

# South Coast Air Quality Management District

## Statement of Basis

### Proposed Title V Renewal Permit

**Date:** January 26, 2011

**Facility Name:** Exide Technologies  
**Facility ID:** 124838  
**SIC Code:** 3341  
**Equipment Location:** 2700 South Indiana Street  
Vernon, CA 90058

**Application #(s):** 436746  
**Application Submittal Date(s):** 11/10/2004

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#### 1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004 (f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. CO, NO<sub>2</sub>, SO<sub>2</sub>, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of Exide Technologies located at 2700 South Indiana Street, Los Angeles, CA. This facility is subject to Title V requirements because it is a major source and is subject to certain NSPS (New Source Performance Standards) and NESHAP (National Emission Standards for Hazardous Air Pollutants) requirements.

**2. Facility Description**

This is an existing facility that is in the business of recycling lead acid batteries. This facility is operating a battery crushing and material separation system, rotary dryer furnace, reverberatory furnace, cupola furnace, refining pot-type furnaces, scrubbers, baghouses, and dust collectors. The metallurgical furnaces are enclosed in a building which is vented to two room ventilation dust collectors. This facility receives spent (used) lead-acid batteries and other lead-bearing materials and recycles them by recovering lead and plastic battery case material. The sulfuric acid from the batteries is also treated and recycled by use of the facility’s wastewater treatment system and the treated liquid is discharged into the sewer.

**3. Construction and Permitting History**

Exide Technologies is located in the city of Vernon, on approximately 24 acres of land. The parcel is zoned for heavy Industrial (Zone M-2) and other parcels in the vicinity are zoned either Manufacturing or Commercial. There is no residential zoning within a quarter mile radius of the site.

The facility has been used for a variety of metal fabrication and metal recovery operations since 1922. Previous owners include Morris P. Kirk & Sons Inc., Gould Inc. (Gould), and GNB, Inc. The primary use has been lead-acid battery recycling since the late 1970's.

Numerous permits to construct and permits to operate have been issued to the Exide facility. For the current owner (Exide), this began following the change of ownership which occurred around the year 2,000. An initial Title V permit was issued to the facility on August 1, 2002 (Revision 0) and subsequent revisions were issued as follows: Revision 1, 7/11/2008, Revision 2, 6/24/2009, and Revision 3, 3/31/2010.

The following tables summarize the permitting changes to the Facility Permit subsequent to the initial Title V permit issued to Exide on August 1, 2002:

Revision 1, 7/11/2008

SECTION H (Permit to Construct)

<b>Appl. No.</b>	<b>Description</b>	<b>Device</b>	<b>Process</b>	<b>System</b>
483403	Replacement of cartridge filters in the South Torit dust collector with HEPA cartridge filters.	C39	1	6

Revision 2, 6/24/2009

SECTION H (Permit to Construct)

<b>Appl. No.</b>	<b>Description</b>	<b>Device</b>	<b>Process</b>	<b>System</b>
496416	Add venting of 14 pot furnace burner exhausts and one building overhead hood to the reverb feed room dust collectors	C156, C157, S158	1	10
496418 (central vacuum A)	Delete venting of one building overhead hood from the common exhaust system of the cupola feed room baghouse serving 2 plant central vacuum systems, and transfer this ventilation point to the dust collectors of A/N 496416	C48, C159, C160, D161, S142	1	11
496419 (central vacuum B)		C162, C163, D164,		
496420, 496421, 496423, 496424, 496425, 496426, 496428, 496429, 496432, 496433, 496434, 496435, 496437, 496438	Vent the burner compartments of 14 pot furnaces to the dust collectors of A/N 496416. This alteration is intended to prevent the accidental discharge of uncontrolled lead emissions in the event of a pot furnace vessel malfunction.	D11, D13, D15, D17, D19, D24, D26, D28, D30, D32, D34, D36, D7, D9	1	5

In addition, Section D of the permit was revised pursuant to an AQMD Hearing Board decision issued under Case No. 3151-18, on November 25, 2008. The changes consist of:

- Replacement of cupola furnace (Device D128, Process 1, System 3) permit condition C1.2 with version existing prior to May 13, 2008.
- Replacement of reverberatory furnace (Device 119, Process 1, System 3) permit condition C1.3 with version existing prior to May 13, 2008.

Revision 3, 3/31/2010

SECTION H (Permit to Construct)

<b>Appl. No.</b>	<b>Description</b>	<b>Device</b>	<b>Process</b>	<b>System</b>
500783	Raw Material Preparation System (RMPS) Total Enclosure Building	C175	1	1
500784	Add venting of RMPS Total Enclosure Building (C175) and South Corridor Total Enclosure Building (C182) to the dust collectors of devices C156 and C157	C156 C157	1	10
500786	Install spark arrestor system in duct connected to rotary dryer baghouse (C144)	B176	1	2

Appl. No.	Description	Device	Process	System
501056	Require new permits for existing Smelting and Refining Total Enclosure Building and the attached South Corridor Building (Total Enclosure Buildings) for the purpose of adding special monitoring, record keeping, and reporting requirements associated with building negative pressure gauges.	C179 C182	1	6
501057	Replace scrubber (C165) 40-H.P. blower with a 100-H.P. blower.  Add equipment description to HEPA filter mist eliminator (C172) and require new Rule 1420 source tests	C165  C172	1	1
501059	New rotary dryer Total Enclosure Building	C177	1	2
501060	Add ventilation of rotary dryer Total Enclosure Building (C177) by refining pot baghouse of device C46	C46	1	8
501061	Install new truck washing station and partial enclosure building (tunnel)	D178 C180	3	11
501062	Permit for new HEPA vacuum floor sweeper	C181	3	12

#### 4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Sections D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. NSPS requirements of 40 CFR Part 60 apply to certain units at the facility and the permit terms and conditions may be found in Sections D and H of the Title V permit. NESHAP requirements of 40 CFR Part 63 also apply to certain units at the facility and the permit terms and conditions may be found in Sections D, H and J of the Title V permit.

#### 5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Sections D, F, H and J, and Appendix B of the proposed Title V permit).

This facility is required to monitor fence line ambient air concentrations of lead using five (5) high volume air sampling stations. In addition, Exide operates a sixth monitor located in a nearby railroad yard. The AQMD also operates a lead monitoring station directly across the street on the East side of this facility in the Rehrig Pacific company parking lot, and an additional monitoring station in the railroad yard which is located near the North side of this facility.

Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluation. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 apply to certain units at the facility and the permit terms and conditions may be found in Section D, H, I, and J of the Title V permit, and in the Rule 1407 and Rule 1420 compliance plan letters issued to this facility. Discussion of the CAM requirements is included in the evaluation of the CAM Plan covered by A/N 466858.

## 6. Permit Features

### Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

### Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

## 7. Summary of Emissions and Health Risks

### Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2009

Pollutant ID	Pollutant Description	Annual Emissions
CO	Carbon Monoxide	27.568
NOX	Nitrogen Oxides	87.178
ROG	Reactive Organic Gases	0.840
SOX	Sulfur Oxides	37.174
TSP	Total Suspended Particulates	1.199

### Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2009

#### Toxic Pollutants (Pounds per Year):

Pollutant ID	Pollutant Description	Annual Emissions
3268879	1,2,3,4,5,6,7,8-Octachlorodibenzo-p-dioxin [POM]	< 0.001
39001020	1,2,3,4,5,6,7,8-Octachlorodibenzofuran [POM]	< 0.001
35822469	1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	< 0.001
67562394	1,2,3,4,6,7,8-Heptachlorodibenzofuran	< 0.001
55673897	1,2,3,4,7,8,9-Heptachlorodibenzofuran	< 0.001
39227286	1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	< 0.001
70648269	1,2,3,4,7,8-Hexachlorodibenzofuran	< 0.001
57653857	1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	< 0.001

<b>Pollutant ID</b>	<b>Pollutant Description</b>	<b>Annual Emissions</b>
57117449	1,2,3,6,7,8-Hexachlorodibenzofuran	< 0.001
19408743	1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	< 0.001
72918219	1,2,3,7,8,9-Hexachlorodibenzofuran	< 0.001
40321764	1,2,3,7,8-Pentachlorodibenzo-p-dioxin	< 0.001
57117416	1,2,3,7,8-Pentachlorodibenzofuran	< 0.001
106990	1,3-Butadiene	2.286
60851345	2,3,4,6,7,8-Hexachlorodibenzofuran	< 0.001
57117314	2,3,4,7,8-Pentachlorodibenzofuran	< 0.001
51207319	2,3,7,8-Tetrachlorodibenzofuran	< 0.001
75070	Acetaldehyde	0.051
7664417	Ammonia	4298.907
7440382	Arsenic	4.726
71432	Benzene	0.893
7440439	Cadmium	7.483
100414	Ethyl Benzene	0.113
50000	Formaldehyde	0.203
110543	Hexane	0.075
7439921	Lead (inorganic)	607.418
91203	Naphthalene	0.071
7440020	Nickel	3.739
1151	PAHs, total, with components not reported	0.023
108883	Toluene	0.437
1330207	Xylenes	0.324

#### Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The most recent finalized Facility Health Risk was approved in 1999 with the following risk factors:

Cancer Risk	2.3 in one million
Cancer Burden	0.01
Acute Hazard Index	0.53
Chronic Hazard Index	0.04

Based on this level of health risk, a Risk Reduction Plan is currently not required under AQMD Rule 1402, and no permit changes are necessary based solely on currently known health risk levels. A Quadrennial Air Toxics Inventory Report (ATIR) was submitted by Exide in in 2003. The AQMD requested another ATIR in 2006. An additional HRA was requested by the AQMD in 2007. This HRA is currently under review. Based on available information, it was subsequently determined that additional source tests and toxic air contaminant speciation/quantification was required. Source tests to fulfill this requirement were conducted in October, 2010, and the source test reports were pending at the time of preparation of this Statement of Basis in January, 2011.

## **8. Compliance History**

As noted, the facility has been in constant operation since Exide assumed its ownership in the year 2000. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had 0 citizen complaints filed, 9 Notices to Comply issued, and 9 Notices of Violation in the last two years.

This facility filed an appeal of an Executive Order, issued in May, 2008, which limited process throughput, designed to reduce excess ambient air lead concentrations at the fence line of this facility. The AQMD Hearing Board issued a decision under Case No. 3151-18, on November 25, 2008, repealing the conditions of the Executive Order. Changes were made to the Facility Permit under Revision 2, as previously indicated.

This facility has also been under an Order for Abatement (OA) covered by Case No. 3151-21. This OA was completed on January 15, 2011.

## **9. Compliance Certification**

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.