since the process equipment is vented to baghouses and scrubbers at this facility, nuisance complaints due to dust and odors is not expected during normal operation of the subject equipment at this facility. Any nuisance complaints resulting from process upset conditions (if any) will be handled by AQMD Compliance staff.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS

| | |
|-----------------------------|---------------------------|
| PAGES 8 | PAGE 5 |
| APPL. NO see p. 1 | DATE 05-02-2012 |
| PROCESSED BY MAP | CHECKED BY |

RULE 404

Previous evaluations have shown compliance with the particulate concentration limits in this rule.

RULE 405

Previous evaluations have shown compliance with the particulate emission limits in this rule.

RULE 1401

There is no health risk increase resulting from this set of applications. Therefore, compliance with this rule is expected.

RULE 1420

Previous source tests have demonstrated that all APCS equipment at this facility has at least 98% control efficiency on lead emissions.

RULE 1420.1

This facility is in compliance with all applicable requirements in this rule. The new truck tunnel enclosure will enhance compliance with the 0.15 ug/m³ ambient lead concentration limit at the fence lines of this facility required by this rule. The new building extension will comply with negative pressure requirements and housekeeping requirements in this rule.

40CFR60 Supart X (LEAD NESHAP)

The RMPS building at this facility is equipped with negative pressure differential gauges to ensure compliance with the total enclosure negative pressure requirements in this rule. The APC systems have been previously tested and found to be in compliance with the lead concentration limits in this rule. Therefore, compliance with the lead NESHAP has been demonstrated.

REGULATION 30, TITLE V

Since the new building extension will not result in any emission increases, the current modification is considered to be a Title V minor permit revision under this regulation.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

| | |
|-----------------------------|---------------------------|
| PAGES 8 | PAGE 6 |
| APPL. NO see p. 1 | DATE 05-02-2012 |
| PROCESSED BY MAP | CHECKED BY |

CAM

CAM requirements pertain to the requirements of 40 CFR 64, Continuous Assurance Monitoring. The CAM rule contains specific federal monitoring requirements for process equipment which is vented by air pollution control systems where the facilities which are major sources, as defined in Title V (Reg 30). Permit conditions currently ensure compliance with CAM requirements. The following APC systems in operation at Exide are subject to CAM requirements. These APC systems have the following conditions associated with them:

| APCS | Device ID | REQUIRED CONDITIONS |
|--|------------------|---|
| APCS #1 Reverb furnace baghouse | C40, C41 | C6.3, D12.5, D12.6, D12.11, D381.1, E102.1, E193.1, H116.1, H116.2, H116.4, K67.2 |
| APCS #2 Blast furnace baghouse | C45 | C6.3, D12.5, D12.6, D12.11, D381.1, E102.1, E193.1, H116.1, H116.2, H116.4, K67.2 |
| APCS #5 Hard lead (pot furnace) baghouse | C46 | D12.6, D12.7, D12.10, D12.11, D381.1, E102.1, H116.1, H116.2, H116.4, K67.3, E193.1 |
| APCS #6 Soft lead (pot furnace) baghouse | C47 | D12.6, D12.7, D12.10, D12.11, D381.1, E102.1, H116.1, H116.2, H116.4, K67.3, E193.1 |
| Rotary dryer baghouse | C144 | C6.2, D12.5, D12.6, D381.1, E102.1, E193.1, H116.1, H116.2, H116.4, K67.2 |
| Blast/Reverb Furnace Common Stack Outlet | S139 | A63.1, D82.1, D323.1, K67.9 |

DISCUSSION

There are no emission increases expected with regards to the subject permit applications. The conversion of the RMPS building to a total enclosure is expected to result in a decrease in fugitive emission levels. This decrease is not quantifiable. However, the effects of this change should become apparent in the lead concentration data produced by the ambient air monitors surrounding this facility.

Permit conditions are required to ensure compliance with all applicable Rules and Regulations.

RECOMMENDATION

APPLICATION NO. 533201

Approve Title V Facility Permit modification

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS

| | |
|-----------------------------|---------------------------|
| PAGES 8 | PAGE 7 |
| APPL. NO see p. 1 | DATE 05-02-2012 |
| PROCESSED BY MAP | CHECKED BY |

APPLICATION NO. 533202

Approve Title V Facility Permit modification

Issue Permit to Construct subject to the following Facility Permit modifications and change of conditions in Section H::

1. Add new devices, modify device descriptions, add device connections, and add new permit conditions as indicated in the tables below for the described Processes and Systems:

(Note: additions and changes are shaded and indicated in bold type)

APPLICATION NO. 533202 RMPS BUILDING ENCLOSURE AND MODIFICATION OF APC 9

| Equipment | ID No. | Connected To | RECLAIM Source Type/ Monitoring Unit | Emissions* And Requirements | Conditions |
|--|-------------|------------------------------------|--------------------------------------|--|---------------|
| Process 1: SECONDARY METALS, LEAD SMELTING PROCESS | | | | | |
| System 1: RAW MATERIAL PREPARATION SYSTEM (RMPS) | | | | | |
| ENCLOSURE, BUILDING, RAW MATERIAL PREPARATION SYSTEM, 125 FT W. X 329 FT L. X 75 FT H., APPROXIMATE DIMENSIONS WITH A/N: 533202 | C175 | C156 C157 C165 C191 | | LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986] | E448.2 |
| ENCLOSURE, BUILDING, TRUCK LOADING AND UNLOADING, 21 FT W. X 41 FT L. X 17 FT. H., APPROXIMATE DIMENSIONS | C191 | C175 C156 C157 C165 | | LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986] | E448.2 |

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS

| | |
|----------------------|--------------------|
| PAGES 8 | PAGE 8 |
| APPL. NO see p. 1 | DATE 05-02-2012 |
| PROCESSED BY MAP | CHECKED BY |

2. Add the following new or modified permit conditions to Section H:

(MODIFIED)

E448.2 The operator shall comply with the following requirements:

Exide shall install and maintain at least three (3) separate pressure differential monitoring systems inside the Total Containment Building so as to measure the negative pressure differential between the internal building atmosphere and the external atmosphere at all times. Each of these systems shall be operated pursuant to the following requirements:

- A. Each building pressure differential monitoring system shall be equipped with a continuous chart recorder.
- B. A minimum of one (1) building pressure differential monitoring system shall be installed at each of the following three (3) walls in the Total Containment Building.
 - 1. Leeward wall inside of the Total Containment Building in accordance with 40 CFR 63 Subpart X.
 - 2. The inside wall of the building opposite the leeward wall.
 - 3. An inside wall location defined by the intersection of a perpendicular line between this wall and within plus or minus ten (10) meters of the midpoint of a straight line between the two other monitors described in Subparts (B)(1) and (B)(2) of this condition. For the purpose of this condition, the midpoint monitor shall NOT be located on the same walls as any of the other two monitors described in this condition.
- C. The total open area of the RPMS total enclosure building shall not exceed 72.9 square feet, except for: solid doors opened during ingress and egress of personnel, and, the maintenance door opened during transport of equipment used for repairs.
- D. The outer door on the truck enclosure attached to the RMPS building shall remain closed at all times except for periods of ingress and egress of trucks, trailers, equipment and/or personnel. The outer door on the truck enclosure shall remain closed throughout all periods of cargo loading and/or unloading.**
- E. The internal floor area, internal surfaces, and external surfaces, of the truck enclosure attached to the RMPS building shall be maintained visibly free of lead contamination, to the maximum extent possible, pursuant to all applicable requirements in the Rule 1420 plan for this facility and with all applicable requirements in Rule 1420.1.**

[RULE 1420, 9-11-1992; **RULE 1420.1, 11-5-2010**]

[Devices subject to this condition : C175, C191]