

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

PAGES 17	PAGE 1
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

P/C & Plan

COMPANY NAME AND ADDRESS

Quemetco, Inc.
720 South Seventh Avenue
City of Industry, CA 91746

ID 8547
mailing and equipment address

EQUIPMENT DESCRIPTION

APPLICATION NO. 488106

TITLE V FACILITY PERMIT REVISION

APPLICATION NO. 488107

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. BAGHOUSE NO. J, BUSCH INTERNATIONAL, MODEL MRV80, 11'-4"W. X 24'-7"L. X 19'-9"H., WITH 196 FILTER BAGS, EACH 0'-6-1/4"DIA. X 13'-0"L., AND WITH 25 HEPA FILTERS, EACH 2'-0"W. X 1'-0"L. X 2'-0"H., PULSE JET CLEANED.
2. EXHAUST SYSTEM WITH A 100-H.P. BLOWER VENTING THE BATTERY WRECKER PARTIAL ENCLOSURE BUILDING.

APPLICATION NO. 488108

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. BAGHOUSE NO. K, BUSCH INTERNATIONAL, MODEL MRV80, 11'-4"W. X 24'-7"L. X 19'-9"H., WITH 196 FILTER BAGS, EACH 0'-6-1/4"DIA. X 13'-0"L., AND WITH 25 HEPA FILTERS, EACH 2'-0"W. X 1'-0"L. X 2'-0"H., PULSE JET CLEANED.
2. EXHAUST SYSTEM WITH A 100-H.P. BLOWER VENTING THE BATTERY WRECKER PARTIAL ENCLOSURE BUILDING.

APPLICATION NO. 488109

RULE 1420 COMPLIANCE PLAN

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

PAGES 17	PAGE 2
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

HISTORY

Application Nos. 488106-9 were received on 9/23/2008. A/N's 488107 and 488108 were received as Class I and are for Permits to Construct two room ventilation baghouses. Subsequently, Quemetco requested cancellation of one of the baghouse applications due to a change in construction plans. The proposed baghouse is new construction with no prior history.

A/N 488106 is the Title V Revision application which will be used to update the Title V permit pursuant to the requested changes. A/N 488109 is submitted for a revision to the existing Rule 1420 compliance plan letter by the deletion of obsolete permit condition references to a previous ambient monitoring station which is no longer present. The previous Rule 1420 compliance plan was issued on 9/14/2007 under A/N 471357.

PROCESS DESCRIPTION

BACKGROUND

Some sources of lead emissions in the SCAQMD currently have fence-line lead concentrations which vary in the approximate range of 0.1 to 1.5 $\mu\text{g}/\text{m}^3$. An average range would be closer to 0.5 to 0.7 $\mu\text{g}/\text{m}^3$, (30 day averages.)

However, on October 15, 2008, EPA substantially strengthened the national ambient air quality standards (NAAQS) for lead. The revised standards are 10 times more stringent than the previous standards.

EPA has revised the level of the primary (health-based) standard from 1.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), to 0.15 $\mu\text{g}/\text{m}^3$, measured as total suspended particles (TSP). EPA has revised the secondary (welfare-based) standard to be identical in all respects to the primary standard.

Estimated Timeline for Implementing Revised Standards

- States are required to make recommendations for areas to be designated attainment, nonattainment, or unclassifiable by October 2009.
- Final designations of all attainment, nonattainment and unclassifiable areas will be effective no later than January 2012. However, EPA intends to complete initial designations as soon as possible where data are sufficient from existing monitoring network.
- States are required to submit State Implementation Plans outlining how they will reduce pollution to meet the standards no later than June 2013.
- States are required to meet the standards no later than January 2017.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

PAGES 17	PAGE 3
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

In addition, the AQMD is in the process of amending Rule 1420, and proposing Rule 1420.1, to be compatible with the new standards. These rules may have compliance date requirements significantly sooner than the EPA NAAQS for lead.

CURRENT PROJECT

Quemetco is aware of the forthcoming NAAQS requirements and is taking steps to comply with the new standards.

The proposed baghouse is intended to control fugitive emissions from equipment which is already controlled. These baghouses are therefore, in essence, "housekeeping" baghouses. These baghouses may result in an overall reduction in emissions of air contaminants in some instances. However, in the worst case, they are expected to produce an insignificant emissions reduction.

The new baghouse will control fugitive emissions from a new building which is proposed to enclose the entire operation of the battery wrecking and conveying system. This additional enclosure is intended to assist in compliance with new, more stringent standards in the National Ambient Air Quality Standard for lead (Pb NAAQS).

Subsequent to the original submittal, Quemetco revised building plans resulting in a smaller building. The original proposal was to vent a soda ash silo in addition to the battery breaking equipment. The final plan is to vent only the battery breaking equipment. As a result, only one baghouse is proposed. Quemetco has requested cancellation of the application for the second Busch baghouse.

The subject equipment is operated 24 hours/day, 7 days/week and 52 weeks/year.

CALCULATIONS

GIVEN: _____

Applicant's Data

For each baghouse:

Max exhaust blower capacity: 50,000 CFM
Filter bag dimensions: Dia. = 6.25 inches
L. = 13.0 feet
N. = 196

operating schedule: 24 hours/day
7 days/week
52 weeks/year

CALCULATIONS

1. Air-to-cloth ratio (AR)

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS

PAGES 17	PAGE 4
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

AR (each baghouse) = (CFM)/(N)(3.14159)(D)(L)
 AR = (50,000 ft³/min)/(196)(3.14159)(0.5208 ft)(13.0 ft)
 AR = 12.0 ft/min

2. Previous Rule 1420 source test data on existing room ventilation baghouses.

RECLAIM DEVICE ID	PERMIT NO.	QUEMETCO ID	TEST REPORT ID	TEST DATE	RUN NO.	INLET LEAD CONC. ug/M ³	OUTLET LEAD CONC. ug/M ³	INLET LEAD EMISSIONS LBS/HR	OUTLET LEAD EMISSIONS LBS/HR	CONTROL EFF. PERCENT	AVERAGE CONTROL EFF. PERCENT	OUTLET EXHAUST DSCFM
C26	RD37224	00FA	A	8/21/1997	A1	1179	32	0.1548	0.0044	97.158		36338
				8/21/1997	A2	64	3	0.0084	0.0005	94.048		38736
				8/22/1997	A3	46	2	0.0059	0.0003	94.915	95.37	37897
C27	RD37225	00FB	B	8/22/1997	B1	74	3	0.0092	0.0004	95.652		37513
				8/25/1997	B2	150	26	0.0187	0.0035	81.283		35229
				8/25/1997	B3	197	2	0.0246	0.0003	98.780	91.91	37302
C28	RD37226	00FC	C	6/10/1997	C1	1369	8	0.1700	0.0009	99.471		32052
				6/11/1997	C2	4241	3	0.5274	0.0004	99.924		32311
				9/28/1997	C3	2825	13	0.3496	0.0016	99.542	99.65	32337
C29	RD37227	00FD	D	8/18/1997	D1	12603	4	1.5615	0.0005	99.968		33164
				8/19/1997	D2	8889	150	0.9571	0.0183	98.315		29169
				8/20/1997	D3	1442	2	0.1818	0.0002	99.890	99.39	32398
C32	D49303	00DA	E	9/22/1997	E1	3955	107	0.5592	0.0183	96.727		45450
				9/23/1997	E2	6798	15	0.9528	0.0025	99.738		44682
				9/24/1997	E3	4038	18	0.5894	0.0025	99.561	98.68	42430
C30	D49301	00DB	F	6/16/1997	F1	2248	9	0.3247	0.0014	99.569		40292
				6/17/1997	F2	844	8	0.1049	0.0008	99.237		36402
				6/18/1997	F3	1349	4	0.1901	0.0008	99.684	99.50	40831
C31	D49302	00DC	G	9/17/1997	G1	3197	289	0.3548	0.0408	88.501		37696
				9/18/1997	G2	2836	14	0.2917	0.0020	99.314		39170
				9/19/1997	G3	4230	10	0.4854	0.0016	99.670	95.83	42770
C33	D67377	00BE	H	9/15/1997	H1	940	13	0.1559	0.0024	98.461		49862
				9/15/1997	H2	1755	23	0.2821	0.0043	88.476		49082
				9/16/1997	H3	1321	11	0.1924	0.0019	99.012	98.65	46468
C34	D67378	00BW	I	9/23/1997	I1	163	13	0.0214	0.0014	93.458		30232
				9/24/1997	I2	629	184	0.0809	0.0212	73.795		30777
				9/25/1997	I3	725	18	0.0814	0.0020	97.543	88.27	30120

Note: For triplicate runs in which the average control efficiency was less than 98%, the AQMD source test evaluation group approved either single runs with an efficiency of 98 %, and/or re-runs of tests which demonstrated compliance with the performance standards in Rule 1420. The periodic low numbers are due to low inlet grain loading. Since the control efficiency is demonstrated to be 98 % with sufficient grain loading and since each baghouse is equipped with HEPA filters, each of these control systems is considered to be TBACT and would therefore qualify for an AECM approval in Rule 1407, if necessary. (see John Higuchi memo dated 6/25/1999 in A/N 488106.)

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

PAGES 17	PAGE 5
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

EVALUATION

RULE 212

Since this project will not result in an emissions increase and since this facility is not located within 1,000 feet from the outer boundary of a school, public notice pursuant to Rule 212 is not required.

RULE 401

Due to the nature of this equipment, visible emissions are not expected. Therefore, compliance with this rule is expected.

RULE 402

The proposed baghouse will reduce emissions of toxic air contaminants in certain cases. Since there are no emissions increases, nuisance problems are not anticipated. Therefore, compliance with this rule is expected.

RULE 404

Since the subject baghouses will be used for general room ventilation, the exhaust gas particulate concentrations are expected to be diminimus. Therefore, compliance with this rule is expected.

REGULATION XIII

A diminimus decrease in particulate emissions is expected as a result of the installation of the subject baghouses. Therefore, Regulation XIII is not applicable in this case.

BACT

Since there is no increase in air contaminants, a BACT evaluation is not required in this case.

RULE 1407

Based on the drawings submitted, it appears that the new building will be a separate structure made of corrugated sheet metal which is separate from the concrete walled main structure at Quemetco which is a total enclosure. Since metallurgical fumes from lead melting are separated from this new structure, Rule 1407 does not apply in this case.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

PAGES 17	PAGE 6
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

RULE 1420

This facility emits more than 0.5 lbs/day of lead emissions. Therefore, this rule requires a minimum control efficiency of 98 percent on lead or 99 percent on total particulates. The existing room ventilation baghouses have been previously demonstrated to comply with the 98 percent lead control performance standard. Therefore, the new baghouse is also expected to comply with this standard.

Rule 1420 (d) requires that the ambient lead concentration at or beyond the fence line of this facility does not exceed 1.5 ug/m³ on a 30 day average. This facility is currently in compliance with this requirement. Construction of the new enclosure will enhance the ability to comply with this requirement.

GRANT 105

Since there are no increases of PM emissions from this project, the Grant 105 permit conditions are not required in this case.

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).

APPLICABLE PERMIT CONDITIONS

The following permit conditions will ensure compliance with CAM requirements:

The actual details of the normal baghouse operation designed to comply with Rules 1407, 1420, and the lead NESHAP have been implemented in the Rule 1407 and Rule 1420 plan conditions and in the Facility Permit for this facility. Specifically, the following items are noted:

1. Section J of the Facility Permit contains an itemized list of NESHAP requirements that Quemetco has to comply with, including permit conditions to maintain the SOP's required by sections 63.545 and 63.548 of the lead NESHAP.
2. Sections D and H of the Facility Permit contain specific operating conditions regarding the baghouses at this facility. These conditions have the following functions:

CONDITION	REQUIREMENTS
Plan letter	Rule 1420 requirements attached to Facility Permit
F16.2	Rule 1407 requirements
C6.1, C6.2	baghouse operating temperature limits
D12.1	differential pressure gauges
D12.5	broken bag detectors
D12.9	exhaust gas flow meters

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

PAGES 17	PAGE 7
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

D323.1	visible emission inspection required if public complaint of visible emissions is made
D381.1	prevention of visible emissions
E102.1	discharge dust enclosed containers
E193.1	CAM requirements (40CFR Part 64)
H116.2	Industrial Ventilation standards for exhaust systems
H116.3	compliance of bag leak detection systems with lead NESHAP requirements
K67.2	records of bag leak detector calibrations and calibration protocol, and records from baghouse inlet temperature gauges

3. The following baghouses in operation at Quemetco are subject to CAM requirements. These baghouses have the following conditions associated with them:

BAGHOUSE ASSIGNMENT	Device ID	REQUIRED CONDITIONS
Rotary Dryer Kiln Reverberatory Furnace Slag Furnace	C35, C39, C88	F16.2, C6.1, D12.1, D12.5, D12.9, D381.1, E102.1, E193.1, H116.2, H116.3, K67.2

In addition, the furnaces of D3, D8, and D84 are subject to condition no. D182.4, periodic source testing requirements for ROG, CO, PM, PM10, and lead.

The CAM Plan has been approved under A/N 436957.

Although there are some overlapping conditions, (D12.1, D381.1, and E102.1), it has previously been determined that the CAM requirements do not apply to the room ventilation baghouses at this facility.

40CFR63 Subpart X

The lead NESHAP requirements regarding the subject equipment are:

1. Exhaust concentration limit of 2.0 mg/DSCM regarding the room ventilation baghouse.
2. Wet suppression and washing of the floor area around the battery breaking equipment.

Permit conditions will ensure compliance with these requirements. Source tests will be required for the new baghouse to demonstrate compliance with the lead concentration limit, as well as the 98% lead performance standard in Rule 1420.

DISCUSSION

The subject equipment is expected to operate in compliance with all of the applicable rules and regulations of the SCAQMD.

Emissions reduction credit associated with permitted controlled equipment has already been accounted for under the respective applications for the permitted air pollution control systems

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

PAGES 17	PAGE 8
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

directly venting this equipment. Fugitive emissions from specific pieces of permitted equipment are considered to be diminimus based on previous observations and calculations. Therefore, it is concluded that negligible emissions reduction credit is attributable to the proposed baghouses. However, since the subject baghouses will reduce air contaminants, even if it is a diminimus amount, they require permits to construct and operate pursuant to Rules 201 and 203. Finally, it should be noted that over a long period of time, the proposed project may produce a net reduction in the health risk to the public by helping to lower the ambient air concentrations of arsenic and lead emissions from this facility.

The air-to-cloth ratio of the subject baghouses is 12.0:1. The maximum recommended air-to-cloth ratio for a pulse jet baghouse is 8.0:1. However, since these baghouses will not be venting specific equipment items and the grain loadings will be very small, problems due to rapid filter bag wear, blinding, and/or high pressure drop are not expected.

The minimum control efficiency requirement under Rule 1420 is 98 percent for lead. The existing room ventilation baghouses previously have been demonstrated to comply with Rule 1420. Based on previous source tests the new and existing baghouses are expected to operate in compliance with Rule 1420.

Based on the drawings submitted, it appears that the new building will be a separate structure made of corrugated sheet metal which is separate from the concrete walled main structure at Quemetco which is a total enclosure. Since metallurgical fumes from lead melting are separated from this new structure, Rule 1407 does not apply in this case.

Quemetco has indicated that the subject building will only be a partial enclosure. Drawings submitted indicate that the building has many large bay doors along the east side of the proposed building. It is unknown as to whether these doors will be open or closed during normal operations. Future Rule 1420 requirements may require a "total enclosure" type of building. However, the current proposal is, in essence, for a "partial enclosure."

There is no requirement currently in Rule 1420 or in the lead NESHAP requiring a total enclosure around the battery breaking area. The only requirement in the NESHAP is for the special case where a "total" enclosure is used in conjunction with the battery breaking area (i.e., 2.0 mg/m³ lead concentration limit from any gases released from a total enclosure building.)

Since the proposed building is only a partial enclosure, the requirements for negative pressure monitoring are not required with regards to this new building. If future Rule 1420 amendments require a "total enclosure", then pressure differential gauges will be required, and negative pressure requirements will apply.

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

PAGES 17	PAGE 9
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

RECOMMENDATION

APPLICATION NO. 488106

Approve TV Permit Modification

APPLICATION NO. 488108

Cancel per applicant's request - with no refund (per Rule 301).

APPLICATION 488109

Approve Rule 1420 plan subject to the following conditions.

APPLICATION NOS. 488107

Issue Permit to Construct subject to the following modifications:

1. Add Process 1, System 6 to Section H: (FUGITIVE DUST CONTROL SYSTEM)
2. Add Devices C168 and C169 to Process 1, System 6 in Section H:

Device	A/N	Process 1, System 6: New Device Description
C168	488107	BAGHOUSE NO. J, BUSCH INTERNATIONAL, MODEL MRV80, 11'-4"W. X 24'-7"L. X 19'-9"H., WITH 196 FILTER BAGS, EACH 0'-6-1/4"DIA. X 13'-0"L., AND WITH 25 HEPA FILTERS, EACH 2'-0"W. X 1'-0"L. X 2'-0"H., PULSE JET CLEANED, WITH A 100-H.P. BLOWER
C169	488107	ENCLOSURE BUILDING, 90' W. X 180' L. X 54' H. APPROXIMATE DIMENSIONS, BATTERY BREAKING AREA.

3. Add Device Connections in Section H

C168 to: C169, C2, C109, D1, D112, D113, D115, D116, D117, D118, D119, D120, D121, D122, D123, D124, D125, D126, D127, D128, D129, D130, D131, D132, D133, D134, D135, D136, D137

4. Add new and existing conditions to Devices C168 and C169 in section H as follows:

D12.1 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the bags, in inches water column.
[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]
[Devices subject to this condition: C168]

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

PAGES 17	PAGE 10
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

D12.14 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the HEPA filters, in inches water column.

The static pressure differential across the HEPA filters shall not exceed 3 inches of water column.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; 40CFR 63 Subpart X, #02, 6-23-2003]

(NEW CONDITION)

[Devices subject to this condition: C168]

D182.9 The operator shall test this equipment in accordance with the following specifications:

- A) The test(s) shall be conducted and a written report submitted to the AQMD not later than 180 days of initial installation of the new room ventilation baghouses.
- B) The test(s) shall measure the emissions of lead at the inlet and outlet of each baghouse. Triplicate source tests shall be conducted simultaneously on the inlet and outlet of each baghouse in accordance with the requirements set forth by Rule 1420 (e)(2).
- C) Triplicate source tests shall be conducted for exhaust gas lead concentration in each baghouse outlet, pursuant to 40CFR 63 Subpart X. The outlet tests in part B of this condition may be used to fulfill this requirement if equivalency in testing methods can be demonstrated to satisfy the requirements of both rules.
- D) The tests shall be conducted while the batter wrecking and conveying system is operated under normal operating conditions.
- E) The source tests shall be performed by a qualified testing laboratory, conducted in accordance with acceptable district procedures and monitored by a district representative.
- F) The rule 1420 source tests shall be conducted by a qualified testing contractor approved for Rule 1420 testing.
- G) Written notice shall be provided to the AQMD at least 10 days prior to testing so that an AQMD observer may be present during the tests.
- H) Sampling facilities shall comply with the attached district "guidelines for the construction of sampling and testing facilities", pursuant to rule 217.

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

PAGES 17	PAGE 11
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

- D) Written results shall be submitted to the AQMD within 60 days after testing.
[RULE 1420]
[Devices subject to this condition: C168]

D381.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarterly period. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions; and
- 3). Date and time visible emission was abated.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 401, 3-2-1984; RULE 401, 11-9-2001; 40CFR 60 Subpart L, 12-3-1976; 40CFR Part 64, 10-22-1997]
[Devices subject to this condition: C168, C169]

E102.1 The operator shall discharge dust collected in this equipment only into closed containers.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

(NEW CONDITION)

[Devices subject to this condition: C168]

E448.3 The operator shall comply with the following requirements:

- A. A minimum of one (1) room ventilation baghouse shall be in full operation at any time that the battery wrecking and conveying system is in operation.
- B. 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.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

PAGES 17	PAGE 12
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

- C. 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.

[RULE 1420]

[Devices subject to this condition: C168]

- K67.6 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

The pressure drop across the HEPA filter system shall be monitored and recorded daily.

[40CFR 63 Subpart X, #02, 6-23-2003; 40CFR Part 64, 10-22-1997]

(NEW CONDITION)

[Devices subject to this condition: C168]

- K171.5 The operator shall provide to the District the following items:

- A) Two (2) copies of the test plan shall be submitted to the AQMD Refinery and Waste Management Permitting Unit, Engineering and Compliance, not less than 60 calendar days prior to the initial test date and shall be approved by the AQMD before the tests commence. The plan shall include the proposed operating conditions of the equipment during each test run.
- B) The total amount, in tons, of all materials charged to the batter wrecking and conveying system during each test run shall be recorded. The measuring period for determining the process weight of throughputs shall include the period during which the test run occurred. This requirement shall apply to each test run.
- C) A test plan shall be submitted for district approval, and it shall include the following:
1. The identity of the testing laboratory.
 2. A statement from the testing laboratory certifying it meets the criteria in District Rule 304 (k).
 3. A list of contaminants to be tested.
 4. Testing procedures for each contaminant and a description of all sampling and analytical procedures to be used.
 5. Location of points of sampling.
 6. Quality assurance measures.
 7. Experience in testing procedures.
 8. Date(s) and time(s) of commencement of the test(s).

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

PAGES 17	PAGE 13
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

- D) The source tests shall be completed and a final report submitted to the AQMD Refinery and Waste Management Permitting Unit, Engineering and Compliance, not later than 180 days after construction of the battery breaking area Partial Enclosure Building, and the associated baghouse, is completed.

[RULE 1420]

[Devices subject to this condition: C168]

APPLICATION NO. 488109

RULE 1420 COMPLIANCE PLAN LETTER

- 1) Operation of this facility shall be conducted in accordance with all data and specifications submitted with the application under which this plan approval is issued unless otherwise noted below.
- 2) The equipment shall be properly maintained and kept in good operating condition at all times.
- 3) The operation of this facility shall comply with the emission standards for Rule 1420, including, but not limited to, the maintenance of records required to demonstrate compliance with the following conditions, pursuant to the Rule 1420 Compliance Plan for this facility.
- 4) Fugitive lead-dust emissions shall be controlled by the housekeeping practices specified in the Rule 1420 compliance plan.
- 5) Ambient air lead monitoring shall be performed to measure lead concentration at the fence line of this facility in accordance with a protocol approved by the AQMD.
- 6) Quemetco shall maintain and operate not less than four (4) separate monitoring stations at specific locations at the fence line of this facility in accordance with a protocol approved by the AQMD.
- 7) The ambient air lead monitoring shall be performed not less than once every 6 days.
- 8) The daily data produced by the monitoring stations owned and/or operated by Quemetco, or by a contractor hired by Quemetco to monitor ambient lead concentration, shall be submitted to the AQMD on a monthly basis, no later than the 21st day of each following month.
- 9) The ambient air lead monitoring shall be continued indefinitely unless written authorization is received from the AQMD to discontinue the monitoring.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

PAGES 17	PAGE 14
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

- 10) Quemetco shall locate and operate the ambient air lead monitoring stations according to the following specifications:
- A. For the purpose of this condition, the perimeter fence lines of the Quemetco facility shall be defined according to the nomenclature described in the diagram located in Attachment 'A' which is part of this plan.
 - B. For the purpose of this condition, the "Process Facility East Fence line" shall be defined as the East boundary of the Quemetco City of Industry property which separates lead recycling land use from non-lead recycling land use.
 - C. The operator shall maintain and operate a minimum of four (4) ambient lead monitoring stations at location numbers 1, 2, 4 and 5. Location no. 3 is optional. The following table defines these monitoring locations:

Monitoring Location ID Number	Monitoring Fence line	Distance of Monitoring Station From Property Corner
1 (required)	North Fence line: Located Between North and East corners of property adjacent to San Jose Creek	99 ± 10 meters from East corner of facility
2 (required)	East Fence line: Located Between East and South corners of property adjacent to Process Facility East Fence line	101 ± 10 meters from East corner of facility
3 (optional)	East Fence line: Located Between East and South corners of property adjacent to Process Facility East Fence line	41 ± 10 meters from South corner of facility
4 (required)	South Fence line: Located Between South and West corners of property adjacent to East Salt Lake Avenue	58 ± 10 meters from South corner of facility
5 (required)	West Fence line: Located Between West and North corners of property adjacent to South 7th Avenue	10 ± 10 meters from North corner of facility

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

PAGES 17	PAGE 15
APPL. NO See p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

- 11) Each operating day, Monday through and including Friday, the sanitation crew shall wash down all surface areas from the scale house through and including the paved former surface impoundment area, hereafter referred to as the "Wash down Area." Each operating day, Monday through and including Sunday, the sanitation crew shall operate the Facility's mobile sweeper to clean all concrete and asphalted traffic areas, including the Wash down Area, finished goods warehouse and refinery areas to the maximum extent practicable. The operation of the mobile sweeper shall be performed so as to prevent injury to employees or damage to property. In the event that the mobile sweeper is not operating as described above, the crew shall perform an additional complete wash down of the Wash down Area. The foregoing wash down and mobile sweeper obligations may not be performed during rainy day(s). In the event an upset condition prevents wash down or use of the mobile sweeper, the Facility Environmental Manager shall prepare a report documenting the upset condition and shall maintain the report in his/her monitoring file.
- 12) On a daily basis, Monday through Sunday, the sanitation crew shall walk around the perimeter of the Facility picking up trash, debris and shall report immediately any environmental problems such as spills of any toxic or hazardous materials, pursuant to the Quemetco's Environmental Health & Safety Policy.
- 13) Throughout each operating day, as appropriate and necessary, the sanitation crew shall spot clean all traffic areas using a bucket and wet mop approach, as well as wet mop-cleaning immediately outside all office areas.
- 14) At least one time each operating day, the sanitation crew shall inspect, and as necessary, empty and clean out all drums containing Personal Protective Equipment (PPE).
- 15) All staff responsible for compliance with Rule 1420 Housekeeping requirements shall receive training in all of the Rule 1420 Housekeeping requirements before commencing Rule 1420 Housekeeping duties, and once per year thereafter.
- 16) Slag shall only be unloaded from railcars within an enclosed dock with the passageway between the enclosed dock and railcar draped with plastic to protect against the escape of dust during unloading operations. A supervisor shall ensure that this condition is met, and shall make a written note confirming that the condition has been met during unloading operations.
- 17) Any employee who will be engaged in slag loading and unloading operations shall be specifically trained in proper loading, unloading and clean-up practices prior to the employee's engaging in actual slag loading and/or unloading operations.
- 18) The building to which the railroad dock is connected shall be kept under negative pressure and, to the maximum extent possible the plastic-enclosed dock area, referred to

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

PAGES 17	PAGE 16
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

above in condition 16, shall also be kept under negative pressure. No traffic shall be allowed to interfere with the dock area during loading and unloading operations.

- 19) The loading of slag into end-dump trailers shall normally occur inside a ventilated building. Slag shall be wetted prior to loading if loading is to be conducted outside a ventilated building.
- 20) The battery wrecker ground area shall be washed down every shift that it is operated. The ground area washed shall include the floor area inside the battery wrecker Partial Enclosure Building. The dry fog suppression system shall be operated when the battery wrecker is in operation. The battery wrecker scrubber exhaust shall discharge only into the facility Total Containment Building.
- 21) Once every 12 months following completion of construction of the battery wrecker Partial Enclosure Building, all surfaces (vertical, horizontal, or otherwise) inside the battery wrecker Partial Enclosure Building shall be visually inspected for accumulation of lead dust and/or residues and, if found, shall be wet washed and/or removed using a wet cleaning method. The operator shall keep adequate records to demonstrate compliance with this requirement and the records shall be maintained on site for five years and made available to AQMD personnel upon request.
- 22) Equipment shall be decontaminated or containerized prior to leaving a ventilated building.
- 23) Wet suppression practices shall be employed where dust generation potential exists while performing a maintenance or operations activity.
- 24) Materials such as blocks of furnace bullion which may have the potential of generating minor amounts of dust shall, if stored outside, be covered with plastic or otherwise tarped.
- 25) During any demolition operations, the material being demolished shall be adequately wetted down to suppress dust generation.
- 26) Quemetco shall investigate any ambient air lead monitoring result that exceeds 1.0 micrograms lead per cubic meter of air at any fence line monitor during any monitoring cycle. The Facility Environmental Manager shall keep the results of the investigation in his/her monitoring file and shall include such report in the monthly report to the AQMD.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**ENGINEERING AND COMPLIANCE
APPLICATION PROCESSING AND CALCULATIONS**

PAGES 17	PAGE 17
APPL. NO see p. 1	DATE 11-13-2009
PROCESSED BY MAP	CHECKED BY

- 27) The operator shall keep adequate records to verify the following:
- A. Quantities of each lead-containing material processed, and the lead content of the material, including purchase records, usage records, results of analysis or other verification to indicate lead content and lead usage, updated annually.
 - B. Housekeeping activities completed, and inspection and maintenance of emission collection system(s) and control device(s), including the name of the person performing the activity, and the dates on which specific activities were completed.
 - C. Records from the ambient air lead monitoring stations.
 - D. The records shall be retained for a period of five years, and shall be made available to the AQMD upon request.