



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

December 5, 2014

Mr. John Hogarth
Plant Manager
Exide Technologies
2700 S. Indiana Street
Vernon, CA 90058

Subject: Title V Permit Revision (A/N562500 & A/N 560680) for Exide Technologies; Revised Final Risk Reduction Plan (Facility ID 124838)

Dear Mr. Hogarth:

This is in reference to the applications and Risk Reduction Plan filed by Exide for Permits to Construct new air pollution control equipment and to modify existing air pollution control systems to implement the Risk Reduction Plan to reduce toxic emissions and public exposure.

The SCAQMD also prepared a Mitigated Negative Declaration to evaluate the environmental impacts from the construction and operation of the above proposed modifications to the facility. The final Risk Reduction Plan was revised by Exide to incorporate additional changes and improvements to the air pollution control equipment recommended by the SCAQMD. The SCAQMD released the draft Title V Permit Revision and Draft Mitigated Negative Declaration for public review and comments and sent the draft Title V Permit Revisions to US EPA for their review and comment and held a public meeting on November 25, 2014 regarding the proposed modifications which also implement the risk reduction measures described in the Risk Reduction Plan. SCAQMD received no comments from the public or US EPA during the comment period.

Please be advised that SCAQMD has approved the Mitigated Negative Declaration, the final Title V Permit Revision for the applications referenced below, and the Revised Final Risk Reduction Plan submitted on August 8, 2014. The SCAQMD is also incorporating the previously approved Rule 1420.1 Continuous Furnace Pressure Monitoring Plan into the permit.

Section H: PERMITS TO CONSTRUCT

Application No.	Description
562498	Modify APCS No. 2 by installing new venturi/tray scrubber, connecting a re-purposed existing baghouse, and installing a new cartridge dust collector and Regenerative Thermal Oxidizer (RTO).
562501	Modify blast/cupola furnace by venting its process emissions to re-purposed baghouse/new scrubber of APCS No. 2 as described above in A/N 562498.
564348	Modify thimble hoods of blast/cupola furnace by enclosing and venting to modified APCS No. 2 described above in A/N 562498.
562502 562515	Modify pot/refining kettles Nos. 1 & 2 (arsenic additions) to vent process emissions to re-purposed baghouse/new scrubber of APCS No. 2 as described above in A/N 562498.

Application No.	Description
559499	Modify APC system serving rotary dryer (reverb furnace feed drying system) by installing a new RTO.
562503	Modify APCS No. 1 serving reverberatory furnace by disconnecting unused baghouse and re-purposing the baghouse for use in APCS No. 2 described above in A/N 562498.
564346	Modify reverberatory furnace to vent its process emissions to modified APCS No. 1 as described above in A/N 562503.
558214	Modify baghouses (MAC East & West) serving the reverb furnace feed room by the addition of HEPA filters.
562504	Prohibit arsenic additions in pot/refining kettles Nos. 3, 4, 5, 6, 7, 8, 9, A, B, E, F, G.
562499	
562505	
562506	
562507	
562508	
562509	
562510	
562511	
562512	
562513	
562514	

Section I: PLANS AND SCHEDULES

Application No.	Plan/Description
560680	Rule 1420.1 Continuous Furnace Pressure Monitoring (CFPM) Plan

Please review the attached sections carefully. Insert the enclosed sections into your RECLAIM/Title V Facility Permit and discard the earlier versions. The operation of your facility is bound by the conditions and/or requirements stated in the facility Permit to Operate. If you believe that there are administrative errors, or if you have any questions concerning changes to your permit, please contact Mr. Thomas Liebel, Senior Engineer, at (909) 396-2554 within 30 days of the receipt of your permit.

Sincerely,



Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering and Compliance

AYL:CDT:TGL

Enclosures

cc: Gerardo Rios, EPA Region IX
Compliance
Central File
Applications 562500; 560690



FACILITY PERMIT TO OPERATE

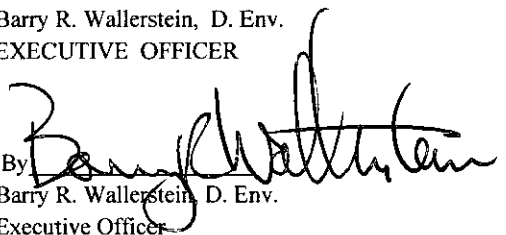
**EXIDE TECHNOLOGIES
2700 S INDIANA ST
VERNON, CA 90058**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By 
Barry R. Wallerstein, D. Env.
Executive Officer

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

TABLE OF CONTENTS

Section	Description	Revision #	Date Issued
A	Facility Information	4	03/28/2013
B	RECLAIM Annual Emission Allocation	18	01/01/2014
C	Facility Plot Plan	TO BE DEVELOPED	
D	Facility Description and Equipment Specific Conditions	5	09/28/2012
E	Administrative Conditions	1	03/25/2011
F	RECLAIM Monitoring and Source Testing Requirements	1	03/25/2011
G	Recordkeeping and Reporting Requirements for RECLAIM Sources	1	03/25/2011
H	Permit To Construct and Temporary Permit to Operate	15	12/05/2014
I	Compliance Plans & Schedules	4	12/05/2014
J	Air Toxics	1	03/25/2011
K	Title V Administration	1	03/25/2011
Appendix			
A	NOx and SOx Emitting Equipment Exempt From Written Permit Pursuant to Rule 219	1	03/25/2011
B	Rule Emission Limits	1	03/25/2011

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

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)					
SCRUBBER, PACKED BED, MAPCO, MODEL MW-100-24, WITH 2 FT PACKING, 4 IN THICK MESH PAD, CHEVRON TYPE MIST ELIMINATOR, 100 HP BLOWER, WIDTH: 11 FT ; HEIGHT: 8 FT 8 IN; LENGTH: 20 FT 2 IN A/N: 546551 Permit to Construct Issued: 07/19/13	C165	D1 D2 D3 D4 D5 C172 C175		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	C8.4, D12.12, D182.8, D323.1, E448.10, H116.3, K171.8
MIST ELIMINATOR, HEPA, WITH 16 PREFILTERS, EACH 2 FT. W. X 2 FT. L. X 2 INCHES THICK, MAPCO, MODEL MW-100-24, WITH 16 HEPA FILTERS, EACH 2 FT. W. X 2 FT. L. X 11.5 INCHES THICK A/N: 546551 Permit to Construct Issued: 07/19/13	C172	C165 S166		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D12.14, D182.8, D323.1, E448.1, E448.10, H116.3, K171.8
STACK, HEIGHT: 65 FT ; DIAMETER: 3 FT 8 IN A/N: 546551 Permit to Construct Issued: 07/19/13	S166	C172		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D182.8, D182.11, D381.2, E448.11, K171.8

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
ENCLOSURE, BUILDING, RAW MATERIAL PREPARATION SYSTEM, 125 FT W. X 329 FT L. X 75 FT H., APPROXIMATE DIMENSIONS WITH A/N: 533202 Permit to Construct Issued: 07/20/12	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	C165 C175		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	E448.2
System 2: FEED DRYING SYSTEM					
DRYER, ROTARY, NATURAL GAS, FEED DRYING, 8 MMBTU/HR A/N: 564346 Permit to Construct Issued: 12/05/14	D115	C143	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.005 LBS/TON MATERIAL (1) [RULE 2011, 12-7-1995; RULE 2011, 4-9-1999]	B295.1, C6.1, D12.8, D323.1, H116.2, K67.10
CONVEYOR, SCREW, DRYER DISCHARGE A/N: 564346 Permit to Construct Issued: 12/05/14	D116	C143		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
CYCLONE, HEIGHT: 17 FT 7 IN; DIAMETER: 5 FT 10 IN A/N: 559499 Permit to Construct Issued: 12/05/14	C143	D114 D115 D116 C144		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
BAGHOUSE, WITH EXPANDED TEFLON MEMBRANE BAGS WITH TEFLON SUBSTRATES, 5881 SQ.FT.; 312 BAGS A/N: 559499 Permit to Construct Issued: 12/05/14	C144	C143 C184		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	C6.2, D12.5, D12.6, D381.1, E102.1, E193.1, H116.1, H116.2, H116.4, K67.2
INJECTOR, SIDEWALL WATER SPRAY, WITH 2 FLAMEX F180 NOZZLES, WITH SPARK ARRESTOR CONTROLLER, FLAMEX FMZ4100GAB24, A BATTERY BACK-UP, 8 FUX 3001-E OPTICAL IR SPARK DETECTORS A/N: 559499 Permit to Construct Issued: 12/05/14	B176				E448.6
DUST COLLECTOR, HEPA, WITH 6 PRE-FILTERS EACH 2 FT W. X 2 FT L. X 2 INCHES THICK, WITH 6 HEPA FILTERS EACH 2 FT W. X 2 FT L. X 11.5 INCHES THICK A/N: 559499 Permit to Construct Issued: 12/05/14	C184	C144 C199		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D12.18, D323.1, H116.3

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
OXIDIZER, THERMAL REGENERATIVE, OXIDIZERS INC. MODEL OX-2CH-PP02, 8FT W. X 14FT L. X 14FT-6IN.H., NATURAL GAS, WITH A MAXON 3 IN. BURNER, A 10-HP COMBUST. BLOWER AND A 100-HP EXHAUST BLOWER, 2.5 MMBTU/HR A/N: 559499 Permit to Construct Issued: 12/05/14	C199	S145 C184	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV AT 15 MINS. (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 30 PPMV (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	C8.9, D182.11, D182.12, D182.13, D323.1, K67.12, K171.6
STACK, HEIGHT: 120 FT ; DIAMETER: 3 FT A/N: 559499 Permit to Construct Issued: 12/05/14	S145	C199			D182.5, D182.11, D182.12, D182.13, D381.1, E448.11, K171.6
System 3: LEAD SMELTING SYSTEM					
CONVEYOR, SCREW, FEED A/N: 564346 Permit to Construct Issued: 12/05/14	D197	C38 C39 C47		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1
CONVEYOR, SCREW, FEED A/N: 564346 Permit to Construct Issued: 12/05/14	D198	C38 C39 C47		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, REVERBATORY, NATURAL GAS, LEAD ACID BATTERY SCRAP, 30 MMBTU/HR A/N: 564346 Permit to Construct Issued: 12/05/14	D119	C38 C39 D135	NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.022 GRAINS/SCF (8A) [40CFR 60 Subpart L, 12-3-1976]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 1.8 PPMV (3) [RULE 2011, 12-7-1995; RULE 2011, 4-9-1999]	A63.2, B59.1, B163.1, C1.3, C1.4, C303.1, D12.2, D12.3, D12.4, D12.8, D12.20, D323.1, E448.13, H116.2, K67.11
TAPPING PORT, LEAD A/N: 564346 Permit to Construct Issued: 12/05/14	D120	C38 C39 C47		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
LAUNDER, LEAD, REVERB TAP A/N: 564346 Permit to Construct Issued: 12/05/14	D121	C38 C39 C47		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
LAUNDER, LEAD, REVERB TAP A/N: 564346 Permit to Construct Issued: 12/05/14	D122	C38 C39 C47		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
LAUNDER, LEAD, REVERB TAP A/N: 564346 Permit to Construct Issued: 12/05/14	D123	C38 C39 C47		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
TAPPING PORT, LEAD SLAG A/N: 564346 Permit to Construct Issued: 12/05/14	D124	C38 C39 C47		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
FUGITIVE EMISSIONS, MISCELLANEOUS, SLAG HANDLING SYSTEM A/N: 564346 Permit to Construct Issued: 12/05/14	D125	C38 C39 C47		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
System 4: LEAD SLAG PROCESSING SYSTEM					

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
HOPPER, WEIGH, CUPOLA FURNACE FEED A/N: 562501 Permit to Construct Issued: 12/05/14	D126	C48		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
HOPPER, CUPOLA FURNACE FEED, EMERGENCY A/N: 562501 Permit to Construct Issued: 12/05/14	D127			LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
FURNACE, CUPOLA, COKE, NATURAL GAS, LEAD SLAG AND LEAD ACID BATTERY SCRAP, WITH A 1 MMBTU/HR PORTABLE PRE-HEATING NATURAL GAS BURNER A/N: 562501 Permit to Construct Issued: 12/05/14	D128	C38 C39 C44	NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.022 GRAINS/SCF (8A) [40CFR 60 Subpart L, 12-3-1976]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 1.8 PPMV (3) [RULE 2011, 12-7-1995; RULE 2011, 4-9-1999]	A63.2, B59.2, B163.2, C1.2, D12.20, D182.14, D323.1, E448.12, E448.13, H116.2, K67.5, K171.6
TAPPING PORT, LEAD A/N: 562501 Permit to Construct Issued: 12/05/14	D129	C38 C39 C46		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
LAUNDER, LEAD, CUPOLA TAP A/N: 562501 Permit to Construct Issued: 12/05/14	D130	C38 C39 C46		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
LAUNDER, LEAD, CUPOLA TAP A/N: 562501 Permit to Construct Issued: 12/05/14	D131	C38 C39 C46		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D323.1
TAPPING PORT, LEAD SLAG A/N: 562501 Permit to Construct Issued: 12/05/14	D132	C38 C39 C41 C45 C174		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D182.14, D323.1, E448.12, E448.14

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FUGITIVE EMISSIONS, MISCELLANEOUS, CUPOLA FURNACE THIMBLE, WITH AN AUTOMATIC FEED CHUTE COVER DOOR A/N: 562501 Permit to Construct Issued: 12/05/14	D133	C38 C39 C204		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 405, 2-7-1986]	D182.14, D323.1, E448.9, E448.12
System 5: LEAD METAL REFINING SYSTEM					
FURNACE, POT, NO. 1, NATURAL GAS, HARD LEAD, 2.5 MMBTU/HR A/N: 562515 Permit to Construct Issued: 12/05/14	D7	C38 C39 C41 C45 C174 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 5-6-2005]; NOX: 0.077 LBS/LB MATERIAL (1A) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 5-6-2005]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	A63.2, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, E448.12, E448.14, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, NO. 2, NATURAL GAS, HARD LEAD, 2.5 MMBTU/HR A/N: 562502 Permit to Construct Issued: 12/05/14	D9	C38 C39 C41 C45 C174 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 5-6-2005]; NOX: 0.077 LBS/LB MATERIAL (1A) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 5-6-2005]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	A63.2, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, E448.12, E448.14, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, NO. 3, NATURAL GAS, HARD LEAD, 2.5 MMBTU/HR A/N: 562504 Permit to Construct Issued: 12/05/14	D11	C38 C39 C46 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 5-6-2005]; NOX: 0.077 LBS/LB MATERIAL (1A) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 5-6-2005]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, NO. 4, NATURAL GAS, HARD LEAD, 2.5 MMBTU/HR A/N: 562499 Permit to Construct Issued: 12/05/14	D13	C38 C39 C46 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 5-6-2005]; NOX: 0.077 LBS/LB MATERIAL (1A) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 5-6-2005]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, NO. 5, NATURAL GAS, SPECIALTY LEAD, 2.5 MMBTU/HR A/N: 562505 Permit to Construct Issued: 12/05/14	D15	C38 C39 C46 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 5-6-2005]; NOX: 0.077 LBS/LB MATERIAL (1A) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 5-6-2005]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, A, NATURAL GAS, HARD LEAD, 2.5 MMBTU/HR A/N: 562510 Permit to Construct Issued: 12/05/14	D17	C38 C39 C46 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 5-6-2005]; NOX: 0.077 LBS/LB MATERIAL (1A) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 5-6-2005]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, B, NATURAL GAS, HARD LEAD, 2.5 MMBTU/HR A/N: 562511 Permit to Construct Issued: 12/05/14	D19	C38 C39 C46 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 5-6-2005]; NOX: 0.077 LBS/LB MATERIAL (1A) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 5-6-2005]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, NO. 6, NATURAL GAS, SOFT LEAD, 2.5 MMBTU/HR A/N: 562506 Permit to Construct Issued: 12/05/14	D24	C38 C39 C47 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 12-7-1995; RULE 2011, 4-9-1999]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 12-7-1995; RULE 2011, 4-9-1999]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, NO. 7, NATURAL GAS, SOFT LEAD, 2.5 MMBTU/HR A/N: 562507 Permit to Construct Issued: 12/05/14	D26	C38 C39 C47 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 12-7-1995; RULE 2011, 4-9-1999]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 12-7-1995; RULE 2011, 4-9-1999]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, NO. 8, NATURAL GAS, SOFT LEAD, 2.5 MMBTU/HR A/N: 562508 Permit to Construct Issued: 12/05/14	D28	C38 C39 C47 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 12-7-1995; RULE 2011, 4-9-1999]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 12-7-1995; RULE 2011, 4-9-1999]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, NO. 9, NATURAL GAS, SOFT LEAD, 2.5 MMBTU/HR A/N: 562509 Permit to Construct Issued: 12/05/14	D30	C38 C39 C47 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 12-7-1995; RULE 2011, 4-9-1999]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 12-7-1995; RULE 2011, 4-9-1999]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, G, NATURAL GAS, SOFT LEAD, 2.5 MMBTU/HR A/N: 562514 Permit to Construct Issued: 12/05/14	D32	C38 C39 C47 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 5-6-2005]; NOX: 0.077 LBS/LB MATERIAL (1A) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 5-6-2005]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, E, NATURAL GAS, SOFT LEAD, 2.5 MMBTU/HR A/N: 562512 Permit to Construct Issued: 12/05/14	D34	C38 C39 C47 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 5-6-2005]; NOX: 0.077 LBS/LB MATERIAL (1A) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 5-6-2005]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
FURNACE, POT, F, NATURAL GAS, SOFT LEAD, 2.5 MMBTU/HR A/N: 562513 Permit to Construct Issued: 12/05/14	D36	C38 C39 C47 B206	NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 0.017 LBS/LB MATERIAL (1) [RULE 2012, 5-6-2005]; NOX: 0.077 LBS/LB MATERIAL (1A) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.133 LBS/LB MATERIAL (1) [RULE 2011, 5-6-2005]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	A63.2, B59.3, B295.2, B295.3, D12.8, D323.1, E71.1, E448.7, H116.2
MANIFOLD, POT FURNACE BURNER EXHAUST, BASEMENT BURNER ROOM, WITH A 15-H.P. EXHAUST BLOWER A/N: 562513 Permit to Construct Issued: 12/05/14	B206	D7 D9 D11 D13 D15 D17 D19 D24 D26 D28 D30 D32 D34 D36 C156 C157			
System 7: REVERBERATORY AND CUPOLA FURNACE APCS					

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
TOWER, QUENCH CHAMBER, WATER SPRAY TYPE, HEIGHT: 61 FT ; DIAMETER: 10 FT WITH A/N: 562503 Permit to Construct Issued: 12/05/14	D135	D119 D136		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1
FUGITIVE EMISSIONS, MISCELLANEOUS, QUENCH CHAMBER CLEANOUT DOOR	D149	C47		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1
HEAT EXCHANGER, REVERB FURNACE EXHAUST GAS, A-PIPE TYPE, 49 IN. OUTSIDE DIA., 130 FT. TOTAL LENGTH A/N: 562503 Permit to Construct Issued: 12/05/14	D136	D135 D137		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1
HEAT EXCHANGER, ,BALLOON TYPE FLUE COOLER, SECTION 1, REVERB FURNACE EXHAUST GAS, 66 IN. W., 48 FT. L., 9 FT. H. A/N: 562503 Permit to Construct Issued: 12/05/14	D137	D136 D138		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1
HEAT EXCHANGER, ,BALLOON-TYPE FLUE COOLER, SECTION 2, REVERB FURNACE EXHAUST GAS, 48 IN. W., 66 FT. L., 6 FT. H. A/N: 562503 Permit to Construct Issued: 12/05/14	D138	C40 D137		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1

- * (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
AFTERBURNER, NATURAL GAS, WITH 20 HP COMBUSTION AIR BLOWER, 10 MMBTU/HR A/N: 562498 Permit to Construct Issued: 12/05/14	C44	D128 D134	NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	C8.1, D323.1, H116.2, K67.8
DUST COLLECTOR, RTO GAS INLET, WITH 64 CARTRIDGE FILTERS, EACH 2 FT.-4.4 IN. DIA. X 2 FT.-6IN. L., MAC, MODEL MAC2FLO 4M2F64, WITH A TRIBOELECTRIC-TYPE BROKEN FILTER DETECTOR, PULSE JET CLEANED A/N: 562498 Permit to Construct Issued: 12/05/14	C204	D133 C205		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D12.1, D12.17, D323.1, D381.1, E102.1, E193.1, H116.2, H116.4, K67.13
OXIDIZER, THERMAL REGENERATIVE, OXIDIZERS INC. MODEL OX-2CH-PP02U, 11 FT W. X 19 FT.-6IN. L. X 23 FT-11 IN.H., NATURAL GAS, WITH A MAXON 4 IN. BURNER, A 10-HP COMBUST. BLOWER AND A 200-HP EXHAUST BLOWER, 4.6 MMBTU/HR A/N: 562498 Permit to Construct Issued: 12/05/14	C205	C41 C45 C174 C204	NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	CO: 2000 PPMV AT 15 MINS. (5) [RULE 407, 4-2-1982]; LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; NOX: 30 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]; SOX: 0.83 LBS/MMSCF NATURAL GAS (1) [RULE 2011, 5-6-2005]	C8.9, D182.12, D182.13, D323.1, E448.14, K67.12
TANK, CUPOLA JACKET COOLING, THERMOSIPHON A/N: 562498 Permit to Construct Issued: 12/05/14	D134	C44 D183			

- | | |
|---|---|
| <p>* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits</p> | <p>(2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements</p> |
|---|---|
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
HEAT EXCHANGER, CUPOLA FURNACE EXHAUST GAS, A-PIPE TYPE, 49 IN. OUTSIDE DIA., 130 FT. TOTAL LENGTH A/N: 562498 Permit to Construct Issued: 12/05/14	D183	D134 D173		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1
HEAT EXCHANGER, U-TUBE COOLER, FIVE SECTION, WITH 2 HOPPERS, A TUBE BYPASS, A TUBE DAMPER VALVE, AND A HOPPER BY-PASS WITH A DAMPER A/N: 562498 Permit to Construct Issued: 12/05/14	D173	C174 D183		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1
CYCLONE, DIAMETER: 4 FT 9 IN A/N: 562498 Permit to Construct Issued: 12/05/14	C174	D7 D9 C41 C45 D173		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	
BAGHOUSE, WITH EXPANDED TEFLON MEMBRANE BAGS WITH TEFLON SUBSTRATES, WITH A 450-H.P. EXHAUST BLOWER, 21362 SQ.FT.; 510 BAGS A/N: 562503 Permit to Construct Issued: 12/05/14	C40	C42 D138 C202		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	C6.3, D12.5, D12.6, D12.11, D182.14, D182.15, D381.1, E102.1, E193.1, E448.14, H116.1, H116.2, H116.4, K67.2

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
BAGHOUSE, WITH EXPANDED TEFLON MEMBRANE BAGS WITH TEFLON SUBSTRATES, WITH A 450-H.P. EXHAUST BLOWER, 21362 SQ.FT.; 510 BAGS A/N: 562498 Permit to Construct Issued: 12/05/14	C41	D7 D9 C42 D132 C174 C202		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	C6.3, D12.5, D12.6, D12.11, D182.14, D182.15, D381.1, E102.1, E193.1, E448.14, H116.1, H116.2, H116.4, K67.2
BAGHOUSE, WITH EXPANDED TEFLON MEMBRANE BAGS WITH TEFLON SUBSTRATES, WITH A 450-H.P. EXHAUST BLOWER, 22620 SQ.FT. A/N: 562498 Permit to Construct Issued: 12/05/14	C45	D7 D9 C42 D173 C174 C202		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	C6.3, D12.5, D12.6, D12.11, D182.14, D182.15, D381.1, E102.1, E193.1, E448.14, H116.1, H116.2, H116.4, K67.2
SCRUBBER, VENTURI, AIRPOL, MODEL 3970P, HEIGHT: 13 FT 9 IN; DIAMETER: 4 FT A/N: 562503 Permit to Construct Issued: 12/05/14	C42	C40 C41 C43 C45		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]; ROG: (10) [40CFR 63 Subpart X, #01, 1-29-1999]	C8.2, C8.3, C8.5, C8.6, C8.7, D182.14, D182.15, D323.1, E448.14, H116.2, K67.7

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
SCRUBBER, TRAY, NEPTUNE AIRPOL, MODEL T-271, WITH 4 TRAYS, HEIGHT: 30 FT 9 IN; DIAMETER: 8 FT 6 IN A/N: 562503 Permit to Construct Issued: 12/05/14	C43	C42 S139		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]; ROG: (10) [40CFR 63 Subpart X, #01, 1-29-1999]	C8.2, C8.3, C8.5, C8.6, C8.7, D182.14, D182.15, D323.1, H116.2, K67.7
SCRUBBER, VENTURI, AIRPOL, MODEL BASIC C-B VENTURI, HEIGHT: 17 FT ; DIAMETER: 4 FT 9 IN A/N: 562498 Permit to Construct Issued: 12/05/14	C202	C40 C41 C45 C203		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]; ROG: (10) [40CFR 63 Subpart X, #01, 1-29-1999]	C8.10, C8.12, C8.13, D182.15, D323.1, H116.2, K67.7
SCRUBBER, TRAY, AIRPOL, MODEL BASIC C-B VENTURI, HEIGHT: 35 FT 6 IN; DIAMETER: 11 FT A/N: 562498 Permit to Construct Issued: 12/05/14	C203	S139 C202		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]; ROG: (10) [40CFR 63 Subpart X, #01, 1-29-1999]	C8.11, C8.12, C8.13, D182.15, D323.1, H116.2, K67.7
STACK, WITH AN EXHAUST OUTLET DIAMETER: 5 FT. 5 IN., COMMON TO REVERB AND CUPOLA, HEIGHT: 112 FT ; DIAMETER: 7 FT 6 IN A/N: 562503 Permit to Construct Issued: 12/05/14	S139	C43 C203		LEAD: 0.01 LBS/HR (6) [RULE 1420.1, 3-7-2014]	A63.1, D82.1, D182.11, D182.14, D323.1, E448.11, K67.9, K171.6
System 8: CUPOLA AND HARD LEAD REFINERY FURNACES APCS					

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
BAGHOUSE, WITH A 450 HP BLOWER, 64000 SQ.FT. A/N: 564348 Permit to Construct Issued: 12/05/14	C46	D8 D10 D11 D12 D13 D14 D15 D16 D17 D18 D19 D20 D129 D130 D131 D133 C177 C196		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D12.6, D12.7, D12.10, D12.11, D182.10, D381.1, E102.1, E193.1, H116.1, H116.2, H116.4, K67.3, K171.7
DUST COLLECTOR, HEPA, 8 SECTIONS, WITH 72 PRE-FILTERS TOTAL, EACH 2 FT. W. X 2 FT. L. X 2 INCHES THICK, WITH, 72 HEPA FILTERS TOTAL, EACH 2 FT. W. X 2 FT. L. X 1 FT. THICK A/N: 564348 Permit to Construct Issued: 12/05/14	C196	C46 S140		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D12.19, D182.10, D323.1, E102.1, E448.1, H116.1, H116.2, K171.7
STACK, HEIGHT: 112 FT ; DIAMETER: 6 FT 11 IN A/N: 564348 Permit to Construct Issued: 12/05/14	S140	C196			D182.10, D182.11, D381.1, E448.11, K171.7
System 9: REVERBERATORY AND SOFT LEAD REFINERY FURNACES APCS					

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
BAGHOUSE, WITH 450 HP BLOWER, 64000 SQ.FT. A/N: 558212 Permit to Construct Issued: 03/14/14	C47	D24 D25 D26 D27 D28 D29 D30 D31 D32 D33 D34 D35 D36 D37 D117 D118 D120 D121 D122 D123 D124 D125 D149 C195 D197 D198		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D12.6, D12.10, D12.11, D182.9, D381.1, E102.1, E193.1, H116.1, H116.2, H116.4, K67.3, K171.9
DUST COLLECTOR, HEPA, 8 SECTIONS, WITH 72 PRE-FILTERS TOTAL, EACH 2 FT. W. X 2 FT. L. X 2 INCHES THICK, WITH, 72 HEPA FILTERS TOTAL, EACH 2 FT. W. X 2 FT. L. X 1 FT. THICK A/N: 558212 Permit to Construct Issued: 03/14/14	C195	C47 S141		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D12.19, D182.9, D323.1, E102.1, E448.1, H116.1, H116.2, K171.9
STACK, HEIGHT: 112 FT ; DIAMETER: 6 FT 11 IN A/N: 558212 Permit to Construct Issued: 03/14/14	S141	C195			D182.9, D182.11, D381.1, E448.11, K171.9
System 10: REVERB FURNACE FEED ROOM APCS					
BAGHOUSE, NO. 1, WITH 494 BAGS, EACH 5 INCHES DIAMETER X 12 FEET LONG, PTFE MEMBRANE, MAC, MODEL 144MCF494, WITH A 150 HP BLOWER AND A BROKEN BAG DETECTOR, PULSE JET CLEANED A/N: 558214 Permit to Construct Issued: 12/05/14	C156	D109 D110 D111 D112 D113 D151 S158 C175 C182 C190 C200 B206		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	C6.4, D12.6, D12.7, D12.10, D12.16, D381.1, E102.1, H116.1, H116.4

- * (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
DUST COLLECTOR, HEPA, WITH 25 PRE-FILTERS TOTAL, EACH 2 FT. W. X 2 FT. L. X 2 INCHES THICK, WITH, 25 HEPA FILTERS, EACH 2 FT. W. X 2 FT. L. X 1 FT. THICK A/N: 558214 Permit to Construct Issued: 12/05/14	C200	C156 S158		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D12.19, D182.10, D323.1, E102.1, E448.1, H116.1, H116.2, K171.7
BAGHOUSE, NO. 2, WITH 494 BAGS, EACH 5 INCHES DIAMETER X 12 FEET LONG, PTFE MEMBRANE, MAC, MODEL 144MCF494, WITH A 150 HP BLOWER AND A BROKEN BAG DETECTOR, PULSE JET CLEANED A/N: 558214 Permit to Construct Issued: 12/05/14	C157	D109 D110 D111 D112 D113 D151 S158 C175 C182 C190 C201 B206		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	C6.4, D12.6, D12.7, D12.10, D12.16, D381.1, E102.1, H116.1, H116.4
DUST COLLECTOR, HEPA, WITH 25 PRE-FILTERS TOTAL, EACH 2 FT. W. X 2 FT. L. X 2 INCHES THICK, WITH, 25 HEPA FILTERS, EACH 2 FT. W. X 2 FT. L. X 1 FT. THICK A/N: 558214 Permit to Construct Issued: 12/05/14	C201	C157 S158		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D12.19, D182.10, D323.1, E102.1, E448.1, H116.1, H116.2, K171.7
STACK, HEIGHT: 120 FT ; DIAMETER: 6 FT A/N: 558214 Permit to Construct Issued: 12/05/14	S158	C200 C201		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D182.5, D182.10, D182.11, D381.1, E448.11, K171.7
System 11: CUPOLA FURNACE FEED ROOM APCS					

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
CYCLONE, SPENCER, MODEL CH950CB-MOD, HEIGHT: 7 FT ; DIAMETER: 4 FT 2 IN A/N: 546549 Permit to Construct Issued: 07/19/13	C159	C160 D161		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1, E102.1, H116.3
BAGHOUSE, CENTRAL VACUUM SYSTEM A, SPENCER, MODEL JH9600B8-M, WITH 75 HP BLOWER, 468 SQ.FT. A/N: 546549 Permit to Construct Issued: 07/19/13	C160	C48 C159		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D381.2, E102.1, H116.3
FLOOR SWEEP, 50 TOTAL A/N: 546549 Permit to Construct Issued: 07/19/13	D161	C159		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1
CYCLONE, SPENCER, MODEL CH942CB-MOD, HEIGHT: 6 FT ; DIAMETER: 3 FT 6 IN A/N:	C162	C163 D164		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1, E102.1, H116.3
BAGHOUSE, CENTRAL VACUUM SYSTEM B, SPENCER, MODEL JH9600B8-M, WITH 50 HP BLOWER, 468 SQ.FT. A/N:	C163	C48 C162		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D381.2, E102.1, H116.3
FLOOR SWEEP, 48 TOTAL A/N:	D164	C162		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D323.1
BAGHOUSE, WITH 300 HP BLOWER, 64000 SQ.FT. A/N: 546549 Permit to Construct Issued: 07/19/13	C48	D126 S142 C160 C163 C192		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D12.6, D12.10, D182.7, D381.1, E102.1, H116.1, H116.2, K171.7

- * (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, LEAD SMELTING PROCESS					
DUST COLLECTOR, HEPA, 8 SECTIONS, WITH 72 PRE-FILTERS TOTAL, EACH 2 FT. W. X 2 FT. L. X 2 INCHES THICK, WITH, 72 HEPA FILTERS TOTAL, EACH 2 FT. W. X 2 FT. L. X 1 FT. THICK A/N: 546549 Permit to Construct Issued: 07/19/13	C192	C48 S142		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D12.19, D182.7, D323.1, E102.1, E448.1, H116.1, H116.2, K171.7
STACK, HEIGHT: 112 FT ; DIAMETER: 7 FT A/N: 546549 Permit to Construct Issued: 07/19/13	S142	C48 C192		LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	D182.5, D182.7, D182.11, D381.1, E448.11, K171.5, K171.7
Process 3: WASTE HANDLING					
System 12: PORTABLE VACUUM SWEEPING SYSTEM					
FLOOR SWEEP, HEPA VACUUM, LEAD ABATEMENT, NILFISK, MODEL GWD220, CANISTER TYPE, 20 GALLON CAPACITY, 220 CFM RATED A/N: 558210 Permit to Construct Issued: 03/14/14	C193			LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	E448.4, K171.3
FLOOR SWEEP, HEPA VACUUM, LEAD ABATEMENT, NILFISK, MODEL GWD220, CANISTER TYPE, 20 GALLON CAPACITY, 220 CFM RATED A/N: 558211 Permit to Construct Issued: 03/14/14	C194			LEAD: (10) [40CFR 63 Subpart X, #01, 1-29-1999]; PM: (9) [RULE 404, 2-7-1986]	E448.4, K171.3

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: DEVICE ID INDEX

Device Index For Section H			
Device ID	Section H Page No.	Process	System
D7	7	1	5
D9	8	1	5
D11	9	1	5
D13	10	1	5
D15	11	1	5
D17	12	1	5
D19	13	1	5
D24	14	1	5
D26	15	1	5
D28	16	1	5
D30	17	1	5
D32	18	1	5
D34	19	1	5
D36	20	1	5
C40	23	1	7
C41	24	1	7
C42	24	1	7
C43	25	1	7
C44	22	1	7
C45	24	1	7
C46	26	1	8
C47	27	1	9
C48	29	1	11
D115	2	1	2
D116	2	1	2
D119	5	1	3
D120	5	1	3
D121	5	1	3
D122	5	1	3
D123	5	1	3
D124	5	1	3
D125	5	1	3
D126	6	1	4
D127	6	1	4

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: DEVICE ID INDEX

Device Index For Section H			
Device ID	Section H Page No.	Process	System
D128	6	1	4
D129	6	1	4
D130	6	1	4
D131	6	1	4
D132	6	1	4
D133	7	1	4
D134	22	1	7
D135	21	1	7
D136	21	1	7
D137	21	1	7
D138	21	1	7
S139	25	1	7
S140	26	1	8
S141	27	1	9
S142	30	1	11
C143	3	1	2
C144	3	1	2
S145	4	1	2
D149	21	1	7
C156	27	1	10
C157	28	1	10
S158	28	1	10
C159	29	1	11
C160	29	1	11
D161	29	1	11
C162	29	1	11
C163	29	1	11
D164	29	1	11
C165	1	1	1
S166	1	1	1
C172	1	1	1
D173	23	1	7
C174	23	1	7
C175	2	1	1

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: DEVICE ID INDEX

Device Index For Section H			
Device ID	Section H Page No.	Process	System
B176	3	1	2
D183	23	1	7
C184	3	1	2
C191	2	1	1
C192	30	1	11
C193	30	3	12
C194	30	3	12
C195	27	1	9
C196	26	1	8
D197	4	1	3
D198	4	1	3
C199	4	1	2
C200	28	1	10
C201	28	1	10
C202	25	1	7
C203	25	1	7
C204	22	1	7
C205	22	1	7
B206	20	1	5

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F52.1 This facility is subject to the applicable requirements of the following rules or regulation(s):

Rule 1420.1

A. The total facility mass lead emissions from all lead point sources shall not exceed 0.045 pounds of lead per hour.

B. The total facility and maximum emission rates shall be determined using the most recent source tests conducted by the facility or the District.

[RULE 1420.1, 3-7-2014]

F52.2 This facility is subject to the applicable requirements of the following rules or regulation(s):

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Rule 1420.1

The mass emissions from all arsenic, benzene, and 1,3-butadiene point sources at a large lead-acid battery recycling facility shall meet the following hourly emissions thresholds for the dates specified:

A) No later than 60 days after January 10, 2014, the total facility emission rate for a large lead-acid battery recycling facility from all point sources shall not exceed 0.00285 pound of arsenic per hour.

B) No later than January 1, 2015, the total facility emission rate for a large lead-acid battery recycling facility from all point sources shall not exceed 0.00114 pound of arsenic per hour.

C) No later than January 1, 2015, the total emission rate for a large lead-acid battery recycling facility from all point sources excluding point sources from emission control devices on total enclosures shall not exceed the following:

i) 0.0514 pound of benzene per hour; and

ii) 0.00342 pound of 1,3-butadiene per hour.

D) The point source mass emission rates shall be determined based on the average of triplicate samples, using the most recent District-approved source tests conducted by the facility or the District, pursuant to Rule 1420.1(k).

E) For purposes of this condition, only point sources that have a source test result of greater than 1 part per billion shall be included in determining the total facility mass emission rates for benzene and 1,3-butadiene.

[RULE 1420.1, 3-7-2014]

F67.1 The facility operator shall comply with all terms and conditions specified below.

Exide shall comply with all applicable mitigation measures stipulated in the Mitigation Monitoring and Reporting Plan which is part of the SCAQMD approved December 2014 Final Mitigated Negative Declaration for this facility.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[CA PRC CEQA, 11-23-1970]

F67.2 The facility operator shall comply with all terms and conditions specified below.

Exide shall comply with all terms and conditions of the Final Revised Rule 1402 Risk Reduction Plan, upon approval, the Order for Abatement of Hearing Board Case No. 3151-29, and all terms, conditions and mitigation measures identified in the Revised Dust Mitigation Plan which is approved under the Order for Abatement issued under Hearing Board Case No. 3151-32.

[RULE 1402, 3-4-2005; RULE 1420.1, 3-7-2014]

DEVICE CONDITIONS

A. Emission Limits

A63.1 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
CO	Less than or equal to 10800 LBS IN ANY 30-DAY PERIOD

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : S139]

A63.2 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
Visible emissions	Less than 10 Percent opacity

[40CFR 60 Subpart L, 12-3-1976]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D7, D9, D11, D13, D15, D17, D19, D24, D26, D28, D30, D32, D34, D36, D119, D128]

B. Material/Fuel Type Limits

B59.1 The operator shall not use the following material(s) in this device :

With the exception of the specific materials listed in condition no. 163-1, all other types of organic materials including, but not limited to, coal, charcoal, rubber, plastics, paper, rags, oil, grease, or metal contaminated with any of these materials.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1401, 12-7-1990; RULE 407, 4-2-1982**]

[Devices subject to this condition : D119]

B59.2 The operator shall not use the following material(s) in this device :

With the exception of the specific materials listed in condition no. 163-2, all other types of organic materials including, but not limited to, coal, charcoal, rubber, plastics, paper, rags, oil, grease, or metal contaminated with any of these materials.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1401, 12-7-1990; RULE 407, 4-2-1982**]

[Devices subject to this condition : D128]

B59.3 The operator shall not use the following material(s) in this device :

Arsenic metal and/or chemical additives containing arsenic compounds.

[**RULE 1401, 9-10-2010; RULE 1402, 3-4-2005; RULE 1407, 7-8-1994; RULE 1420.1, 3-7-2014**]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D11, D13, D15, D17, D19, D24, D26, D28, D30,
D32, D34, D36]

B163.1 The operator shall only use feed materials containing the following:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

ACID FILTERS

ACID DUMP/FILL SOLIDS

BAGHOUSE BAGS

BAGHOUSE DUST

CANS (SCRAP DRUMS)

CAST IRON

CHEESECLOTH FROM PASTING ROLLERS

CARBON COKE

COMBUSTION AIR

DROSS

EMISSION CONTROL SLUDGES, FILTER CAKE RESIDUES AND SOLIDS

ENRICHMENT OXYGEN

FILTER CAKE

GRID METAL, POSTS AND SEPARATORS

INDUSTRIAL BATTERY PLATE GROUPS AND TOPS

LEAD BASED PIGMENT

LEAD BEARING MATERIAL

LEAD OXIDE AND LEAD OXIDE RESIDUES

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

LIMEROCK

MILL SCALE

NATURAL GAS

PASTING BELTS

PURCHASED DROSS

PLASTIC AND RUBBER FROM SCRAP BATTERIES

SLURRY AND SLURRY SCREENINGS

SCRAP METAL

SHOP ABRASIVES

SILICA

SLAG

SUMP MUD

SWEEPINGS

WASTEWATER TREATMENT FILTER PRESS CLOTHS

WATER TREATMENT SLUDGES, FILTER CAKES, AND RESIDUES

[RULE 1401, 12-7-1990]

[Devices subject to this condition : D119]

B163.2 The operator shall only use feed materials containing the following:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

ACID FILTERS

ACID DUMP/FILL SOLIDS

BAGHOUSE BAGS

BAGHOUSE DUST

CANS (SCRAP DRUMS)

CAST IRON

CHEESECLOTH FROM PASTING ROLLERS

CARBON COKE

COMBUSTION AIR

DROSS

EMISSION CONTROL SLUDGES, FILTER CAKE RESIDUES AND SOLIDS

ENRICHMENT OXYGEN

FILTER CAKE

GRID METAL, POSTS AND SEPARATORS

INDUSTRIAL BATTERY PLATE GROUPS AND TOPS

LEAD BASED PIGMENT

LEAD BEARING MATERIAL

LEAD OXIDE AND LEAD OXIDE RESIDUES

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

LIMEROCK

MILL SCALE

NATURAL GAS

PASTING BELTS

PURCHASED DROSS

SLURRY AND SLURRY SCREENINGS

SCRAP METAL

SHOP ABRASIVES

SILICA

SLAG

SUMP MUD

SWEEPINGS

WASTEWATER TREATMENT FILTER PRESS CLOTHS

WATER TREATMENT SLUDGES, FILTER CAKES, AND RESIDUES

[RULE 1401, 12-7-1990; **RULE 407, 4-2-1982**]

[Devices subject to this condition : D128]

B295.1 For the purpose of SOX RECLAIM emission factor, the material shall be defined as the amount of feed material charged to the rotary dryer.

[**RULE 2011, 12-7-1995**; RULE 2011, 4-9-1999]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D115]

B295.2 For the purpose of NOX RECLAIM emission factor, the material shall be defined as the amount of sodium nitrate added.

[RULE 2012, 5-6-2005]

[Devices subject to this condition : D7, D9, D11, D13, D15, D17, D19, D24, D26, D28, D30, D32, D34, D36]

B295.3 For the purpose of SOX RECLAIM emission factor, the material shall be defined as the amount of sulfur added.

[RULE 2011, 5-6-2005]

[Devices subject to this condition : D7, D9, D11, D13, D15, D17, D19, D24, D26, D28, D30, D32, D34, D36]

C. Throughput or Operating Parameter Limits

C1.2 The operator shall limit the material processed to no more than 178.32 ton(s) in any one day.

For the purpose of this condition, material processed shall be defined as the total weight of all materials charged to the cupola furnace. This condition shall not apply to baghouse dust generated on-site.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1401, 12-7-1990]

[Devices subject to this condition : D128]

C1.3 The operator shall limit the material processed to no more than 439.2 ton(s) in any one day.

For the purpose of this condition, material processed shall be defined as the total weight of all materials charged to the reverberatory furnace. This total weight shall be the same as the total weight of all materials charged to the rotary dryer furnace.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1401, 12-7-1990**]

[Devices subject to this condition : D119]

- C1.4 The operator shall limit the material processed to no more than 21.5 ton(s) in any one day.

For the purpose of this condition, material processed shall be defined as the combined total amount of carbon coke and "additional plastic and rubber" charged to the reverberatory furnace. For the purpose of this condition, "additional plastic and rubber" shall be defined as the amount of plastic and rubber material which is capable of being separated by the raw material preparation system.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1401, 12-7-1990**]

[Devices subject to this condition : D119]

- C6.1 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 1500 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the burner end of the rotary dryer furnace, in degrees Fahrenheit.

The operator shall also install and maintain a device to continuously record the parameter being measured.

The measuring device or gauge shall be accurate to within plus or minus 30 degrees Fahrenheit. It shall be calibrated once every 12 months.

[**RULE 1303(a)(1)-BACT, 5-10-1996**]

[Devices subject to this condition : D115]

- C6.2 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 400 Deg F.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the baghouse inlet duct, in degrees Fahrenheit.

The operator shall also install and maintain a device to continuously record the parameter being measured.

The measuring device or gauge shall be accurate to within plus or minus 30 degrees Fahrenheit. It shall be calibrated once every 12 months.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C144]

- C6.3 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 500 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the baghouse inlet duct, in degrees Fahrenheit.

The operator shall also install and maintain a device to continuously record the parameter being measured.

The measuring device or gauge shall be accurate to within plus or minus 10 degrees Fahrenheit. It shall be calibrated once every 12 months.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C40, C41, C45]

- C6.4 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 150 Deg F.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the baghouse inlet duct, in degrees Fahrenheit.

The operator shall also install and maintain a device to continuously record the parameter being measured.

The measuring device or gauge shall be accurate to within plus or minus 30 degrees Fahrenheit. It shall be calibrated once every 12 months.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C156, C157]

- C8.1 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, is not less than 1400 Deg F.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- A) For the purpose of this condition, the temperature gauge shall be located at a distance not less than 7'-10" (7 feet and 10 inches) downstream of the burner location in the afterburner combustion chamber.
- B) For the purpose of this condition, the temperature gauge may be either a fixed installation, a mechanically retractable installation, and/or a manually retractable installation.
- C) The operator shall also install and maintain a device to continuously record the parameter being measured.
- D) The measuring device or gauge shall be accurate to within plus or minus 42 degrees Fahrenheit. It shall be calibrated once every 12 months.
- E) During operation of the cupola furnace (including startup and shutdown), the temperature readings of the temperature gauge described in this condition shall be recorded continuously.
- F) During cold startup of the cupola furnace, the temperature gauge shall indicate at least 1400 Degrees Fahrenheit prior to the initiation of carbon coke and/or furnace feed material charging in the cupola furnace.
- G) During shutdown of the cupola furnace, the temperature gauge shall indicate at least 1400 Degrees Fahrenheit until all combustion activity in the cupola furnace has ceased. For the purpose of this condition, combustion activity is defined as burning or smoldering of carbon coke and/or any other organic material in the cupola furnace as evidenced by the presence of incandescent light and visible emissions.
- H) This condition applies to requirements for afterburner operation. In addition to these requirements, the other parts of the air pollution control system serving the cupola furnace, including but not limited to, baghouses and scrubbers shall remain in full operation as long as there is the presence of any molten lead or molten slag inside of the cupola furnace.
- I) During periods of breakdown or malfunction, the operator shall comply with

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

the breakdown and notification requirements in Rule 430. In addition, when a breakdown or malfunction of this equipment results in an event which results in non-compliance with the temperature limit in this condition, the operator shall file a Title V deviation report in accordance with the provisions of Rule 3004.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1401, 12-7-1990; RULE 407, 4-2-1982]

[Devices subject to this condition : C44]

- C8.2 The operator shall use this equipment in such a manner that the flow rate being monitored, as indicated below, is not less than 280 gpm.

To comply with this condition, the operator shall install and maintain a(n) flow meter to accurately indicate the flow rate in the liquid supply lines to the venturi scrubber and the tray-type scrubber, in gallons per minute.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C42, C43]

- C8.3 The operator shall use this equipment in such a manner that the pH being monitored, as indicated below, is not less than 7 of the pH scale.

To comply with this condition, the operator shall install and maintain a(n) pH meter to accurately indicate the pH in the recirculation tank serving the scrubber.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C42, C43]

- C8.4 The operator shall use this equipment in such a manner that the flow rate being monitored, as indicated below, is not less than 110 gpm.

To comply with this condition, the operator shall install and maintain a(n) flow meter to accurately indicate the flow rate in the scrubber liquid recirculation line, in gallons per minute.

[RULE 1303(a)(1)-BACT, 5-10-1996]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : C165]

- C8.5 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, is not less than 20 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the venturi scrubber and the tray-type scrubber, in total inches water column.

This condition shall only apply when this equipment serve the cupola furnace only.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1401, 12-7-1990]

[Devices subject to this condition : C42, C43]

- C8.6 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, is not less than 26 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the venturi scrubber and the tray-type scrubber, in total inches water column.

This condition shall only apply when this equipment serve the reverberatory furnace only.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1401, 12-7-1990]

[Devices subject to this condition : C42, C43]

- C8.7 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, is not less than 36 inches water column.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the venturi scrubber and the tray-type scrubber, in total inches water column.

This condition shall only apply when this equipment serve the cupola and the reverberatory furnaces simultaneously.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1401, 12-7-1990]

[Devices subject to this condition : C42, C43]

- C8.9 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, is not less than 1500 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the regenerative thermal oxidizer (RTO), in degrees Fahrenheit.

Each temperature measuring device shall be equipped with a chart recorder to continuously monitor and record the temperature in the RTO.

Each temperature measuring device shall be accurate to within plus or minus 45 degrees Fahrenheit. Each device shall be calibrated once every 12 months.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1401, 9-10-2010; **RULE 407, 4-2-1982**]

[Devices subject to this condition : C199, C205]

- C8.10 The operator shall use this equipment in such a manner that the flow rate being monitored, as indicated below, is not less than 800 gpm.

To comply with this condition, the operator shall install and maintain a(n) flow meter to accurately indicate the flow rate in the liquid supply lines to the venturi scrubber and the tray-type scrubber, in gallons per minute.

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

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : C202]

- C8.11 The operator shall use this equipment in such a manner that the flow rate being monitored, as indicated below, is not less than 650 gpm.

To comply with this condition, the operator shall install and maintain a(n) flow meter to accurately indicate the flow rate in the liquid supply lines to the venturi scrubber and the tray-type scrubber, in gallons per minute.

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

[Devices subject to this condition : C203]

- C8.12 The operator shall use this equipment in such a manner that the pH being monitored, as indicated below, is not less than 6.5 of the pH scale.

To comply with this condition, the operator shall install and maintain a(n) pH meter to accurately indicate the pH in the recirculation tank serving the scrubber.

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

[Devices subject to this condition : C202, C203]

- C8.13 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, is not less than 35 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the venturi scrubber and the tray-type scrubber, in total inches water column.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1401, 9-10-2010]

[Devices subject to this condition : C202, C203]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

C303.1 The operator shall limit oxygen enrichment percent to between the amount specified by the following equation: $OE = (OF \times 100) / (OF + AF)$

where:

- OE = oxygen enrichment percent.
- OF = standard cubic feet of gaseous oxygen supplied to a set of burners in any one day.
- AF = standard cubic feet of air supplied to a set of burners in any one day.
- and where the value of OE is limited to the following amount:.
- for the reverberatory furnace, OE = 2.0 to 13.0 percent.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1401, 12-7-1990; RULE 407, 4-2-1982**]

[Devices subject to this condition : D119]

D. Monitoring/Testing Requirements

D12.1 The operator shall install and maintain a(n) triboelectric-type broken bag detector to accurately indicate the existence of a leak in the cartridge filters.

The measuring device or gauge shall be accurate to within the limits defined in the calibration protocol from the manufacturer. It shall be calibrated once every 12 months.

The continuous monitoring system shall include visual and audio alarms.

[**RULE 1303(a)(1)-BACT, 5-10-1996**]

[Devices subject to this condition : C204]

D12.2 The operator shall install and maintain a(n) flow meter to accurately indicate the flow rate in the oxygen gas supply line to this equipment, in total standard cubic feet.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[**RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1401, 12-7-1990]

[Devices subject to this condition : D119]

- D12.3 The operator shall install and maintain a(n) pressure gauge to accurately indicate the pressure in the oxygen gas supply line to this equipment, in pounds per square inch.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1401, 12-7-1990]

[Devices subject to this condition : D119]

- D12.4 The operator shall install and maintain a(n) flow meter to accurately indicate the flow rate in the combustion air supply line to this equipment, in total standard cubic feet.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1401, 12-7-1990]

[Devices subject to this condition : D119]

- D12.5 The operator shall install and maintain a(n) triboelectric-type broken bag detector to accurately indicate the existence of a leak in the baghouse bags.

The measuring device or gauge shall be accurate to within the limits defined in the calibration protocol from the manufacturer. It shall be calibrated once every 12 months.

The continuous monitoring system shall include visual and audio alarms.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1407, 7-8-1994]

[Devices subject to this condition : C40, C41, C45, C144]

- D12.6 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 1407, 7-8-1994]

[Devices subject to this condition : C40, C41, C45, C46, C47, C48, C144, C156, C157]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D12.7 The operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the baghouse inlet duct, in degrees Fahrenheit.

The operator shall also install and maintain a device to continuously record the parameter being measured.

The measuring device or gauge shall be accurate to within plus or minus 30 degrees Fahrenheit. It shall be calibrated once every 12 months.

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

[Devices subject to this condition : C46, C156, C157]

D12.8 The operator shall install and maintain a(n) non-resettable totalizing fuel meter to accurately indicate the fuel usage in the natural gas supply line to this equipment, in standard cubic feet.

[RULE 2012, 12-7-1995; RULE 2012, 4-9-1999]

[Devices subject to this condition : D7, D9, D11, D13, D15, D17, D19, D24, D26, D28, D30, D32, D34, D36, D115, D119]

D12.10 The operator shall install and maintain a(n) sensor to accurately indicate the existence of a leak in the the baghouse bags.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C46, C47, C48, C156, C157]

D12.11 The operator shall install and maintain a(n) flow meter to accurately indicate the flow rate in the baghouse inlet or outlet duct, in feet per minute.

[RULE 1407, 7-8-1994]

[Devices subject to this condition : C40, C41, C45, C46, C47]

D12.12 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the scrubber, in inches water column.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C165]

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

The pressure differential across the HEPA filter mist eliminator shall not exceed 3.0 inches water column.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1420, 9-11-1992]

[Devices subject to this condition : C172]

- D12.16 The operator shall install and maintain a(n) flow meter to accurately indicate the flow rate in the baghouse inlet or outlet duct, in feet per minute.

[RULE 1407, 7-8-1994]

[Devices subject to this condition : C156, C157]

- D12.17 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the cartridge filters, 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 : C204]

- D12.18 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the HEPA filter dust collector, in inches water column.

The pressure differential across the HEPA filter dust collector shall not exceed 3.0 inches water column.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1420, 9-11-1992]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : C184]

- D12.19 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the the HEPA filter dust collector, in inches water column.

The pressure differential across the HEPA filter dust collector shall not exceed 4.0 inches water column.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1420, 9-11-1992]

[Devices subject to this condition : C192, C195, C196, C200, C201]

- D12.20 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure in the furnace, in inches water column.

A. The pressure differential gauge shall be installed, operated, and maintained pursuant to the requirements in condition E448.13.

B. The furnace shall be operated such that static differential furnace pressure, in inches of water column averaged over 30 minutes, is maintained at a value -0.02 or more negative, except as specified in condition E448.13.

[RULE 1420.1, 3-7-2014]

[Devices subject to this condition : D119, D128]

- D82.1 The operator shall install and maintain a CEMS to measure the following parameters:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

NOx concentration in PPMv

SOx concentration in PPMv

CO concentration in ppmv

The CEMS will convert the actual NOx, SOx and CO concentrations to mass emission rates (lbs/hr) and record the hourly emission rates on a continuous basis.

The CEMS shall be installed and maintained to totalize the exhaust gas flow rate, in dry standard cubic feet.

The SOx emissions in the common cupola and reverb scrubber stack outlet shall be quantified based on a concentration limit for SOx and total exhaust gas flow rate measured by the NOx CEMS, prior to the installation of the SOx CEMS.

The SOx concentration limit shall be equal to 1.80 PPMv at actual stack conditions, prior to the installation of the SOx CEMS. Concentrations and exhaust gas flow rates measured by the CEMS shall be based on dry, standard conditions.

Exide shall submit an application and protocol to certify the SOx CEMS to measure SOx emissions, not later than 60 days following the issue date of this permit.

The concentration limits for the reverberatory and cupola furnaces shall not be used for emission reporting purposes subsequent to the certification of the SOx CEMS.

The source test report for the SOx CEMS certification shall be submitted to the SCAQMD not later than 180 days of initial startup of the new venturi scrubber, tray scrubber, and cupola thimble hood enclosure RTO of device nos. C202, C203 and C205, respectively.

Written results shall be submitted to the SCAQMD within 60 days after testing of the SOx CEMS is complete.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[RULE 2011, 5-6-2005; RULE 2012, 5-6-2005; RULE 407, 4-2-1982]

[Devices subject to this condition : S139]

D182.5 The operator shall test this equipment in accordance with the following specifications:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A. The owner or operator shall conduct a source test of all stack outlets serving air pollution control systems controlling sources of lead emissions at least annually to demonstrate compliance with the control standards specified in Rule 1420.1 (f), and with the source test requirements in Rule 1420.1 (k).

B. If the results of the most recent source test for a lead point source demonstrating compliance with the lead emission standard of Rule 1420.1 (f) demonstrate emissions of 0.0025 pounds of lead per hour or less, the next test for that lead point source shall be performed no later than 24 months after the date of the most recent test.

C. The source tests shall measure the emissions of total lead discharged to the atmosphere and shall be performed in triplicate for each stack outlet.

D. The average of triplicate samples, obtained according to approved test methods specified in this condition, shall be used to determine compliance with Rule 1420.1.

E. Source tests shall be conducted while operating at a minimum of 80% of equipment maximum capacity and in accordance with any of the following applicable test methods:

(1) SCAQMD Method 12.1 - Determination of Inorganic Lead Emissions from Stationary Sources Using a Wet Impingement Train.

(2) ARB Method 12 - Determination of Inorganic Lead Emissions from Stationary Sources.

(3) EPA Method 12 - Determination of Inorganic Lead Emissions from Stationary Sources.

(4) ARB Method 436 - Determination of Multiple Metal Emissions from Stationary Sources.

F. The maximum emission rate for any single stack shall not exceed 0.010 pounds of lead per hour.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

G. The total facility and maximum emission rates shall be determined using the most recent source tests conducted by the facility or the District.

[RULE 1420.1, 3-7-2014]

[Devices subject to this condition : S142, S145, S158]

D182.7 The operator shall test this equipment in accordance with the following specifications:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- A) The test(s) shall be conducted and a written report submitted to the SCAQMD not later than 180 days of initial startup of the new HEPA dust collectors.
- B) The test(s) shall measure the emissions of total lead at the inlet of the baghouse and the outlet of the HEPA filter dust collector. The tests shall also measure the emissions of total arsenic at the outlet of the HEPA filters. Triplicate source tests shall be conducted simultaneously on the inlet and outlet of this air pollution control system in accordance with the requirements set forth by Rules 1420 (e)(2) and 1420.1 (k).
- C) Triplicate source tests shall be conducted for exhaust gas lead concentration in the HEPA dust collector 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 all applicable rules.
- D) The operator shall ensure that all eight (8) compartments of the baghouse of device C48 are in operation during these source test runs. If operation of this baghouse is normally performed with only four compartments in operation at any one time, then the operator shall perform separate sets of the triplicate, simultaneous inlet/outlet tests specified in subparts A, B, and C of these conditions for each parallel set of four compartments.
- E) The tests shall be conducted while the cupola furnace is operated under normal operating conditions.
- F) The source tests shall be performed by a qualified testing laboratory, conducted in accordance with acceptable SCAQMD procedures and monitored by a SCAQMD representative.
- G) The Rule 1420 source tests shall be conducted by a qualified testing contractor approved for rule 1420 testing.
- H) Written notice shall be provided to the SCAQMD at least 10 days prior to testing so that an SCAQMD observer may be present during the tests.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

I) Sampling facilities shall comply with the attached SCAQMD guidelines for the construction of sampling and testing facilities, pursuant to rule 217.

J) Written results shall be submitted to the SCAQMD within 60 days after testing.

[RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; **40CFR 63 Subpart X, 6-23-2003**]

[Devices subject to this condition : C48, S142, C192]

D182.8 The operator shall test this equipment in accordance with the following specifications:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A) The test(s) shall be conducted and a written report submitted to the SCAQMD not later than 180 days of initial startup of the enclosures for the scrubber and HEPA filters.

B) The test(s) shall measure the emissions of total lead at the inlet of the scrubber and the outlet of the HEPA filters. The tests shall also measure the emissions of total arsenic at the outlet of the HEPA filters. Triplicate source tests shall be conducted simultaneously on the inlet and outlet in accordance with the requirements set forth by Rules 1420 (e)(2) and 1420.1 (k).

C) Triplicate source tests shall be conducted for exhaust gas lead concentration in the HEPA filter exhaust 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 Raw Material Preparation System is operated under normal operating conditions.

E) The source tests shall be performed by a qualified testing laboratory and conducted in accordance with acceptable SCAQMD procedures.

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 SCAQMD at least 10 days prior to testing so that an SCAQMD observer may be present during the tests, if the SCAQMD decides to have an observer present.

H) Sampling facilities shall comply with the SCAQMD "guidelines for the construction of sampling and testing facilities", pursuant to rule 217.

I) Written results shall be submitted to the SCAQMD within 60 days after testing.

[RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; **40CFR 63 Subpart X, 6-23-2003**]

[Devices subject to this condition : C165, S166, C172]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

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

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- A) The test(s) shall be conducted and a written report submitted to the SCAQMD not later than 180 days of initial startup of the new HEPA dust collectors.
- B) The test(s) shall measure the emissions of total lead at the inlet of the baghouse and the outlet of the HEPA filter dust collector. The tests shall also measure the emissions of total arsenic, benzene and 1,3-butadiene at the outlet of the HEPA filters. Triplicate source tests shall be conducted simultaneously on the inlet and outlet of this air pollution control system in accordance with the requirements set forth by Rules 1420 (e)(2) and 1420.1 (k).
- C) Triplicate source tests shall be conducted for exhaust gas lead concentration in the HEPA dust collector 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 all applicable rules.
- D) The tests shall be conducted while the baghouse of device C47 is operated under normal operating conditions.
- E) The tests shall be conducted while the reverberatory furnace is operated under normal operating conditions.
- F) The source tests shall be performed by a qualified testing laboratory, conducted in accordance with acceptable SCAQMD procedures and monitored by a SCAQMD representative.
- G) The Rule 1420 source tests shall be conducted by a qualified testing contractor approved for Rule 1420 testing.
- H) Written notice shall be provided to the SCAQMD at least 10 days prior to testing so that an SCAQMD observer may be present during the tests.
- I) Sampling facilities shall comply with the attached SCAQMD guidelines for the construction of sampling and testing facilities, pursuant to rule 217.
- J) Written results shall be submitted to the SCAQMD within 60 days after testing.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; **40CFR 63
Subpart X, #02, 6-23-2003**]

[Devices subject to this condition : C47, S141, C195]

D182.10 The operator shall test this equipment in accordance with the following specifications:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- A) The test(s) shall be conducted and a written report submitted to the SCAQMD not later than 180 days of initial startup of the new HEPA dust collectors.
- B) The test(s) shall measure the emissions of total lead at the inlet of the baghouse and the outlet of the HEPA filter dust collector. The tests shall also measure the emissions of total arsenic, benzene and 1,3-butadiene at the outlet of the HEPA filters. Triplicate source tests shall be conducted simultaneously on the inlet and outlet of this air pollution control system in accordance with the requirements set forth by Rules 1420 (e)(2) and 1420.1 (k).
- C) Triplicate source tests shall be conducted for exhaust gas lead concentration in the HEPA dust collector 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 all applicable rules.
- D) The tests shall be conducted while the baghouse of device C46 is operated under normal operating conditions.
- E) The tests shall be conducted while the cupola furnace is operated under normal operating conditions.
- F) The source tests shall be performed by a qualified testing laboratory, conducted in accordance with acceptable SCAQMD procedures and monitored by a SCAQMD representative.
- G) The Rule 1420 source tests shall be conducted by a qualified testing contractor approved for Rule 1420 testing.
- H) Written notice shall be provided to the SCAQMD at least 10 days prior to testing so that an SCAQMD observer may be present during the tests.
- I) Sampling facilities shall comply with the attached SCAQMD guidelines for the construction of sampling and testing facilities, pursuant to rule 217.
- J) Written results shall be submitted to the SCAQMD within 60 days after testing.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; **40CFR 63 Subpart X, 6-23-2003**]

[Devices subject to this condition : C46, S140, S158, C196, C200, C201]

D182.11 The operator shall test this equipment in accordance with the following specifications:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A. This condition defines specific groups of compounds which shall be tested as stated in D182.x conditions, where applicable, contained in this Facility Permit. (For the purposes of this condition, x is the specific condition number.) Refer to each D182.x condition for specific requirements, where applicable.

B. The tests shall be performed to measure the emissions to the atmosphere at the air pollution control system (APCS) stack outlet of the following compounds while the process equipment is operated at maximum capacity and maximum potential to emit.

C. Tests shall include, but may not be limited to, a test for the following compounds in each air pollutant group:

Group 1: Rule 1407 and 1420.1 Toxic Metals:

Total Arsenic

Total Cadmium

Total Lead

Group 2: Additional Toxic Metals

Total Beryllium

Hexavalent Chromium

Total Cobalt

Total Copper

Total Manganese

Total Mercury

Total Nickel

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Total Selenium

Total Vanadium

Group 3: Rule 1420.1 Toxic Organic Compounds

Benzene

1,3-Butadiene

Group 4: Additional Toxic Organic Compounds

Carbon Tetrachloride

Chlorobenzene

Chloroform

1,2-Dibromoethane

1,4-Dichlorobenzene

1,2-Dichloroethane

1,1-Dichloroethene

1,4-Dioxane

Ethylbenzene

Methylene Chloride

Styrene

1,1,2,2,-Tetrachloroethane

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Tetrachloroethene

Toluene

1,1,2-Trichloroethane

Trichloroethene

Vinyl Chloride

o-Xylene

m,p-Xylenes

Polychlorinated Dibenzo-p-dioxins (PCDD's)

Polychlorinated Dibenzofurans (PCDF's)

Polychlorinated Biphenyls (PCB's)

Polynuclear Aromatic Hydrocarbons (PAH's)

Hydrogen Sulfide

Formaldehyde

Acetaldehyde

Group 5: RECLAIM Emissions

Oxides of Nitrogen

Oxides of Sulfur

Group 6: Criteria Emissions

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Total non-methane hydrocarbons

Carbon Monoxide

Particulate Matter Less Than 10 microns (PM10)

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 1401, 9-10-2010; RULE 1402, 3-4-2005; RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; RULE 2011, 5-6-2005; RULE 2012, 5-6-2005; RULE 404, 2-7-1986; RULE 405, 2-7-1986; RULE 407, 4-2-1982; RULE 409, 8-7-1981; 40CFR 60 Subpart L, 12-3-1976; 40CFR 63 Subpart X, 6-23-2003]

[Devices subject to this condition : S139, S140, S141, S142, S145, S158, S166, C199]

D182.12 The operator shall test this equipment in accordance with the following specifications:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- A) The test(s) shall be conducted and a written report submitted to the SCAQMD not later than 180 days of initial startup of the regenerative thermal oxidizers (RTO's).
- B) Triplicate test(s) shall be performed to measure the emissions to the atmosphere of the compounds listed in air pollutant group numbers 1, 3, 5, and 6 defined in condition D182.11. In addition, the test(s) shall measure the inlet emission rates as required in condition D182.13, to determine if the RTO is performing as expected to meet Rule 1402 and BACT requirements.
- C) Tests for NO_x and SO_x shall be performed pursuant to the protocol requirements in Rules 2012 and 2011, respectively.
- D) A source testing plan shall be submitted to the SCAQMD for approval at least 60 days prior to testing. All tests shall be conducted in accordance with the plan as approved.
- E) Written notice shall be provided to the SCAQMD at least 10 days prior to testing so that an SCAQMD observer may be present during the tests.
- F) The source tests shall be performed by a qualified testing laboratory and conducted in accordance with SCAQMD approved procedures.
- G) Sampling facilities shall comply with the SCAQMD "Guidelines For The Construction Of Sampling And Testing Facilities", pursuant to Rule 217.
- H) Written results shall be submitted to the SCAQMD within 60 days after testing and shall include the items listed in condition E448.11.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 1401, 9-10-2010; RULE 1402, 3-4-2005; RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; RULE 2011, 5-6-2005; RULE 2012, 5-6-2005; RULE 404, 2-7-1986; RULE 405, 2-7-1986; RULE 407, 4-2-1982; RULE 409, 8-7-1981; 40CFR 63 Subpart X, 6-23-2003]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : S145, C199, C205]

D182.13 The operator shall test this equipment in accordance with the following specifications:

A) Triplicate tests shall be performed to measure the emissions at the regenerative thermal oxidizer (RTO) inlets for RTO's installed on the outlet of the rotary dryer HEPA filter and the RTO venting the cupola furnace thimble hood enclosure.

B) The respective tests shall be performed while the rotary dryer furnace and reverberatory furnace are operated at maximum capacity in the case of the rotary dryer RTO and while the cupola furnace is operating at maximum capacity in the case of the cupola furnace thimble enclosure RTO.

C) The tests at the rotary dryer RTO inlet shall be performed simultaneously with the tests for these compounds at the rotary dryer RTO outlet.

D) The tests at the cupola thimble hood enclosure RTO inlet shall be performed simultaneously with the tests for these compounds at the common scrubber stack outlet serving the reverberatory and cupola furnace air pollution control systems.

E) The tests shall include, but may not be limited to, a test for:

1,3-Butadiene

Benzene

Total and non-methane hydrocarbons

Carbon Monoxide

[RULE 1401, 9-10-2010; RULE 1402, 3-4-2005]

[Devices subject to this condition : S145, C199, C205]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D182.14 The operator shall test this equipment in accordance with the following specifications:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- A) The test(s) shall be conducted and a written report submitted to the SCAQMD not later than 180 days of initial startup of the new venturi and tray scrubbers.
- B) The source tests shall be performed ONLY after the smoke tests demonstrate complete smoke capture as stated in condition E448.12. Source tests performed without the required initial smoke tests shall be considered non-representative and shall be repeated.
- C) Triplicate test(s) shall be performed to measure the emissions to the atmosphere of the compounds listed in air pollutant group numbers 1, 2, 3, 4, 5 and 6 defined in condition D182.11. The tests shall be performed at the outlets of the scrubbers of devices C43 and C203, each.
- D) Test(s) shall also be performed to measure the inlet emission rates as required in condition D182.15, to determine if the air pollution control systems are performing as expected to meet Rule 1402, Rule 1407, RULE 1420 and BACT requirements.
- E) Pursuant to the Risk Reduction Plan and Rule 1402, Exide is required to conduct source tests upon completion of the upgrades. If the above-referenced source tests are conducted at less than 85 percent of its current permitted charge rate limits for each furnace, within 30 days of approval of those source test results by the District, Exide shall submit a permit application to the District for change of conditions to reduce charge rates.
- F) If permit application(s) for change of conditions are required by part E of this condition, Exide shall request a commensurate reduction in its permitted charge rate limits for the applicable furnaces to charge rates such that the source tested charge rates are equivalent to 85 percent of the proposed permitted charge rates.
- G) For the purpose of parts E and F of this condition, the daily process weight limit for each furnace shall be calculated by multiplying the average process weight demonstrated during each set of the three test runs for each furnace, in pounds per hour each, by a factor of 24. The calculated average process weight shall be the average of the process weights in the three test runs.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

H) The daily limits calculated in part G of this condition, in pounds per day, for each furnace, shall be divided by a factor of 2,000 and the limit set in the permit in units of tons per day, respectively, for each furnace.

I) Exide shall ensure that the instantaneous process weights for each furnace are recorded during each test run and the total amounts of process weight charged to each furnace is integrated for the duration of each and every test run.

J) If separate sets of triplicate test runs are required for the quantification of metals, and of any other compounds, the average throughput limits calculated pursuant to this condition shall be based on the test runs where arsenic emissions are measured.

K) Exide shall plan the availability of feed materials in advance prior to each set of source tests in order to ensure compliance with the requirements in this condition.

L) Elemental arsenic additions shall be performed in the pot furnaces vented by the baghouse of device C41 during at least one of the source test runs performed to quantify arsenic emissions.

M) Exide shall prepare and submit a detailed log of the elemental arsenic additions made to each of the lead refining furnaces vented to cupola baghouse 2 (Device C41) during each test run. This special log shall be included as part of the source test report submitted to the SCAQMD.

N) The special log of subpart M of this condition shall record the following information:

Calendar date

Test run number

Test run start and stop time

Pot furnace identification(s)

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Chronological time

Pounds of elemental arsenic charged to each pot furnace

O) The source tests for metals shall be performed in accordance with ARB Method 436 - Determination of Multiple Metal Emissions from Stationary Sources.

P) Tests for NO_x and SO_x shall be performed pursuant to the protocol requirements in Rules 2012 and 2011, respectively.

Q) Written notice shall be provided to the SCAQMD at least 7 days prior to testing so that an SCAQMD observer may be present during the tests.

R) Sampling facilities shall comply with the attached SCAQMD "guidelines for the construction of sampling and testing facilities", pursuant to rule 217.

S) Exide shall ensure that there are enough personnel available during each test run to collect and report all of the required information as noted in conditions A through P. Written results shall be submitted to the SCAQMD within 60 days after testing is completed.

T) A source testing plan shall be submitted to the SCAQMD for approval at least 60 days prior to testing. All tests shall be conducted in accordance with the plan as approved.

U) Written notice shall be provided to the SCAQMD at least 10 days prior to testing so that an SCAQMD observer may be present during the tests.

V) The source tests shall be performed by a qualified testing laboratory and conducted in accordance with SCAQMD approved procedures.

W) Sampling facilities shall comply with the SCAQMD "Guidelines For The Construction Of Sampling And Testing Facilities", pursuant to Rule 217.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

X) Written results shall be submitted to the SCAQMD within 60 days after testing and shall include the items listed in condition E448.11.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 1401, 9-10-2010; RULE 1402, 3-4-2005; RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; RULE 2011, 5-6-2005; RULE 2012, 5-6-2005; RULE 404, 2-7-1986; RULE 405, 2-7-1986; RULE 407, 4-2-1982; RULE 409, 8-7-1981; 40CFR 63 Subpart X, 6-23-2003]

[Devices subject to this condition : C40, C41, C42, C43, C45, D128, D132, D133, S139]

D182.15 The operator shall test this equipment in accordance with the following specifications:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A) Triplicate tests shall be performed to measure the emissions listed in this condition at the inlets of cupola furnace baghouse no. 1 (device C45), cupola furnace baghouse no. 2 (device C41), and the reverberatory furnace baghouse (device C40).

B) The tests on the inlets of cupola baghouse nos. 1 and 2 (devices C41 and C45) shall be performed simultaneously with the tests for these compounds at the new tray scrubber outlet of device C203, prior to the junction with the common stack outlet of device S139.

C) The tests on the inlet of the reverberatory furnace baghouse (device C40) shall be performed simultaneously with the tests for these compounds at the existing tray scrubber outlet of device C43, prior to the junction with the common stack outlet of device S139.

D) Tests shall include, but may not be limited to, a test for:

Total arsenic

Total cadmium

Total lead

E) The tests shall demonstrate a minimum control efficiency of 99 percent, each, on both total arsenic and total cadmium emissions, pursuant to Rule 1407(d)(3).

F) At least three test runs for oxides of sulfur (SO_x) shall be performed at the inlets to the two venturi scrubbers of devices C42 and C202.

G) The inlet tests for SO_x on the inlet of device C42 shall be performed simultaneously with tests for SO_x at the outlet of the tray-type scrubber of device C43.

H) The inlet tests for SO_x on the inlet of device C202 shall be performed simultaneously with tests for SO_x at the outlet of the tray-type scrubber of device C203.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

I) The total number of test runs for SO_x shall be determined pursuant to the source test protocol requirements in Rule 2011.

[RULE 1401, 9-10-2010; RULE 1402, 3-4-2005; RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; **RULE 2005, 6-3-2011; RULE 2011, 5-6-2005**]

[Devices subject to this condition : C40, C41, C42, C43, C45, C202, C203]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D323.1 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 semi-annual basis, at least, unless the equipment did not operate during the entire semi-annual period. The routine semi-annual 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 that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). 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; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

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;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 8-11-1995]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D7, D9, D11, D13, D15, D17, D19, D24, D26, D28, D30, D32, D34, D36, C42, C43, C44, D115, D116, D119, D120, D121, D122, D123, D124, D125, D126, D127, D128, D129, D130, D131, D132, D133, D135, D136, D137, D138, S139, C143, C159, D161, C162, D164, C165, C172, D173, D183, C184, C192, C195, C196, D197, D198, C199, C200, C201, C202, C203, C204, C205]

- 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]

[Devices subject to this condition : C40, C41, C45, C46, C47, C48, S140, S141, S142, C144, S145, C156, C157, S158, C204]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D381.2 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 an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual 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]

[Devices subject to this condition : C160, C163, S166]

E. Equipment Operation/Construction Requirements

E71.1 The operator shall not use this equipment to process coal, sawdust, rubber, plastics, paper, rags, oil, or grease.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1401, 12-7-1990]

[Devices subject to this condition : D7, D9, D11, D13, D15, D17, D19, D24, D26, D28, D30, D32, D34, D36]

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

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1420, 9-11-1992]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : C40, C41, C45, C46, C47, C48, C144, C156, C157, C159, C160, C162, C163, C192, C195, C196, C200, C201, C204]

E193.1 The operator shall operate and maintain this equipment according to the following requirements:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- A. The triboelectric-type broken bag detector shall be maintained in full operation whenever the equipment it serves is in operation
- B. The operator shall operate and maintain the triboelectric-type broken bag detector with a continuous monitoring system consisting of visual and audible alarms.
- C. A printout of the high level alarm log shall be generated from the computer system interfaced with each broken bag detector system each calendar day. This printout shall be saved as a hard copy, or saved in electronic TIFF or PDF format each day. This printout shall display, in graphical form, the analog output signal from the triboelectric sensor.
- D. The detector shall be maintained in accordance with the specifications defined in the operating instructions from the manufacturer. The detector zero point calibration shall be performed not less than once every twelve months in accordance with the procedures specified by the manufacturer, as submitted under Application No. 466858, and/or as amended.
- E. Whenever the manufacturer(s) or current procedure(s) for setting the annual zero point on the triboelectric-type broken bag detectors changes, the operator shall submit a revised set of written procedures to the AQMD and shall make these procedures and associated records available upon request by AQMD personnel.
- F. For the purpose of this condition, a deviation shall be defined as the indication by the triboelectric-type broken bag detector alarm of the existence of a leak in the baghouse bags during the operation of the equipment it serves.
- G. Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective action, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective actions taken.
- H. All deviations shall be reported to the AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

in Section K of this permit. The semi-annual monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of this permit.

I. The operator shall submit an application with a Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if more than six deviations occur in any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

J. The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

K. The operator shall keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR 64.9 for a minimum of five years.

[RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; **40CFR 63 Subpart X, 6-23-2003;**
40CFR Part 64, 10-22-1997]

[Devices subject to this condition : C40, C41, C45, C46, C47, C144, C204]

E448.1 The operator 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.

[RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; **40CFR 63 Subpart X, 6-23-2003]**

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : C172, C192, C195, C196, C200, C201]

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

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

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

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

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, 3-7-2014]

[Devices subject to this condition : C175]

E448.4 The operator shall comply with the following requirements:

- 1) The HEPA filters used in this equipment shall be certified by the manufacturer to have a minimum control efficiency of 99.97 percent on 0.3 micron particles.
- 2) Dust collected in this equipment shall only be discharged into containers which shall be maintained closed after the disposal of dust from this equipment.
- 3) After use and/or whenever maintenance is performed on the HEPA vacuum sweeper, this equipment shall only be disassembled, emptied and/or cleaned within a total enclosure building which is vented to air pollution control system(s) which are in full use and which have been issued Permits to Construct and/or Operate by the Executive Officer of the AQMD.
- 4) Visible emissions shall not be discharged from any point on this equipment.
- 5) Identification tag(s) or name plate(s) shall be displayed on this equipment to show manufacturer model no. and serial no. The tag(s) or name plate(s) shall be affixed to this equipment in a permanent and conspicuous location.

[RULE 1420, 9-11-1992]

[Devices subject to this condition : C193, C194]

E448.6 The operator shall comply with the following requirements:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- 1) The spark arrestor system shall be in full operation whenever the rotary dryer baghouse (device C144) is in operation.
- 2) The spark arrestor system shall be tested and calibrated not less than once per year, and more often if necessary, to ensure the system is functioning properly.

[RULE 1420, 9-11-1992]

[Devices subject to this condition : B176]

E448.7 The operator shall comply with the following requirements:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A) Sodium nitrate added to the refining pot furnaces of device nos. D7, D9, D11, D13, D15, D17, D19, D24, D26, D28, D30, D32, D34, and D36, inclusive, shall only be charged by means of a screw conveyor feed system, except during a screw conveyor feed system malfunction.

B) The operator shall keep a log indicating the total pounds of sodium nitrate charged to each pot furnace with a screw conveyor feed system each day and the corresponding device number of each pot furnace to which sodium nitrate is charged with a screw conveyor feed system.

C) If the feed screw conveyor malfunctions, and the operator is required to charge sodium nitrate without a screw conveyor, the operator shall keep a log of the total pounds of sodium nitrate charged to each pot furnace without a screw conveyor feed system each day and the device number of each pot furnace to which sodium nitrate is charged without a screw conveyor feed system.

D) For the purpose of the RECLAIM NO_x emission factor from sodium nitrate, a factor of 0.017 LBS/LB shall be used when sodium nitrate charged to a pot furnace is performed only with a screw conveyor feed system.

E) For the purpose of the RECLAIM NO_x emission factor from sodium nitrate, a factor of 0.077 LBS/LB shall be used when sodium nitrate charged to a pot furnace is performed without a screw conveyor feed system.

F) The operator shall keep a log of each screw conveyor feed system malfunction event. This log shall include the date(s) and duration for each malfunction, reason(s) for each malfunction, and the action(s) taken to place the screw conveyor feed system back into operation following each malfunction.

G) The operator shall inspect and maintain all components of the sodium nitrate feed screw conveyor equipment on an annual basis, and more often if necessary, in accordance with the manufacturer's specifications.

[RULE 2012, 5-6-2005]

[Devices subject to this condition : D7, D9, D11, D13, D15, D17, D19, D24, D26, D28, D30, D32, D34, D36]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

E448.9 The operator shall comply with the following requirements:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- 1) The cupola furnace thimble automatic feed chute cover door shall be installed within 7 days after the issuance of this Permit to Construct.
- 2) The cupola furnace thimble automatic feed chute cover door shall only be opened during and for the purpose of adding feed material into the cupola furnace. Records shall be kept to demonstrate compliance with this condition.
- 3) Within 45 days of the issuance of this permit, a door position detection system, consisting of a photoelectric and/or electromechanical sensor, shall be installed at the cupola furnace thimble automatic feed chute cover door so as to indicate the door position as either open or closed.
- 4) The door position detector (DPD) shall be connected to a data acquisition system (DAS) equipped with either a circular chart recorder or a strip chart recorder. The data acquisition system shall process the information from this system and record the chronological time and duration of each open door event.
- 5) The time stamps from the DAS shall be synchronized with respect to the time of day, and shall be accurate to within plus or minus 180 seconds.
- 6) The DAS shall provide an electronic signal to the chart recorder which shall record a step change in amplitude for each open door event, for the duration that the door is open.
- 7) The DPD sensor and chart recorder device shall be electrically configured to be independent of any digital data acquisition device maintained at this facility for this same purpose.
- 8) The chart recorder shall be installed in the control room adjacent to the furnace area easily accessible to SCAQMD personnel. Each recorded chart shall be clearly identified with the calendar date(s), starting time, and ending time, that applies to the step marks recorded on each chart. Each chart shall also be signed by the shift supervisor present on duty at the time that the chart paper is replaced in the recorder.
- 9) A manual verification of proper functionality of the DAS and chart recorder

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

shall be performed every two hours initially until otherwise approved in writing by the SCAQMD. Exide shall record the result of each verification in a unique log readily available to SCAQMD personnel for inspection on a daily basis. The comment section of this log shall provide an explanation of causes and corrective actions taken (if required) in all cases where the DPD, DAS and/or the chart recorder malfunctions.

10) Not later than 30 days after this condition becomes effective, Exide shall submit a revised written Standard Operating Procedure (SOP) for the operation of the Cupola furnace system for SCAQMD approval. The written SOP shall comply with all requirements stated in this permit condition. Exide shall comply with the revised written SOP unless otherwise approved in writing by the SCAQMD.

11) Exide shall submit monthly reports documenting each missing data event, and all operational anomalies associated with the cupola furnace feed chute automatic door cover operation.

12) Each report required by subpart 11 of these conditions shall be submitted electronically to the SCAQMD's Toxics Compliance Team and Refinery and Waste Management Permitting Team not later than the 10th day of the following month, for each month in the first six months following the issue date of this permit, and semiannually thereafter.

13) The semiannual report required by subpart 12 of these conditions, covering January through June, inclusive, shall be submitted not later than August 31 of the same calendar year. The semiannual report covering July through December, inclusive, shall be submitted not later than February 28 of the following calendar year.

14) All hard copy chart records acquired pursuant to this condition shall be scanned on a daily basis into a PDF format file which cannot be edited. Exide shall keep and maintain all records required by this condition, including, but not limited to, malfunction events and recorder charts, in the hard copy and PDF file format.

15) All records required by this condition shall be kept onsite for a minimum of

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

five years and made available to SCAQMD personnel upon request. For those records which are generated in an electronic format, Exide shall comply with this condition by maintaining the hard copy and electronic formats of the records for a minimum of five years.

[RULE 1402, 3-4-2005]

[Devices subject to this condition : D133]

E448.10 The operator shall comply with the following requirements:

1. The minimum distance from the outlet side of the demister mesh pad in the scrubber section of this equipment and the inlet to the HEPA filter housing shall not be less than fifty three (53) inches.

2. Lines or markings and appropriate labels shall be displayed on the exterior housing of this equipment to clearly identify the physical locations of the outlet side of the demister mesh pad in the scrubber section of this equipment and the inlet to the HEPA filter housing.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; **RULE 204, 10-8-1993; 40CFR 63 Subpart X, 6-23-2003**]

[Devices subject to this condition : C165, C172]

E448.11 The operator shall comply with the following requirements:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A Rule 1402 facility-wide health risk assessment (HRA) shall be performed subject to the following conditions:

A) Upon approval of the source test report for the rotary dryer furnace air pollution control system, the two process venturi/tray scrubber systems at this facility, and the HEPA filter systems installed on the MAC baghouses, cupola feed room baghouse, and the soft and hard lead baghouses, detailed dispersion modeling and an HRA shall be performed based on the new emission rate data and based on instructions provided by the SCAQMD subsequent to approval of the source test report.

B) Within 60 days following the SCAQMD approval of the initial source test results, Exide shall submit a revised AB2588 HRA based on the approved source test results to determine the risk level (MICR and hazard indices) and the cancer burden.

C) Two copies of the HRA report shall be submitted to the SCAQMD (Attention: Energy/Public Services/Waste Management/Terminals Permitting.)

D) The HRA report prepared pursuant to this condition shall be used to demonstrate compliance with Rule 1402 requirements in conjunction with the Risk Reduction Plan submitted by Exide to the SCAQMD. The demonstrated risk shall not exceed the action risk levels as defined in Rule 1402 and the demonstration shall be completed within the timeline set forth in the rule.

[RULE 1402, 3-4-2005]

[Devices subject to this condition : S139, S140, S141, S142, S145, S158, S166]

E448.12 The operator shall comply with the following requirements:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- A) Smoke tests shall be performed on the cupola furnace slag tap hood and the cupola furnace thimble enclosure pursuant to the following requirements.
- B) A smoke device capable of generating 8,000 cubic feet of smoke shall be used, or an equivalent smoke device as approved by the Executive Officer.
- C) Smoke Test Procedure: Place a small open container or metal plate on a stable and flat area inside of the hood enclosure. Place the smoke device inside the container and/or on the plate. After lighting the smoke device, quickly close any access door(s) to avoid smoke from escaping. Let the smoke device completely burn. The entire space inside the enclosure will now be filled with the smoke. Observe for leaks of smoke from each seal, joint, and opening.
- D) Using a video camera, record the observations of the smoke test and make a qualitative assessment of any leaks of smoke. The video recording shall include a time stamp identifying the calendar date and the chronological time of each smoke test.
- E) Using the procedure in conditions C and D, perform a smoke test on the new cupola furnace thimble enclosure upon the initial cold start-up of the cupola furnace subsequent to the start of natural gas combustion in both the cupola furnace and afterburner, but prior to the initial coke, lead metal, and/or feed charge while the cupola furnace is warming up.
- F) Exide shall record video observations of the outside of the enclosure and, simultaneously, record video observations of the isolation door inside the enclosure with the existing isolation door video camera.
- G) Using the procedure in conditions C and D, perform a smoke test on the new cupola furnace thimble enclosure while the cupola furnace is in full operation and charging is occurring. Record video observations of the outside of the enclosure. Simultaneously, record video observations of the isolation door inside the enclosure with the existing isolation door video camera.
- H) Using the procedure in conditions C and D, perform a smoke test on the new slag tapping hood enclosure while the cupola furnace is in full operation. The

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

video records shall indicate that no smoke leaks occur at any point of the enclosure.

I) Using standard titanium tetrachloride smoke sticks, perform smoke tests of the two refining pot furnaces which will be used for arsenic additions. Record video of these events to demonstrate that no fugitive emissions escape capture by the pot furnace hoods.

J) Video files for both the internal and external smoke observations of the cupola furnace thimble hood enclosure, the cupola furnace slag tap smoke tests, and the refining pot furnace smoke tests shall be submitted to the SCAQMD (Attention: Energy/Public Services/Waste Management/Terminals Permitting).

K) The video files shall be submitted on compact disk or DVD in the avi or wmv Microsoft Windows video formats, or authored as standard NTSC MPEG2 DVD video disks.

L) The video files produced shall have calendar date and time stamps visible on each video frame.

M) The date and time stamps on the video files shall be synchronized with the network time associated with data acquisition of the processes at the Exide facility. The precision of the time synchronization for this purpose shall be accurate to within plus or minus 30 seconds.

N) The video records shall demonstrate that no smoke leaks occur from any point of the cupola thimble hood enclosure, the cupola furnace slag tapping port and the cupola charging cart tunnel opening.

[RULE 1401, 9-10-2010; RULE 1402, 3-4-2005; RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; **RULE 2005, 6-3-2011; RULE 2011, 5-6-2005**]

[Devices subject to this condition : D7, D9, D128, D132, D133]

E448.13 The operator shall comply with the following requirements:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

The following requirements shall apply to monitoring of static pressure differential inside of smelting furnaces at this facility for compliance with Rule 1420.1.

A) The monitoring device shall be approved by the Executive Officer pursuant to Rule 1420.1 (f)(4).

B) The monitoring device shall:

a. Continuously measure the instantaneous static differential furnace pressure.

b. Have a resolution of at least 0.01 inches water column.

c. Have an increment of measurement of 0.01 inches water column.

d. Have a range from -10 inches to +10 inches water column for the measuring device.

e. Be equipped with ports to allow for periodic calibration in accordance with manufacturer's specifications.

f. Be calibrated according to manufacturer's specifications at a frequency of not less than twice every calendar year.

g. Be equipped with a continuous data acquisition system (DAS). The DAS shall record the data output from the monitoring device at a frequency of not less than once every sixty (60) seconds.

h. Generate data files from the computer system interfaced with each DAS each calendar day.

i. Be maintained in accordance with manufacturer's specifications.

C) The data files required by part B of this condition shall be saved in electronic ASCII character format, Microsoft Excel (xls orxlsx) format, PDF format, or other format as approved by the Executive Officer.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D) The data files shall contain a table of chronological date and time and the corresponding data output value from the monitoring device in inches of water column. The operator shall prepare a separate data file each day showing the 30-minute average pressure readings recorded by this device each calendar day.

E) A reverberatory furnace may be operated at an alternative static differential furnace pressure if the owner or operator can demonstrate that it can achieve emission reductions that are equivalent to or better than those achieved when operating at a pressure of -0.02 or more negative.

a. Demonstration shall be based on source test protocols and source tests conducted pursuant to the requirements of subdivision Rule 1420.1(k) and approved by the Executive Officer.

b. The alternative static differential furnace pressure shall not exceed 0.4 inches water column and must be approved by the Executive Officer in the Continuous Furnace Pressure Monitoring Plan of Rule 1420 (f)(4).

[RULE 1420.1, 3-7-2014]

[Devices subject to this condition : D119, D128]

E448.14 The operator shall comply with the following requirements:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

The following requirements apply to the monitoring of air pollution control system (APCS) exhaust gas flow rates at this facility.

A) The nomenclature used to identify the individual air flow meters and/or pressure differential measuring devices is listed below and shall be used for monitoring, record keeping and reporting under this permit condition. Exhaust gas flow meters and/or pressure differential measuring devices shall be installed on the following exhaust duct locations associated with APCS No. 1 (serving the reverberatory furnace) and APCS No. 2 (serving the cupola furnace).

a. The exhaust duct directly connected to the pot furnaces of Device Nos. D7 and D9, prior to the connection of this duct with any other attached duct. This meter or device shall be identified as Measuring Device F7.

b. The exhaust duct directly connected to the slag tapping hood serving the cupola slag tapping port of Device D132, prior to the connection of this duct with any other attached duct. This meter or device shall be identified as Measuring Device F132.

c. The exhaust duct directly connected to the blower exhaust outlet of the RTO of Device C205, serving the cupola furnace thimble hoods, prior to the connection of this duct with any other attached duct. This meter or device shall be identified as Measuring Device F205.

d. The exhaust duct directly connected to the blower exhaust outlet of cupola furnace baghouse no. 1 of Device C45, serving the cupola furnace, prior to the connection of this duct with any other attached duct. This meter or device shall be identified as Measuring Device F45.

e. The exhaust duct directly connected to the blower exhaust outlet of cupola furnace baghouse no. 2 of Device C41, serving the cupola furnace, prior to the connection of this duct with any other attached duct. This meter or device shall be identified as Measuring Device F41.

f. The exhaust duct directly connected to the blower exhaust outlet of the reverberatory baghouse of Device C40, serving the reverberatory furnace, prior to

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

the connection of this duct with any other attached duct. This meter or device shall be identified as Measuring Device F40.

g. The exhaust duct section directly connected to the manual damper located between the venturi scrubbers of Device C42 and the scrubber of Device C202. This flow meter shall be installed adjacent to the manual damper on the side closest to device C42, prior to the connection of this run of duct with any other attached duct. This meter shall be identified as meter F42MD. This meter shall also be capable of indicating the relative direction of gas flow.

h. For the purpose of meter F42MD, a positive gas flow shall be defined as a flow towards device C42.

i. The ducts referenced in a. through g. of this condition shall be inspected at least annually for material build-up or other conditions that may contribute to the obstruction of air flow in the ducts. Any such material build-up or condition found that may contribute to such air flow obstruction shall be removed or remedied such that proper air flows are achieved based on original system design.

B) The operator shall record the following data for the measuring devices designated in this condition as F7, F40, F41, F45, F42MD F132, and F205. This data shall include the following:

a. Date

b. Time

c. Meter Identification

d. Actual meter reading in displayed units

e. The conversion factor from displayed and/or recorded units to flow rate

f. Flow rate in actual cubic feet per minute (ACFM)

g. Initials of person taking each reading, unless automated data is taken

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

C) The data logging required by this condition shall either be recorded manually or shall be recorded using a digital data acquisition system.

D) If the data is recorded manually, it shall be recorded not less than once per hour. If the data is recorded automatically, it shall be recorded on a one minute interval sampling rate.

E) If automatic monitoring is used, the monitoring devices shall:

a. Continuously measure the instantaneous flow rate.

b. Be calibrated according to manufacturer's specifications at a frequency of not less than once every calendar year.

c. Be equipped with a continuous data acquisition system (DAS). The DAS shall record the data output from the monitoring device at a frequency of not less than once every sixty (60) seconds.

d. Generate data files from the computer system interfaced with each DAS each calendar day. The data file shall be saved in electronic ASCII character format, Microsoft Excel (xls or.xlsx) format, PDF format, or other format as approved by the Executive Officer. The file shall contain a table of the data specified in this condition.

e. Be maintained in accordance with manufacturer's specifications.

F) For the purpose of this condition, Exide has the option of installing alternate parameter measuring devices including, but not limited to, pressure differential gauges and pressure transducers which measure and record a pressure reading which can be converted to a flow rate using appropriate conversion factors as indicated in subpart (B)(e) of this condition. The conversion factor shall be updated at least once every 12 calendar months.

[RULE 1401, 9-10-2010; RULE 1402, 3-4-2005; RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D7, D9, C40, C41, C42, C45, D132, C205]

H. Applicable Rules

H116.1 The operator shall ensure that the exhaust system conforms to design and operation specifications given in the most current edition of "Industrial Ventilation, Guidelines and Recommended Practices", published by the American Conference of Governmental and Industrial Hygienists (20th edition or thereafter) in order to comply with Rules 1407 and 1420 whenever the equipment vented by this air pollution control system is in operation.

[RULE 1407, 7-8-1994; RULE 1420, 9-11-1992]

[Devices subject to this condition : C40, C41, C45, C46, C47, C48, C144, C156, C157, C192, C195, C196, C200, C201]

H116.2 The operator shall be subject to the requirements stated in Rules 1407 and 1420 in order to comply with these rules whenever this equipment is in operation.

[RULE 1407, 7-8-1994; RULE 1420, 9-11-1992]

[Devices subject to this condition : D7, D9, D11, D13, D15, D17, D19, D24, D26, D28, D30, D32, D34, D36, C40, C41, C42, C43, C44, C45, C46, C47, C48, D115, D119, D128, C144, C192, C195, C196, C200, C201, C202, C203, C204]

H116.3 The operator shall ensure that the exhaust system conforms to design and operation specifications given in the most current edition of "Industrial Ventilation, Guidelines and Recommended Practices", published by the American Conference of Governmental and Industrial Hygienists (20th edition or thereafter) in order to comply with Rule 1420 whenever the equipment vented by this air pollution control system is in operation.

[RULE 1420, 9-11-1992]

[Devices subject to this condition : C159, C160, C162, C163, C165, C172, C184]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

H116.4 The operator shall ensure that the bag and/or filter leak detection system meets the requirements of 40 CFR Part 63, Subpart X, Sections 63.548 (e) (1) through (e) (8), and shall follow the procedures outlined in the USEPAs Fabric Filter Bag Leak Detection Guidance dated September 1997 or any revisions thereafter in order to comply with the National Emission Standards for Secondary Lead Smelting whenever this equipment is in operation.

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

[Devices subject to this condition : C40, C41, C45, C46, C47, C144, C156, C157, C204]

K. Record Keeping/Reporting

K67.2 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

The calendar dates on which triboelectric-type broken bag detector calibrations are performed.

A copy of the protocol from the manufacturer used to calibrate the triboelectric-type broken bag detector

Records from the baghouse inlet temperature recording device.

The calendar dates on which the baghouse inlet temperature indicating and recording device is calibrated.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1407, 7-8-1994]

[Devices subject to this condition : C40, C41, C45, C144]

K67.3 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Records from the baghouse inlet temperature recording device.

The calendar dates on which the baghouse inlet temperature indicating and recording device is calibrated.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1407, 7-8-1994]

[Devices subject to this condition : C46, C47]

K67.5 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

The total amount, in tons, of all materials charged to the cupola furnace each day.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1401, 12-7-1990]

[Devices subject to this condition : D128]

K67.7 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

A daily operating log documenting venturi and tray scrubber liquid flow rates, in gallons per minute, and liquid pH, with liquid flow rate entries made at intervals not to exceed 1 hour, and liquid pH entries made at intervals not to exceed 4 hours.

A daily operating log documenting venturi and tray scrubber pressure differentials, in inches water column, with entries made at intervals not to exceed 1 hour.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; 40CFR 63 Subpart X, 6-23-2003]

[Devices subject to this condition : C42, C43, C202, C203]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

K67.8 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Records from the afterburner temperature recording device.

The dates on which calibrations of the afterburner temperature recording devices are performed.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996; 40CFR 63 Subpart X, 6-23-2003]

[Devices subject to this condition : C44]

K67.9 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Records from the CEMS systems, including the following:

a. Average O₂ concentration, in volume percent, each 15 minutes.

b. Average CO concentration, in dry parts per million volume, each 15 minutes.

c. Average exhaust gas flow rate, in actual cubic feet per minute, each 15 minute period.

d. Average exhaust gas moisture, in volume percent, each 15 minute period.

e. Average exhaust gas temperature, in degrees Fahrenheit, each 15 minute period.

f. Total CO exhaust gas emission rate, in total pounds per each 15 minute period, in total pounds per each day, and in average pounds per day each calendar month.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996; 40CFR 63 Subpart X, 6-23-2003]

[Devices subject to this condition : S139]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

K67.10 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

The total quantity, in tons each, of total material, total carbon coke, and total additional plastic and rubber charged to the rotary dryer furnace each day.

The total quantity, in standard cubic feet, of natural gas consumed in the rotary dryer furnace each day.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1401, 12-7-1990]

[Devices subject to this condition : D115]

K67.11 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

The total quantity, in standard cubic feet, of natural gas consumed in the reverberatory furnace each day.

The total quantity, in standard cubic feet, of enrichment oxygen supplied to the reverberatory furnace each day.

The total quantity, in standard cubic feet, of combustion air, supplied to the reverberatory furnace each day.

The daily average level of oxygen enrichment percent calculated for the reverberatory furnace.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1401, 12-7-1990]

[Devices subject to this condition : D119]

K67.12 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Records from the regenerative thermal oxidizer temperature recording device(s).

The dates on which calibrations of the regenerative thermal oxidizer temperature recording device(s) are performed.

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

[Devices subject to this condition : C199, C205]

K67.13 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

The calendar dates on which calibrations of the triboelectric-type broken filter detector are performed.

A copy of the protocol from the manufacturer used to calibrate the triboelectric-type broken filter detector.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1407, 7-8-1994]

[Devices subject to this condition : C204]

K171.3 The operator shall provide to the District the following items:

The operator shall keep and maintain the following information and provide it upon request of District personnel.

1) The information required by condition E448.4 part 5.

2) The number of working hours per day involving lead removal.

3) The date and time of each HEPA filter replacement.

4) A copy of the manufacturer's certification of efficiency for the HEPA filter(s).

[RULE 1420, 9-11-1992]

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : C193, C194]

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

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A) Two (2) copies of the test plan shall be submitted to the 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 District before the tests commence. The plan shall include the proposed operating conditions of the equipment during each test run.

B) The test plan copies shall be submitted electronically in Adobe pdf file format on digital compact disc, or by email attachment, to the current permit processing engineer assigned to this facility at the time of the source test.

C) The total amount, in tons, of all materials charged to the rotary dryer furnace, the cupola furnace, the refining pot furnaces, and the RMPS battery crusher 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.

D) The 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).

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

E) Upon completion of the source tests, a final report shall be submitted to the District not later than 60 days after the source test is completed. The test report shall be submitted electronically in Adobe pdf file format on digital compact disc or by email attachment to the current permit processing engineer assigned to this facility at the time of the source test.

[RULE 1420.1, 3-7-2014]

[Devices subject to this condition : S142]

K171.6 The operator shall provide to the District the following items:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A) Two (2) copies of the test plan shall be submitted to the Refinery and Waste Management Permitting Unit, Engineering and Compliance, not less than 30 calendar days prior to the initial test date and shall be approved by the SCAQMD before the tests commence. The plan shall include the proposed operating conditions of the equipment during each test run.

B) The test plan copies shall be submitted electronically in Adobe pdf file format on digital compact disc, or by email attachment, to the current permit processing engineer assigned to this facility at the time of the source test.

C) The total amount, in tons, of all materials charged to the rotary dryer furnace, the cupola furnace, and the refining pot furnaces 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. Exide shall also include the special data reports required in the source testing condition for this equipment.

D) The test plan shall be submitted for SCAQMD 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 SCAQMD 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.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

8. Date(s) and time(s) of commencement of the test(s).

E) Upon completion of the source tests, a final report shall be submitted to the SCAQMD not later than 30 days after the source test is completed. The test report shall be submitted electronically in Adobe pdf file format on digital compact disc or by email attachment to the current permit processing engineer assigned to this facility at the time of the source test.

[RULE 1402, 3-4-2005]

[Devices subject to this condition : D128, S139, S145, C199]

K171.7 The operator shall provide to the District the following items:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A) Two (2) copies of the test plan shall be submitted to the Energy/Public Services/Waste Management/Terminals Permitting Unit, Engineering and Compliance, not less than 60 calendar days prior to the initial test date and shall be approved by the SCAQMD 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 cupola furnace 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 SCAQMD 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 SCAQMD 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).

D) The source tests shall be completed, and a final report submitted to the SCAQMD, not later than 180 days of initial startup of the new HEPA filter dust collectors. Exide shall notify the SCAQMD of the initial startup of the new equipment not later than 24 hours after the new equipment is fully operational.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; **40CFR 63
Subpart X, 6-23-2003**]

[Devices subject to this condition : C46, C48, S140, S142, S158, C192, C196, C200,
C201]

K171.8 The operator shall provide to the District the following items:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A) Two (2) copies of the test plan shall be submitted to the 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 SCAQMD 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 battery crusher 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 SCAQMD 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 SCAQMD 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).

D) The source tests shall be completed, and a final report submitted to the SCAQMD, not later than 180 days of initial startup of the new scrubber and HEPA filter enclosure. Exide shall notify the SCAQMD of the initial startup of the new equipment not later than 24 hours after the new equipment is fully operational.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; **40CFR 63 Subpart X, 6-23-2003**]

[Devices subject to this condition : C165, S166, C172]

K171.9 The operator shall provide to the District the following items:

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

A) Two (2) copies of the test plan shall be submitted to the Energy/Public Services/Waste Management/Terminals Permitting Unit, Engineering and Compliance, not less than 60 calendar days prior to the initial test date and shall be approved by the SCAQMD 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 reverberatory furnace 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 SCAQMD 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 SCAQMD 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).

D) The source tests shall be completed, and a final report submitted to the SCAQMD, not later than 180 days of initial startup of the new HEPA filter dust collectors. Exide shall notify the SCAQMD of the initial startup of the new equipment not later than 24 hours after the new equipment is fully operational.

FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[RULE 1407, 7-8-1994; RULE 1420, 9-11-1992; RULE 1420.1, 3-7-2014; **40CFR 63
Subpart X, 6-23-2003**]

[Devices subject to this condition : C47, S141, C195]

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 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
374185	1407
466858	3003
481923	1420
530090	1420.1
560680	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.

South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

March 25, 2011

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

Reference: Application No. 374185:

Approval of the Rule 1407 Compliance Plan for Facility ID # 124838

Dear Mr. Copeland:

The South Coast Air Quality Management District (AQMD) has completed the review of the above referenced application for your Rule 1407 compliance plan for the above-described facility. The compliance plan to meet the requirements of Rule 1407 is granted approval subject to the following conditions:

- 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) This facility shall be operated in accordance with the requirements specified in subparts (d)(1), (d)(3), (d)(5), (e), and (g)(1) of Rule 1407.
- 4) The rotary dryer furnace, reverberatory furnace, and blast furnace baghouses shall be operated pursuant to all requirements stated in this plan letter, with the exception of the temperature requirement of Rule 1407 (d)(3).
- 5) All baghouses at this facility shall be operated in compliance with the applicable temperature limits stated in the Facility Permit.
- 6) The operator shall keep and maintain records to demonstrate compliance with these conditions, and with all of the monitoring, record keeping, and reporting requirements in Rule 1407. These records shall be maintained on site for a minimum of five years and shall be made available to SCAQMD personnel upon request.

It is your responsibility to comply with all other applicable AQMD Rules and Regulations and with all laws, ordinances, and regulations of other government agencies which are applicable to the operation of the equipment.

Please ensure that a copy of this letter is kept with the permit to facilitate compliance determination. Should you have any questions regarding this plan approval, please contact Marco A. Polo at (909) 396-2633.

Very truly yours,



Jay Chen, P.E.
Senior Engineering Manager
Refinery and Waste Management Permitting

JC:TL:MAP

cc: File
Compliance

Exide64.doc



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

January 16, 2009

Ed Mopas
Environmental Manager
Exide Technologies (I.D. 124838)
2700 South Indiana Street
Los Angeles, CA 90023

Dear Mr. Mopas:

**Revised Conditional Approval of Fenceline Monitor Locations Pursuant to the
Rule 1420 Compliance Plan Issued Under Application No. 481923**

Subsequent to the issuance of the conditional approval of fenceline monitor locations on December 12, 2008, the South Coast Air Quality Management District (AQMD) received your letter dated December 23, 2008, requesting time extensions for installing monitor #3 at an offsite location and for all monitors to be equipped with backup power. After carefully evaluating your requests, we have decided to approve your time extension requests with some modifications as shown in the revised conditions below. As discussed in a telephone conversation on December 18, 2008, this approval of monitor locations does not include the location of an additional offsite monitor, which will be decided at a later date when EPA's requirements for siting the monitors under the new NAAQS for lead are more clearly understood.

The revised conditions that Exide is required to comply with in addition to all other applicable conditions are as follows:

- 1) Exide shall install and maintain new and/or relocated lead monitors at the locations, as indicated in Condition No. 2 below, and shall maintain, conduct and report sampling results using these monitors as required by Condition No. 22 and Condition No. 23 of Exide's Rule 1420 Compliance Plan (A/N 481923) and pursuant to Rule 1420(g), except when otherwise specified below.
- 2) Exide shall locate and operate the ambient lead monitoring stations according to the following specifications:
 - A. For the purpose of this condition, the perimeter fencelines of the Exide facility shall be defined according to the nomenclature described in the diagram

located in Attachment 'A' which is incorporated into this approval letter, and according to the definitions in the following table:

Facility Corner	ID	UTM East (Km)	UTM North (Km)	Geodetic (WGS 84) Longitude	Geodetic (WGS 84) Latitude
North East	NE	389.849	3763.585	-118.19285	34.00710
North	N	389.726	3763.637	-118.19419	34.00756
Middle	MID	389.662	3763.484	-118.19486	34.00617
North West	NW	389.490	3763.548	-118.19673	34.00673
South West	SW	389.448	3763.454	-118.19717	34.00588
South	S	389.745	3763.329	-118.19394	34.00478
Admin South East	SE	389.818	3763.299	-118.19315	34.00452

- B. Exide shall maintain and operate ambient lead monitoring stations at location numbers 1, 2, 4 and 5, as indicated in the following table:

Ambient Lead Monitor	ID	Fenceline ID	Reference Corner	Distance Along Fenceline From Reference Corner (Meters)
1	NE	NE-N	NE	0 + 5
2	N	NE-N	N	22 + 10
3	MID	N-MID	MID	85 + 10
4	SW	SW-S	SW	16 + 10
5	SE	ADMIN BLDG	SE	0 + 10

- C. Exide shall maintain and operate a monitoring station at a location immediately adjacent to the west bank of the flood channel and perpendicular to monitor location number 3 indicated in the above table. On or before March 17, 2009, Exide shall provide a written enforceable contract with the property owner allowing Exide to install and operate a monitoring station at this location and for District personnel to have access to the station without restriction.
- D. Sampling at all monitoring stations shall begin as scheduled below (from 12:00 midnight of the dates listed through 12:00 midnight of the same date) and continue to sample on days in accordance with the U.S.E.P.A. 1-in-3 day sampling schedule (<http://www.epa.gov/ttn/amtic/calendar.html>):

<u>Monitor Number</u>	<u>Sampling Start Date</u>
1	January 19, 2009
2	January 19, 2009
3	March 17, 2009
4	January 19, 2009
5	January 19, 2009

- 3) Exide shall not perform wet wash down of any outdoor surfaces within a 10 meter radius of an installed ambient air monitoring station on days during which the air monitor is collecting an ambient air sample. This condition does not preclude the wash down of these surfaces on days in which the monitor is not in operation. This condition must be met in addition to all other conditions specifying wet wash down and/or housekeeping requirements in the Rule 1420 plan issued for this facility.
- 4) On or after March 17, 2009, each ambient air lead monitoring station shall be equipped with an uninterruptible backup power supply capable of maintaining the monitoring system in full, continuous operation for a minimum of three (3) hours during electrical power interruptions, including voluntary, emergency, anticipated and/or unanticipated losses of electrical power. In the event that compliance with this condition cannot be maintained after installation of the backup power supply, Exide shall, within one hour of power interruption, contact the AQMD by calling 1-800-CUT-SMOG under the menu option of "breakdown."
- 5) Pursuant to Rule 1420(i) and Title V requirements, Exide 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 pursuant to Rule 1420(g). Additionally, the operator shall report to the AQMD the results of all ambient air lead and wind monitoring pursuant to Rule 1420(j).
 - D. The records shall be retained for a period of five years, and shall be made available to the AQMD upon request.

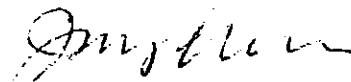
It is your responsibility to comply with all other applicable Rule 1420 requirements including but not limited to all conditions in Exide's Rule 1420 Compliance Plan that was approved on May 7, 2008 under Application No. 481923, all other applicable AQMD Rules and Regulations, and with all laws, ordinances, and regulations of other government agencies which are applicable to the operation of the equipment.

Please replace the conditional approval letter dated December 12, 2008, with this letter and ensure that a copy of this letter is kept on site with your facility permit to facilitate

January 16, 2009

your compliance determination. Should you have any questions regarding this conditional approval, please contact Thomas Liebel at (909) 396-2554.

Very truly yours,



Jay Chen, P.E.
Senior Engineering Manager
Refinery and Waste Management Permitting

JC:TL:MAP

cc: File
Ed Pupka
Philip Fine
Teresa Barrera

ATTACHMENT A



1 inch = 65 meters

EXIDE TECHNOLOGIES, VERNON, CALIFORNIA - ONSITE AMBIENT LEAD MONITOR SITING



South Coast Air Quality Management District



21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

May 7, 2008

Mr. Jack London
Exide Technologies
2700 South Indiana Street:
Los Angeles, CA 90023

Reference: Application No. 481923:

Approval of the Rule 1420 Compliance Plan for Facility ID # 124838

Dear Mr. London:

The South Coast Air Quality Management District (AQMD) has completed review of all information relating to your compliance plan submitted pursuant to Rule 1420 – Emissions Standard for Lead, for the above-described facility. This plan letter supersedes the plan letter previously issued under Application No. 374177. This amended Rule 1420 Compliance Plan is granted approval subject to the following conditions:

1. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall take steps to cleanup all fugitive lead-dust pursuant to AQMD Rule 1420(c)(5) – Emissions Standard for Lead, Definitions, Fugitive Lead Dust Emissions, where the dust forming materials at the emission source has a lead content of 0.5 percent by weight or more as determined by EPA-approved methods. Areas where cleanup activities shall occur include but are not limited to:
 - Plant roadways including all vehicular and foot traffic areas
 - Plant adjacent public sidewalks and roadways
 - Raw Materials Preparation Storage Area (Battery Breaker Area)
 - Reverberatory Furnace Feed Room
 - Materials Storage and Handling Areas
 - Furnace Areas Including:
 - a. Reverberatory Furnace Area
 - b. Blast (Cupola) Furnace Area
 - c. Refining Pots/Kettles and Casting Area
 - All building rooftops as identified in Attachment No. 1

- Storage pile areas and any other areas (including those that are directly open to atmosphere or those that are only partially enclosed) where lead or lead-containing wastes that are generated from housekeeping activities is stored, disposed of, recovered or recycled. This condition does not include lead-containing wastes that are in fully enclosed buildings that are maintained under negative pressure as described in Condition No. 16.

Cleanup activities of these and other areas shall be completed no later than sixty (60) days from the date of receipt of the approved Rule 1420 Compliance Plan amendment. This condition does not include lead-containing wastes that are in fully enclosed buildings that are maintained under negative pressure as described in Condition No. 16.

2. Not later than thirty (30) days after receipt of their approved amended Rule 1420 Compliance Plan, Exide shall survey all facility structures that house, contain or control any and all lead emission points or fugitive lead-dust emissions and shall permanently repair such facility structures to ensure the structural integrity of these buildings/structures (including roofs) such that there are no gaps, breaks, separations, leak points or other possible routes for emissions of lead or lead-dust to outside ambient air. In the event that a specific repair cannot be concluded in the time period specified, Exide shall immediately notify the Executive Officer for approval, the specific repair and the approximate date that the repair will be concluded.
3. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, in the event that repair and/or demolition activities are undertaken to remedy those structural deficiencies identified in Condition No. 2, or for any other reason, Exide Technologies shall ensure that for the material being demolished or repaired, that the affected adjacent areas be cleaned and dust free or otherwise be adequately wetted down to suppress generation of any fugitive lead-dust emissions.
4. Not later than fifteen (15) days after receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall permanently remove the weather cap from the Neptune Scrubber (SOx Scrubber; Device C43) serving the reverberatory furnace (Device D119).
5. Not later than thirty (30) days after receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall file applications for Permit(s) to Construct to install in the South Torit Baghouse (Device ID C39) HEPA-type filter cartridges with a minimum efficiency guaranteed by the manufacturer of 99.97 percent on 0.3 micron size particles.
6. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall transport all materials capable of

generating any amount of fugitive lead-dust emissions at the facility within closed conveyor systems or in closed containers. When transporting any materials capable of generating any amount of fugitive lead-dust emissions via forklift or any other mobile transportation method in open alleys or any other open or partially open areas of the Exide facility, the materials capable of generating any amount of fugitive lead-dust emissions shall be transported in closed containers and in such a manner as to prevent fugitive lead emissions from being released into the ambient atmosphere. This condition shall not apply to lead-bearing materials handled or transported within totally enclosed buildings that are maintained under negative pressure as described in Condition No. 16.

7. Not later than forty five (45) days after receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall maintain on site a mobile sweeper. The mobile sweeper shall be a sweeper that is PM₁₀-compliant pursuant to AQMD Rule 1186.
8. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, Exide shall, using the mobile sweeper specified in Condition No. 7, routinely sweep three times every calendar day, Sunday through Saturday. Each routine sweeping event shall occur at least once per operating shift and each sweeping event shall be not less than four (4) hours apart. Each routine sweeping event shall include the sweeping of all concrete, asphalted areas, and plant roadways of the Exide Technologies property, as well as facility adjacent sidewalks. Exide shall meet with the proper authorities in the City of Vernon to discuss the possibilities of sweeping city roadways, including but not limited to portions of 26th Street and Indiana Street. The AQMD shall be notified 3 working days in advance of these meetings. In addition, Exide shall, in addition to the three routine sweeping events specified above, sweep as necessary any areas of concrete, asphalted areas, and plant roadways of the Exide Technologies property where accidents, mishaps and/or process upsets result in deposition of lead bearing material and/or dust. Exide Technologies shall not be required to comply with this condition on rainy days for both routine and non-routine sweeping events. The mobile street sweeper shall be maintained and operated in accordance with all manufacturer specifications. Any mechanical malfunctions of the sweeper that either precludes or prevents its operation shall be immediately reported to the AQMD at 1.800.CUT.SMOG and reported as a breakdown pursuant to AQMD Rule 430 - Breakdown Provisions. If the sweeper is not repaired within 3 calendar days of a reported breakdown, the Executive Officer shall be notified and an alternate sweeper meeting the operating criteria and capabilities in Condition No. 7 shall be placed on site and shall be immediately operated by Exide Technologies or a selected contractor. Records shall be kept of the mobile sweeping activities to demonstrate compliance with this condition including all dates and times of operation, areas where sweeping has occurred, all maintenance and repairs performed on the sweeper, and the name and signature of the responsible person carrying out the particular activity. Such records shall be kept in a format approved by the Executive Officer or designee and made

available upon request. The breakdown reporting provisions of this condition shall apply only to the sweeper as noted and shall not require the shutdown of any other equipment(s).

9. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, the interior and exterior areas and surfaces of the Raw Materials Preparation Storage Area (Battery Breaker Area) shall be completely and entirely washed down with water each shift that the hammer mill (Device D1) is operated, with each cleaning being not less than four (4) hours apart. All liquids and runoff from the washing down of exterior areas and surfaces shall be discharged into Exide Technologies' storm water retention pond. Alternatively, in lieu of washing down the exterior areas and surfaces with water, the exterior areas and surfaces may be cleaned using either a certified sweeper pursuant to Condition No. 7 or an AQMD permitted HEPA vacuum having a minimum efficiency guaranteed by the manufacturer of 99.97 percent on 0.3 micron size particles.
10. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, dust suppression practices, including but not limited to the use of water or other AQMD approved chemical dust suppressants as specified in AQMD's Rule 403 Handbook, shall be applied in all areas where fugitive lead-dust emissions potential exists resulting from any maintenance or operations activity. In the event that dust suppression practices pose a safety risk to affected employees due to the nature of the maintenance or operations activity (e.g. electrical work, arc welding, etc.), the dust suppression practices may be suspended until such time that the safety risk (electrical work, arc welding, etc.) has been completed or removed, and once removed, the dust suppression practices shall be immediately implemented.
11. Not later than thirty (30) days after receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall, on a monthly basis, clean the entire roof tops of the smelting refining building, blast furnace feed building, and finished lead warehouse building and on a semiannual basis clean the roof tops of the RMPS and reverb feed buildings. Exide Technologies shall clean the roof tops in sections or all at once by washing with water or spot vacuuming them using an AQMD permitted HEPA-type vacuum with a minimum efficiency guaranteed by the manufacturer of 99.97 percent on 0.3 micron size particles. Exide shall keep a record of the dates and times of the cleanings. After six (6) months of such roof cleanings, Exide may file a Rule 1420 Plan amendment application to request that the Executive Officer change the frequency of the roof cleanings.
12. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, throughout each operating day, as appropriate and necessary to prevent fugitive lead dust emissions, Exide Technologies shall spot clean all traffic areas where any visible dust has accumulated including any visible dust

that has accumulated outside of all office areas. The spot cleaning shall be accomplished using a wet mopping technique or by using an AQMD permitted HEPA-type vacuum with a minimum efficiency guaranteed by the manufacturer of 99.97 percent on 0.3 micron size particles.

13. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, at least one time each operating day, Exide Technologies shall inspect, and as necessary, empty and clean out all drums containing Personal Protective Equipment (PPE) and dispose of all contaminated PPE as hazardous waste.
14. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, all materials capable of generating any amount of fugitive lead-dust emissions shall be stored inside an enclosure or, if stored outside, shall be sufficiently covered with plastic or a tarp to prevent lead-bearing dust from entering ambient air.
15. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, those Exide Technologies staff responsible for compliance with Rule 1420 - Emissions Standard for Lead, housekeeping requirements, shall receive training in all Rule 1420 housekeeping provisions and requirements before commencing with any Rule 1420 housekeeping duties, and future training shall be conducted yearly thereafter. Any new employees that will be responsible for carrying out any Rule 1420 housekeeping activities shall be trained within 60 days of date of hire and before participating in any housekeeping activities. Training records, including staff names of trainees, shall be retained for 5 years on site in a format approved by the Executive Officer or designee and made available upon request.
16. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, process fugitive lead-dust emissions generated at Exide Technologies from the smelter/refining building and the blast furnace feed room shall only be generated within a total enclosure subject to general ventilation that maintains the enclosure at a lower than ambient pressure to ensure in-draft through any and all doorways, windows, passages or openings of the enclosure. Process fugitive lead-dust emissions generated from the reverb furnace feed room shall be contained within a partial enclosure and shall be subject to the requirements of 40 CFR 63.545(c)(5).
17. Not later than thirty (30) days after receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall install at each leeward wall(s) of each of the total enclosures identified in Condition No. 16 (smelter/refining building and the blast furnace feed room), a differential pressure gauge to measure on an ongoing basis, the pressure difference between the inside and outside of the enclosure. The gauge shall be certified by the manufacturer to be capable of

measuring the pressure differential in the range of 0.02 to 0.2 millimeters of mercury (Hg).

18. Not later than seven (7) days after installation of the differential pressure gauges described in Condition No. 17, which shall include testing and 'debugging', Exide Technologies shall demonstrate to the satisfaction of the Executive Officer or designee that the inside of each total enclosure, as described in Condition Nos. 16 and 17, is maintained at a negative pressure as compared to the outside of the enclosure by ensuring that the differential pressure measured by each of the gauges installed pursuant to Condition No. 17 is no less than 0.02 millimeters of mercury (Hg) when all of the enclosure doorways and openings are in the position they are in during normal operations. The pressure reading of each gauge at each wall shall be recorded three times every calendar day, Sunday through Saturday. Each pressure reading recording event shall occur at least once per operating shift and each recording event shall not be less than four (4) hours apart. The record shall be in a format approved by the Executive Officer or designee and made available upon request. After six (6) months of recording the differential pressures, Exide may file a Rule 1420 Plan amendment application to request that the Executive Officer change the frequency of the recording of the differential pressures.
19. In the event the 0.02 millimeter mercury pressure standard in Condition No. 18 is violated, Exide Technologies shall, within one hour of discovery of the violation, contact the AQMD at 1.800.CUT.SMOG and report the situation as a breakdown pursuant to Rule 430 - Breakdown Provisions, and take immediate steps to remedy the situation. The breakdown reporting provisions of this condition shall apply only to the pressure differential gauge as noted and shall not require the shutdown of any other equipment(s).
20. Not later than thirty (30) days after receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall use a propeller anemometer to demonstrate that there is in-draft at all doorways and openings of each of the total enclosures described in Condition No. 16. The propeller anemometer shall either be permanently installed at each doorway or opening or a hand held propeller anemometer shall be used. The demonstration shall occur at each doorway and opening of each enclosure at least once per operating shift and each demonstration shall not be less than four (4) hours apart and shall demonstrate that in-draft occurs across the entire doorway or opening. The anemometer shall be calibrated in accordance with manufacturer's recommendations and records of in-draft demonstrations shall be kept in a format approved by the Executive Officer or designee and made available upon request. After six (6) months of anemometer in-draft demonstrations, Exide may file a Rule 1420 Compliance Plan amendment application to request that the Executive Officer change the frequency of the anemometer in-draft demonstrations or that the in-draft demonstrations no longer be required.

21. Not later than fifteen (15) days after receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall, pursuant to Rule 1420 (g), submit to the AQMD for review and approval the appropriate air dispersion modeling protocol for establishing three (3) to four (4), as determined appropriate by AQMD, on-site fence line ambient lead monitors, and at least two (2) off-site ambient lead monitors in accordance with the requirements of 40 CFR Parts 50, 53 and 58. "Not later than sixty (60) days after AQMD's approval of the dispersion modeling protocol, Exide Technologies shall complete the dispersion modeling, establish the location of the on-site fence line ambient lead monitors and off-site ambient lead monitors, and submit a report containing this information to AQMD for approval. After placement of the on-site fence line and off-site monitors and after six months of data collection, Exide may file a Rule 1420 Compliance Plan amendment to reduce the number of ambient lead monitors.
22. Not later than 30 (thirty) days after the AQMD approval of the proposed locations of the fence line ambient lead monitors and the off-site ambient lead monitors in Condition No. 21, Exide Technologies shall install the monitors at those approved locations and immediately commence collecting and reporting lead sampling data from the ambient lead monitors in the manner prescribed in Rule 1420(g). The sampling data shall include the continuous recording of wind speed and wind direction during sampling periods pursuant to Rule 1420(g)(6). In the event that there is a malfunction or breakdown of any of the six ambient lead monitors or the equipment used to record wind speed and direction, Exide Technologies shall, within four hours of when the operator knew or reasonably should have known of a malfunction or breakdown, contact the AQMD at 1.800.CUT.SMOG and report the situation as a breakdown pursuant to Rule 430 - Breakdown Provisions, and take immediate steps to remedy the situation. The breakdown reporting provisions of this condition shall apply only to the ambient lead monitors and off-site monitors as noted and shall not require the shutdown of any other equipment(s).
23. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall, within three (3) business days of the sampling devices collecting any 24-hour sample(s) at any of the six monitors, obtain the laboratory results reflecting the ambient lead concentrations of the collected sample(s). In the event that any of the results of any of the daily collected samples exceeds the established allowable federal ambient lead concentration, Exide shall notify the Executive officer within four hours and immediately conduct an investigation of the exceedance. The investigation shall identify all potential sources/causes of the exceedance(s) including process abnormalities, housekeeping breaches, or any other such source or cause. Exide Technologies shall maintain a record of the date and time of the exceedance(s), the results of the investigations, and the steps taken to ensure the reported exceedance(s) does not reoccur. Records shall be in a format approved by the Executive Officer or designee and made available upon request. After six (6)

months of obtaining results in three business days, Exide may file a Rule 1420 Compliance Plan amendment application to request that the Executive Officer change the three (3) business day time frame for obtaining laboratory results.

24. Not later than thirty (30) days after receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall update The Standard Operating Procedures (SOP), NESHAP Compliance Plan for Fugitive Sources, previously submitted by GNB Technologies Inc., in July 1997, to reflect current Exide Technologies, Inc., ownership status and modified to reflect all applicable operating practices now required by this Rule 1420 Compliance Plan.
25. Not later than fifteen (15) days after receipt of their approved amended Rule 1420 Compliance Plan, Exide Technologies shall retain the services of an Environmental Manager whose responsibility shall be to assure ongoing and sustained compliance with the terms and conditions of this agreement, and all applicable AQMD Rules and Regulations including: Rule 201, Permit to Construct, Rule 203 - Permit to Operate, Rule 401 - Visible Emissions, Rule 402 - Public Nuisance, Rule 403 - Visible Emissions, Rule 1158 - Storage, Handling, and Transport of Coke, Coal and Sulfur, Rule 1420 - Emissions Standard for Lead, and all relevant and applicable state and federal standards including but not limited to State of California Air Toxics Control Measure for Lead, National Ambient Air Quality Standards for Lead, National Emissions Standards for Hazardous Air Pollutants, 40CFR Part 63, Subpart X and federal Title V, Section J provisions and requirements. The Environmental Manager shall be empowered with decision making authority to expeditiously employ sufficient mitigation measures to gain facility compliance in the event of equipment breakdown or failure, fugitive lead-dust emissions, insufficient housekeeping, or any other situation that either causes or will cause non-compliance with any of the aforementioned conditions, rules or regulations. Records of all actions performed by the Environmental Manager including the date and time of incident occurrence, full written explanation of the nature and extent of the incident and both short- and long-term corrective action taken to remedy the situation. Records shall be kept in a format approved by the Executive Officer or designee and made available upon request.
26. Effective immediately upon receipt of their approved amended Rule 1420 Compliance Plan, where not elsewhere specified in these conditions, Exide shall keep, in a format approved by the Executive Officer or his designee, records to demonstrate compliance with all conditions of this Rule 1420 Compliance Plan. Each record shall include dates and times of activities required by the conditions of this Plan, and shall include the name and signature of the responsible person keeping the records. The records shall be kept for a minimum of five years and shall be made available to AQMD personnel upon request.

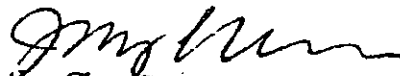
May 7, 2008

27. The AQMD may at any time amend this plan to incorporate and impose additional conditions, including but not limited to sampling and monitoring requirements, for the purpose of achieving compliance with all applicable federal, state, and AQMD rules and regulations. Failure to comply with all conditions, terms, and agreements contained in this Rule 1420 Compliance Plan could result in additional enforcement action.

It is your responsibility to fully comply with all other applicable Rule 1420 requirements, all other applicable AQMD Rules and Regulations and with all laws, ordinances, and regulations of other government agencies which are applicable to the operation of the equipment.

This plan shall be incorporated into the written Standard Operating Plan (SOP) required by 40 CFR 63 Subpart X. Please ensure that a copy of this letter is kept on site with your facility permit to facilitate compliance determination. Should you have any questions regarding this plan approval, please contact Thomas Liebel at (909) 396-2554.

Very truly yours,



Jay Chen, P.E.
Senior Engineering Manager
Refinery and Waste Management Permitting

JC:TL

cc: Edwin L. Pupka, Compliance
File

May 7, 2008 - FINAL

South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

January 27, 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.

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

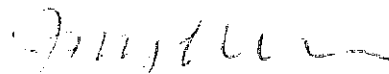
Permits to Construct, where applicable, prior to the commencement of construction of such enclosure(s) listed in part D of this condition.

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

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

RECEIVED

JAN 20 2012

JAY CHEN
SR. MANAGER



Compliance Plan
SCAQMD Rule 1420.1

Prepared for:
Exide Technologies
Vernon, California

Prepared by:
ENVIRON International Corporation
Irvine and Los Angeles, California

Date:
January 2012

Project Number:
07-26544A

Contents

	Page
1 Executive Summary	1
1.1 Rule Required Measures	1
1.2 Compliance Plan Early Action Measures	2
1.3 Compliance Plan Contingent and Future Measures	4
2 Introduction	5
2.1 Facility Location	5
2.2 Process Description	5
2.3 Rule 1420.1 Requirements	5
2.4 Ambient Air Quality Monitoring Results	Error! Bookmark not defined.
3 Rule 1420.1 Required Measures	7
3.1 Total Enclosures Required by Rule 1420.1	7
3.2 Lead Point Source Emission Controls Required by Rule 1420.1	7
3.2.1 Lead Point Sources Vented to Emission Controls [Rule 1420.1(f)(1)]	8
3.2.2 Facility-Wide Emission Limits [Rule 1420.1(f)(2)]	9
3.2.3 Installation of Secondary Controls on Dryer [Rule 1420.1(f)(3)]	9
3.2.4 Installation of Secondary HEPA Controls [Rule 1420.1(f)(4)]	10
3.2.5 Installation of PTFE Filter Bags [Rule 1420.1(f)(5)]	10
3.2.6 Summary: Impact of Exide's Rule-Required Measures	10
4 Ambient Air Quality Modeling	11
5 Additional Compliance Plan Lead Emission Reduction Measures	13
5.1 Compliance Plan Early Action Measures	13
5.1.1 "Baghouse Row" Permit Application and Installation	14
5.1.2 Additional Voluntary Fugitive Source Control Compliance Plan Early Action Measures Completed by June 2011	14
5.2 Compliance Plan Contingent and Future Measures	16
5.2.1 Additional Compliance Plan Contingent Measures to Achieve the Ambient Lead Concentration	16
5.2.2 Additional Compliance Plan Contingent Measures Housekeeping, Inspection, and Maintenance [Rule 1420.1(g)(2)(A)(i)]	16
5.2.3 Additional Compliance Plan Total Enclosure Measures [Rule 1420.1(g)(2)(A)(ii)]	17
5.2.4 Modifications to Lead Control Devices [Rule 1420.1(g)(2)(A)(iii)]	17
5.2.5 Installation of Multi-Stage Lead Control Devices [Rule 1420.1(g)(2)(A)(iv)]	17
5.2.5a Negotiated Potential Contingent and Future Measures	17
5.2.6 Process Changes, including Reduced Throughput Limits [Rule 1420.1(g)(2)(A)(v)]	17
5.2.7 Conditional Curtailments [Rule 1420.1(g)(2)(A)(vi)]	18
5.3 Implementation Schedule for All Additional Compliance Plan Lead Emission Reduction Measures (Early Action Measures and Contingent Measures)	211
6 Conclusion	222

Contents (Continued)

List of Tables

Table 1.	Total Enclosures at Exide	7
Table 2.	Currently Permitted Control Equipment at Exide	8
Table 3.	Current Facility-wide Pb Emission Rates	9
Table 5.	Source Parameters of AERMOD Runs	11
Table 6.	Lead Concentrations at the Monitors Predicted by AERMOD ($\mu\text{g}/\text{m}^3$)	11
Table 7.	Additional Early Pb Emission Reduction Measures	15
Table 7a	Additional Pending Pb Emission Reduction Measures	16
Table 8.	Additional Pb Compliance Plan Contingent Measures	16

List of Figures

Figure 1.	Site Vicinity Map
Figure 2.	Site Plot Plan
Figure 3.	Nearest Residential Receptors
Figure 4a.	Charge: Reverb + Blast v. On-site N
Figure 4b.	Charge: Reverb + Blast v. Concentration MID
Figure 4c.	Charge: Reverb + Blast v. Concentration NE
Figure 4d.	Charge: Reverb + Blast v. Concentration Rehrig
Figure 4e.	Production: Reverb + Blast v. Concentration On-site N
Figure 4f.	Production: Reverb + Blast v. Concentration MID
Figure 4g.	Production: Reverb + Blast v. Concentration NE
Figure 4h.	Production: Reverb + Blast v. Concentration Rehrig
Figure 5.	Average Lead Concentration at On-Site N Monitor versus Production

List of Appendices

Appendix A.	List of Compliance Plan Measures
Appendix B.	December 1, 2011 Letter from the SCAQMD
Appendix C.	Conditions

P:\E\Exide\1420.1-Compliance Plan-2011\CompPlan\Exide 1420-1 Compliance Plan.docx

1 Executive Summary

Exide Technologies, Inc.'s (Exide) Rule 1420.1(g) Compliance Plan describes additional lead emission reduction and control measures to assure compliance with the National Ambient Air Quality Standard of $0.15 \mu\text{g}/\text{m}^3$ on a three-month rolling average and Rule 1420.1(d)(2) averaged over 30 consecutive days after January 1, 2012, if Exide does not demonstrate compliance with those standards.

Exide submitted its initial Compliance Plan in August 2011. On December 15, 2011, Exide submitted a revised Compliance Plan in order address the South Coast Air Quality Management District's December 1, 2011 correspondence (correspondence attached hereto as Appendix B). Exide and the District thereafter engaged in further communication regarding measures to be implemented, and Exide now submits this second revised Compliance Plan at the District's request. Exide has worked in good faith with the District throughout this process.

Exide has diligently undertaken lead emission reduction measures that fall into two general categories: (a) measures required by South Coast Air Quality Management District Rule 1420.1 ("Rule-Required Measures"), and (b) Rule 1420.1(g) Compliance Plan additional lead emission reduction Measures ("Rule Compliance Plan Additional Lead Emission Reduction Measures").

The Rule Compliance Plan Additional Lead Emission Reduction Measures can be further divided into two sub-categories: (i) additional lead emission reduction measures that Exide has already proactively implemented ("Compliance Plan Early Action Measures" or "Early Action Measures"), and (ii) additional lead emission reduction measures that Exide will implement if it does not satisfy the ambient standards beginning with and after January 2012 ("Compliance Plan Contingent Measures" or "Contingent Measures").

Though many of these Rule-Required Measures and Compliance Plan Early Action Measures are complete (and have greatly reduced ambient air lead concentrations), several have only recently been implemented or are still in progress. Therefore, the full emissions-reduction impact of these measures is yet to come, and Exide is reasonably assured that it will comply with the ambient standards after January 1, 2012. Indeed, Exide is satisfying emissions standards as of the date of this January 2012 Compliance Plan submittal. If Exide does not satisfy the NAAQS standard in the future, Exide is prepared to implement the additional Compliance Plan Contingent measures to achieve compliance.

1.1 Rule Required Measures

Exide has worked diligently to implement all measures required by Rule 1420.1. These Rule-Required Measures include:

- Exide has completed construction of total enclosures of the battery breaking areas, the materials and storage and handling areas, the dryer and dryer areas, the smelting furnaces and furnace areas, the agglomerating furnace, and the refining and casting areas. [Rule 1420.1(e)]
- Exide has completed work to vent its lead point sources, such as the reverb and blast furnace and lead refining kettles, to baghouses and other air pollution emissions controls. [Rule 1420.1(f)(1)]

- Exide has succeeded in reducing total facility mass lead emissions from all lead point sources to below 0.045 pounds of lead per hour. [Rule 1420.1(f)(2)]
- Exide has installed secondary emissions controls (a HEPA after-filter) on its existing rotary kiln dryer to reduce point source lead emissions. [Rule 1420.1(f)(3)]
- Exide has installed secondary HEPA after-filters between the North and South Torit baghouses outlet and the existing fan inlet. [Rule 1420.1(f)(4)]
- Exide has installed PTFE filter bags in the MAC baghouse. [Rule 1420.1(f)(5)].

These completed Rule-Required Measures have allowed Exide to significantly reduce ambient air concentrations to levels approaching the NAAQS standard. Because certain of the Rule-Required Measures have only just been completed, the full positive impact of these measures has yet to appear in Exide's ambient monitoring results.

1.2 Compliance Plan Early Action Measures

In addition to 1420.1 Rule-Required Measures, Exide has voluntarily implemented several additional Compliance Plan Early Action Measures designed to achieve the NAAQS. Exide voluntarily undertook these Compliance Plan Early Action Measures (not all of which are complete, with the full positive impact still to come) in an abundance of caution even before it submitted the initial Compliance Plan in August 2011. Exide has diligently continued to work on these Compliance Plan Early Action Measures throughout 2011 and 2012, even as the Compliance Plan was being reviewed by the District. In other words, many of these Compliance Plan Early Action Measures have or already are being implemented proactively as "additional lead emission reduction measures" under Rule 1420.1(g).

These additional Compliance Plan Early Action Measures include:

- Exide has obtained the necessary permits and approvals to fully enclose its "Baghouse Row" (an area of nine baghouses between the furnace and feed prep building) which will be ventilated so as to provide the necessary in-draft velocity and negative pressure for the new enclosure. The design of this enclosure has been completed and the construction air permit received. Construction of the enclosure has commenced and is well underway. The enclosure, which is a major capital project designed to significantly reduce point-source emissions, was initially expected to be complete by the end of 2011. However, due to unexpected delays in material delivery (i.e. steel for the enclosure), Exide now expects to complete the enclosure by March 31, 2012. Exide's air modeling demonstrates that the Baghouse Row enclosure will succeed in achieving the NAAQS.
- Exide has already diligently and voluntarily undertaken and/or implemented the following Compliance Plan Early Action Measures as proactive "additional lead emissions reduction measures":
 - 1) Installed doors between the shipping and smelting building areas to enhance negative pressure in the smelting building.
 - 2) Installed an automated door on the Southeast end of the feed corridor connecting the reverb and blast feed rooms to reduce the amount of time that door is open.
 - 3) Installed a new vehicle wheel wash station in the west yard of the plant.

- 4) Completely resurfaced the west yard of the facility to enhance the effectiveness of pavement cleaning activities.
- 5) Installed MERV 15 rated cartridge filters in the North and South Torit collectors
- 6) Upgrading Dry Sweepers to a combination hybrid dry sweeper / wet scrubbing ride-on pavement cleaning unit for use on plant yard paved areas to enhance pavement cleaning efforts. [Completed by October 2011]. Placed an order for a second scrubber/sweeper in December 2011.
- 7) Install ventilated negative pressure enclosure for "Baghouse Row" [to be completed by March 2012]
- 8) Modifying the railcar dock at the south end of the smelting building to allow the direct receipt of industrial battery plates into the blast furnace feed room. [to be completed by March 31, 2012]
- 9) Replacing strip curtains with doors on north and south end of RMPS building. [completed by December 31, 2011]
- 10) Installing a new vehicle and equipment decontamination and wash area at the north end of Baghouse Row as part of the Baghouse Row enclosure construction. [completed by December 31, 2011]
- 11) Discontinued use of the mobile equipment wash area at the south end of the plant in December. Closure to be completed pending DTSC Permitted Unit closure requirements.
- 12) Focused housekeeping on roofs and other horizontal surfaces in Baghouse Row. [ongoing during 2011-2012] A second contractor has been added to perform this service and other cleaning services related to fugitive dust control efforts.

In addition to those measures already implemented or in progress, Exide has agreed to implement the following (either by its own suggestion or at the District's request):

- 13) Exide will be installing two backup diesel generators to supply sufficient electrical power to drive the exhaust fans for the two metallurgical furnace process off-gas baghouses and the two Torit collection systems in the event of a power outage. This will ensure that off-gases from the furnaces themselves continue to be drawn through fabric filtration during such outages. By continuing to drive the Torit fans suction can be maintained on the main smelting building enclosure during such upset events. Exide will submit any air permit applications necessary for installation of the diesel engines associated with these generators by May 2012. [voluntary work, to be completed by June 2012]
- 14) Exide will install a minimum of six (6) boot wash stations at the exits of the total containment buildings [as requested by District, to be completed by June 30, 2012]
- 15) Exide will designate one or more forklifts to be used exclusively inside of total containment buildings [as requested by District, to be completed by June 30, 2012]

Exide's diligent actions have already dramatically lowered ambient lead emission concentrations. By continuing its additional Compliance Plan Early Action Measures and completing the Baghouse Row enclosure, Exide reasonably expects to achieve and maintain the 0.15 $\mu\text{g}/\text{m}^3$ ambient lead standard.

1.3 Compliance Plan Contingent and Future Measures

Exide's diligent and aggressive voluntary Compliance Plan Early Action Measures are expected to reduce lead emissions to satisfy the NAAQS. Should it not achieve the NAAQS, Exide will be prepared to promptly implement additional compliance measures on a contingent basis to further reduce fugitive emissions. These measures include:

- Application of an elastomeric coating to the roof of the battery breaker building to enhance the maintainability of the roof and prevent the development of pinhole leaks over time.

Finally, pursuant to Rule 1420.1, Exide has considered other reduction options, including but not limited to whether process changes such as reduced throughput limits and conditional curtailments would assist in achieving NAAQS requirements. Exide has demonstrated that there is no relationship between throughput rates and ambient lead concentrations at its facility, such that reduced throughput (even on a conditional basis) would not be expected to further reduce emissions to achieve the NAAQS. [See Section 5.2.6, *infra*] Exide therefore does not believe it is appropriate to include throughput and conditional curtailments as self-implementing "additional lead emissions reductions measures" in this Compliance Plan. Nonetheless, Exide submitted a possible structure for conditional curtailments in its revised Compliance Plan (submitted December 2011), modeled to reflect the District Hearing Board's preference (stated in its 2008 order) for reasonable and proportional curtailments. Exide and the District have continued to discuss potential curtailment options in December and January, and Exide has now in good faith agreed to the curtailment structure reflected in this second revised Compliance Plan.

In summary, Exide has diligently completed Rule-Required Measures and has proactively and voluntarily undertaken other Compliance Plan Early Action Measures (some recently implemented, others not yet complete) designed to achieve the NAAQS and Rule 1420.1 (d)(2) ambient concentration limit after January 1, 2012. These actions have greatly reduced emissions (and Exide is currently in compliance with emissions standards), but their full effect is not yet known and will not be known until the end of April 2012. Exide has verified through air modeling that its completion of certain measures (especially full enclosures of all process areas) will result in ambient compliance. However, if Exide continues to exceed the ambient concentration limits in 2012, Exide is prepared to promptly implement additional Compliance Plan Contingent Measures to reduce emissions.

For ease of reference, a complete chart listing all Additional Compliance Plan Lead Emission Reduction Measures (both Early Action Measures and Contingent Measures) and their completion dates and implementation schedule can be found at Appendix A. Appendix A also includes graphics indicating the location of each activity. In addition, Appendix C sets forth the negotiated and District-approved conditions that Exide must satisfy.

2 Introduction

2.1 Facility Location

The Exide facility (SCAQMD ID # 124838) is located at 2700 South Indiana Street, Vernon, California. Exide is a secondary lead smelter that recycles lead batteries and other lead-bearing scrap materials. Figure 1 shows the facility and its vicinity. The land use in the immediate vicinity (up to 1.5 kilometers [km] radius) of the facility is industrial and the topography around the facility is primarily flat. The facility's layout showing the locations of the various buildings and the stacks are presented on Figure 2.

2.2 Process Description

Spent lead-acid batteries and other lead-bearing scrap materials are delivered to the facility by trucks, where the batteries and scraps are crushed, separated, and smelted to recover lead and propylene.

The spent lead-acid batteries and lead-bearing scrap are first broken apart and separated into the plastic, lead, and acid components. The plastic is recovered, and the acid is sent to a holding tank. The lead-containing components are transferred into one of the feed rooms, where they are then fed by conveyor to either the Reverberatory (Reverb) furnace (Device D119) or the Blast furnace (Device D128), which are each used to heat the lead until it reaches a molten state.

The lead refining kettles are used to purify the hot, molten lead that is produced during the smelting process. Each kettle sits inside a brick-lined pit, housing natural gas-fired burners. The burners heat the air between the burners and the kettle, thereby heating the kettle. The kettles are continuously heated; however, there are usually only two or three kettles that contain material at any one time. The molten lead in the kettles is repeatedly heated, agitated with a mixer, and allowed to cool, with periodic stirring and additions of refining agents.

The refined lead is then formed into ingots, which are subsequently transferred to the Finished Lead Storage Building.

2.3 Rule 1420.1 Requirements

On November 12, 2008, the United States EPA published the Final Rule in the Federal Register revising the NAAQS for lead from 1.5 $\mu\text{g}/\text{m}^3$ to 0.15 $\mu\text{g}/\text{m}^3$ measured on a three-month rolling average.

On November 5, 2010, the SCAQMD Governing Board adopted Rule 1420.1 (Emissions Standards for Lead from Large Lead-Acid Battery Recycling Facilities). Rule 1420.1(d)(2) prohibits a covered facility from discharging lead emissions exceeding 0.15 $\mu\text{g}/\text{m}^3$ averaged over any 30 consecutive days. The Rule requires covered facilities to implement certain practices and emission control measures to attain the Lead NAAQS standard with the 30-day period starting January 1, 2012.

Pursuant to Rule 1420.1(g), starting on July 1, 2011, if the facility discharges lead emissions that exceed 0.12 $\mu\text{g}/\text{m}^3$ averaged over any 30 consecutive days, the facility shall submit a

Compliance Plan that contains a description of additional lead emission reduction measures to achieve the ambient lead concentration of $0.15 \mu\text{g}/\text{m}^3$ averaged over any 30 consecutive days.

3 Rule 1420.1 Required Measures

Rule 1420.1 establishes several requirements intended to ensure compliance with the revised Lead ambient air quality standard of $0.15 \mu\text{g}/\text{m}^3$. Rule 1420.1(e) specifies the requirements for Total Enclosures. Rule 1420.1(f) specifies the requirements for Lead Point Source Emission Controls.

Exide has complied with the mandatory provisions of Rule 1420.1, as set forth below. This work has significantly reduced both fugitive and point source lead emissions to levels approaching the NAAQS.

3.1 Total Enclosures Required by Rule 1420.1

Rule 1420.1(e) requires that the following areas be enclosed within a total enclosure as defined by Rule 1420.1(c)(25):

- (A) Battery breaking areas;
- (B) Materials storage and handling areas, excluding areas where unbroken lead-acid batteries and finished lead products are stored;
- (C) Dryer and dryer areas including transition pieces, charging hoppers, chutes, and skip hoists conveying any lead-containing material;
- (D) Smelting furnaces and smelting furnace areas charging any lead-containing material;
- (E) Agglomerating furnaces and agglomerating furnace areas charging any lead-containing material; and
- (F) Refining and casting areas.

As of July 1, 2011 Exide has enclosed all required areas. Table 1 summarizes this work.

Table 1. Total Enclosures at Exide

Control Device Description	Equipment/Area Controlled
Total enclosure around RMPS area	Fugitive emissions in RMPS area
Total enclosure around dryer	Fugitive emissions from rotary dryer furnace (D115)
Total enclosure around smelting and refining processes	Fugitive emissions from smelting and refining processes
Total enclosure around South Corridor between Smelting and Refining building and Reverb Furnace Feed Room	Fugitive emissions in South Corridor
Partial enclosure/tunnel for truck washing station	Minimize lead-contaminated water from spraying outside truck washing station

3.2 Lead Point Source Emission Controls Required by Rule 1420.1

Rule 1420.1(f) requires that each lead control device meet certain requirements. Exide's compliance with these Rule requirements is summarized below.

3.2.1 Lead Point Sources Vented to Emission Controls [Rule 1420.1(f)(1)]

Exide currently employs multiple types of air pollution control (APC) equipment and other emission reduction measures in order to reduce the amount of process lead emissions. A list of the currently permitted, installed and fully operational control equipment (as of the date of this plan) is provided in Table 2.

Table 2. Currently Permitted Control Equipment at Exide

Control Device Description	Equipment/Area Controlled
Baghouses/Dust Collectors/Scrubbers	
C40 – baghouse; C41 – baghouse;	Reverb furnace (D119)
C44 – afterburner; C45 – baghouse	Blast furnace (D128)
C42 – venturi scrubber; C43 – tray scrubber; S139 – stack	APC 1 (C40, C41), APC 2 (C44, C45)
Hard Lead baghouse	Lead refining kettles and dross hoppers (D7 – D20), Blast furnace tapping ports and launders (D129 – D134), rotary dryer furnace enclosure (C177)
Soft Lead baghouse	Lead refining kettles and dross hoppers (D24 – D37), Reverb furnace feeders (D117, D118), Reverb furnace tapping ports and launders (D120 – D125), fugitive emissions from Quench Chamber cleanout door (D149)
Material Handling baghouse	Central Vacuum System A (C159, C160), Central Vacuum System B (C162, C163), Blast Furnace feed hopper (D126)
C165 – packed bed scrubber; C172 – HEPA filter; S166 – stack	Raw Material Preparation System (RMPS) building (C175), Hammermill (D1), Hammermill feed conveyor (D2), Mud holding tanks (D3 – D5)
North Torit baghouse	Fugitive emissions from the Smelting and Refining building, fugitive emissions from the pending Baghouse Row building
South Torit baghouse	Fugitive emissions from the Smelting and Refining building, fugitive emissions from the pending Baghouse Row building
C143 – cyclone; C144 – baghouse; S145 – stack	Rotary dryer furnace (D115) and screw conveyors (D114, D116)
C156, C157 – MAC baghouses; S158 - stack	RMPS building (C175), lead refining kettle burner stack emissions, rotary dryer hoppers (D109, D110) and conveyors (D111 – D113), South Corridor building (C182)
C159 – cyclone; C160 – baghouse	Fugitive emissions in Blast Furnace Feed Room
C162 – cyclone; C163 – baghouse	Fugitive emissions in Blast Furnace Feed Room

3.2.2 Facility-Wide Emission Limits [Rule 1420.1(f)(2)]

1420.1(f)(2) requires that the total facility mass lead emissions from all point sources shall not exceed 0.045 pounds of lead per hour, a level determined from District dispersion modeling at the time of promulgation of Rule 1420.1 as sufficient to maintain ambient concentration impacts from stack sources below one half the ambient limit. Exide has taken diligent actions to achieve (and even go substantially below) these limits.

As shown in Table 3, the facility-wide Pb emissions from all point sources at Exide are currently below the 0.045 lbs/hr limit.

Rule 1420.1(f)(2) also requires that no single source have lead emissions in excess of 0.01 lbs/hr. As shown in Table 3, all individual sources have a lead emission rate that is less than 0.01 lbs/hr and is in compliance with this section of the Rule.

Table 3. Current Facility-wide Pb Emission Rates

AQMD Device ID	Control Device Description	Area Served	Source Test Date	Source Test Measured (dscfm)	Pb Emissions (lbs/hr)
C38	North Torit	General Ventilation	9/2011	90,694	0.00374
C39	South Torit	General Ventilation	8/23/2011	97,118	0.00321
C156/C157	MAC BHs	GV: RMPS, Kettle Burners, Reverb Feed	8/1-9/1/2011	90,727	0.00339
C48	Material Handling BH	GV: Material Handling & Blast Feed Room	10/12/2010	95,858	0.00115
C165/C172	RMPS MAPCO Demister / HEPA	RMPS	11/10-12/2010	17,270	0.000358
C144/C143	Kiln Dryer BH / Cyclone	Kiln (Rotary Dryer)	9/2011	9,723	0.00202
C42/C43	Neptune-Venturi Scrubber	Blast & Reverb furnaces	9/8/2010	18,059	0.000175
C46	Hard Lead BH	Hard Lead	10/4,5,7/2010	101,832	0.00102
C47	Soft Lead BH	Soft Lead	10/2010	85,435	0.000851
Total				606,716	0.016
					<0.045 limit

3.2.3 Installation of Secondary Controls on Dryer [Rule 1420.1(f)(3)]

On 12/3/2010 Exide submitted a permit application (A/N 516866) to install a HEPA after-filter between the existing rotary kiln dryer baghouse (C144) outlet and the existing fan inlet. Exide completed the HEPA installation by June 30, 2011. Exide therefore reasonably expects that this unit will comply with the requirements of Rule 1420.1(d)(3)(A) and will further reduce the point source lead emissions from the facility in 2011-2012.

3.2.4 Installation of Secondary HEPA Controls [Rule 1420.1(f)(4)]

On 5/13/2011 Exide submitted a permit application (A/N 520575 & A/N 50577) to install a HEPA after-filter between the existing North and South Torit baghouses (C38 & C39) outlet and the existing fan inlet. Exide completed the duct work and HEPA installation on August 9, 2011. Exide completed a source test on this unit by the end of the month. As with the secondary controls on the dryer (Section 3.2.3 above), Exide reasonably expects that this recent addition will further reduce lead emissions in 2011-2012.

3.2.5 Installation of PTFE Filter Bags [Rule 1420.1(f)(5)]

Exide submitted Permit applications (A/N's 520478 & 520501) on 3/31/2011 to install upgraded polytetrafluoroethylene membrane-type (PTFE) filter bags on the MAC baghouses. Exide completed the upgrade and the baghouse leak tested in June 2011. Exide completed a source test on this unit in September 2011.

3.2.6 Summary: Impact of Exide's Rule-Required Measures

Exide's efforts to comply with the mandatory provisions of Rule 1420.1 have resulted in significant reductions of both fugitive and point source lead emissions, with stack emissions, for example, being reduced by approximately one half on a facility-wide basis since the promulgation of the Rule. Because Exide only recently completed several of the required measures, their full positive impact has yet to be fully realized. Thus, Exide expects to show even further emissions reductions and further improvement to ambient levels by the end of 2011 and early 2012 and is expected to demonstrate and maintain compliance once the Baghouse Enclosure is complete.

Exide's actions have significantly reduced ambient lead concentrations (see Table 4), and these reductions are expected to continue into the future. Exide reasonably expects that full compliance will be achieved once the Baghouse Row enclosure is complete.

Table 4. Ambient Air Monitoring Results (30-day Average)

Month	Rail	SE	SW	NE	OSN	MID
July 2011	0.06	0.06	0.08	0.68	0.55	0.21
August 2011	0.07	0.06	0.09	0.70	0.47	0.18
September 2011	0.03	0.06	0.08	0.23	0.25	0.14
October 2011	0.04	0.06	0.18	0.22	0.17	0.14
November 2011	0.03	0.08	0.16	0.18	0.19	0.26
December 2012	0.03	0.05	0.09	0.08	0.11	0.12
January 1-17, 2012	0.03	0.05	0.09	0.07	0.10	0.11

4 Ambient Air Quality Modeling

US EPA's AERMOD dispersion model was used to evaluate the impacts that the Pb reduction Rule-Required Measures and those Early Action Measures currently under construction would have on the ambient Pb concentrations measured at the monitors located at and around the fenceline of the Vernon facility. Inputs to AERMOD included:

- Pb emission rates (lbs/hr) from Point Sources using the rates measured from source tests conducted in late 2010 and early 2011 at the facility;
- Stack heights for the North Torit, South Torit, and MAC Baghouse were increased from 79 feet to 120 feet for and the building parameters reflect the presence of the new Baghouse Row enclosure; and
- Roadway fugitive emissions from the 2007 ATIR were included in this dispersion modeling. Emissions from all other fugitive sources were set to zero to reflect the effect of the pending construction of the "Baghouse Row" enclosure is completed.

Table 5. Source Parameters of AERMOD Runs

Source ID	UTM Coordinates (m)		Emission Rate (g/s)	Release Height (m)	Temp (K)	Velocity (m/s)	Stack Diameter (m)
	X	Y					
MAPCO	389705.7	3763538	8.05E-05	19.35	299.48	4.55	1.09
MAT_STOR	389722.7	3763488	1.18E-03	34.14	300.93	14.14	2.13
SOFTLEAD	389750.0	3763554	8.38E-04	34.14	318.15	14.10	2.03
HARDLEAD	389729.9	3763505	8.35E-04	34.14	311.76	17.17	2.03
DRYER_BH	389769.8	3763525	1.32E-03	36.60	375.22	7.47	0.91
NEPTUNE	389751.4	3763527	2.20E-05	34.14	332.89	8.27	1.16
NOR_CART	389790.5	3763550	3.60E-04	36.60	298.50	11.29	2.13
SOU_CART	389789.3	3763547	5.29E-04	36.60	298.89	15.29	2.13
MAC_BH	389740.1	3763479	2.36E-04	36.60	307.44	18.06	1.82
			0.0054	g/s			
			0.043	lbs/hr			

The modeling results are summarized in Table 6 below.

Table 6. Lead Concentrations at the Monitors Predicted by AERMOD ($\mu\text{g}/\text{m}^3$)

SW_Monitor	SE_Monitor	NE_Monitor	On-Site N	REHRIG	Railway	CP_Monitor
0.00765	0.00338	0.0437	0.02403	0.04657	0.01339	0.0071

For these modeling runs, the emission rates were based on source tests from late 2010 through early 2011. Additional source testing has been in progress as part of the update for the AB2588 HRA. The emission rates that were used in this modeling did not reflect the improvements due to the recent modifications to the air pollution control equipment. The total facility-wide emission rate for all stationary sources used in the modeling was 0.043 lbs/hr. This is greater than the 0.016 lbs/hr facility-wide rate when the most recent source tests are taken into account, but it is still less than the 0.045 lbs/hr limit set by the rule – indicating that the 0.045 lbs/hr facility-wide point source limit established in the Rule is adequate to insure compliance with the ambient standards.

Thus, the modeling results presented in this Plan reflect a worst case scenario when the Vernon plant is emitting lead at a rate just below the Rule limit. As the actual facility-wide emission rate is even less than the modeled rate, the ambient impacts would be less than what is reported here. Figure 3 shows the location of the nearest residential receptors, with the nearest receptor over 0.5 miles from the Vernon fence line.

The modeling results show that once all enclosures have been constructed and fugitive emissions become insignificant; the ambient Pb concentrations at the monitors will be well below the limit of $0.15 \mu\text{g}/\text{m}^3$ established by the Rule. In particular, the above results show that stack emission impacts are well below the $0.15 \mu\text{g}/\text{m}^3$ target concentration. Should the measures already planned and underway for completion by the end of 2011 fail to achieve the $0.15 \mu\text{g}/\text{m}^3$ lead concentration at the monitors on a 30-day average after January 1, 2012, this modeling makes it clear that the issue is not with impacts from stack emissions, but rather fugitive emissions. Any contingent measures (including curtailments) implemented in response to exceedances after January 1, 2012 should, therefore, be directed to fugitive sources.

5 Additional Compliance Plan Lead Emission Reduction Measures

Rule 1420.1(g)(2) requires that the Compliance Plan include the following elements:

- (A) A description of additional lead emission reduction measures to achieve the ambient lead concentration including, but not limited to, requirements for the following:
 - (i) Housekeeping, inspection, and maintenance activities;
 - (ii) Additional total enclosures;
 - (iii) Modifications to lead control devices;
 - (iv) Installation of multi-stage lead control devices;
 - (v) Process changes including reduced throughput limits; and
 - (vi) Conditional curtailments including, at a minimum, information specifying the curtailed processes, process amounts, and length of curtailment.
- (B) The locations within the facility and method(s) of implementation for each lead reduction measure of subparagraph (g)(2)(A); and
- (C) An implementation schedule for each lead emission reduction measure of subparagraph (g)(2)(A) to be implemented if lead emissions discharged from the facility contribute to ambient air concentrations of lead that exceed $0.15 \mu\text{g}/\text{m}^3$ averaged over any 30 consecutive days measured at any monitor pursuant to subdivision (j) or at any District-installed monitor. The schedule shall also include a list of the lead reduction measures of subparagraph (g)(2)(A) that can be implemented immediately prior to plan approval.

As previously explained Exide has undertaken various Compliance Plan Early Action Measures (Section 5.1, *et. seq.*) and also proposes Compliance Plan Contingent Measures (Section 5.2, *et. seq.*) to be implemented if Exide has not satisfied the NAAQS beginning in January 2012. A complete list of all Exide's Compliance Plan Lead Emission Reduction Measures is set forth at Appendix A.

5.1 Compliance Plan Early Action Measures

In addition to the control measures required by Rule 1420.1, Exide has proactively undertaken certain additional Compliance Plan Measures that will reduce fugitive lead emissions, which are the primary source of measured concentrations. Exide diligently undertook these measures in an abundance of caution before it formally submitted this Compliance Plan. Exide's Early Action Measures are, in effect, pre-qualified and self-implemented "additional lead emission reduction measures" under Rule 1420.1(g).

Exide has not completed all of these measures, and implementation of others began recently. Exide has therefore not yet realized the full emissions-reducing impact of these voluntary measures. Thus, the exceedance of the $0.12 \mu\text{g}/\text{m}^3$ level triggering this Compliance Plan does not reflect the expected lower lead concentrations to be achieved in 2012. Exide reasonably expects that continued implementation of these Compliance Plan Early Action Measures will

result in compliance with the ambient standards upon completion of the baghouse enclosure, making implementation of any additional Compliance Plan Contingent Measures unnecessary.

5.1.1 "Baghouse Row" Permit Application and Installation

On March 31, 2011, Exide submitted several permit applications (A/Ns 520468, 520577, 520575, 520501, 520478, 520477, & 522622) to enclose the area at the facility known as "Baghouse Row". Exide operates 9 baghouses in this area, which is between the smelting furnace building and feed prep building. Construction permits have been issued as a result of these applications, design completed, and construction of the enclosure has commenced. The enclosure was previously scheduled to be completed before the end of 2011.

Due to unanticipated material supply delays outside Exide's control, the Baghouse enclosure will not be complete until March 31, 2012. Exide will work diligently to ensure completion by this date or sooner if possible.

Exide has established an additional budget of \$250K to fund 30 hours/week of additional OT for the next 15 weeks (from December 10, 2011 through March 31, 2012) to accelerate the completion of the Baghouse Row Enclosure and mitigate any risk from weather delays.

The nine baghouses are represented in Exide's Title V permit as devices C40 and C41 (Reverb Furnace baghouses), C45 (Blast Furnace baghouse), C46 (Hard Lead baghouse), C47 (Soft Lead baghouse), C48 (Material Handling baghouse), C144 (Rotary Dryer baghouse), and C156 and C157 (MAC baghouses). These baghouses control emissions from various parts of Exide's processes, such as the raw material handling, refining, and smelting processes.

The area where the baghouses are located is currently open to the atmosphere. Exide is planning on building an enclosure around the baghouses in order to reduce fugitive lead emissions. The air inside the enclosure will be vented to existing air pollution control devices which consists of Torit cartridge collectors C38 and C39, respectively. The existing ventilation capacity is expected to be adequate to provide the necessary in-draft velocity and negative pressure for the new enclosure.

The height of the new enclosure will be 79 feet. In order to conform to current building codes, the height of the stacks for C144 (Rotary Dryer), C156 and C157 (MAC Baghouses), C38 (North Torit), and C39 (South Torit) must be increased to 120 feet, which will minimize the effects of building downwash while still meeting stack height rule limits. Exide will also install a differential pressure monitoring system on the new enclosure in compliance with Rule 1420.1. Overall, the voluntary modification to enclose "Baghouse Row" is expected to significantly reduce emissions. Indeed, Section 4 outlined Exide's ambient air modeling, demonstrating that ambient lead concentrations at all monitors will be less than $0.15 \mu\text{g}/\text{m}^3$ once all enclosures are fully-operational.

5.1.2 Additional Voluntary Fugitive Source Control Compliance Plan Early Action Measures Completed by June 2011

Exide undertook additional Compliance Plan Early Action Measures to reduce fugitive emissions from other locations at the Vernon plant, as summarized in Table 7 below. These measures were underway by July 2011 and will all be completed prior to January 1, 2012 (with the

exception of the Baghouse Row enclosure and related actions). As previously stated, these are "additional lead emissions reductions measures" under Rule 1420.1(g) that Exide has proactively and voluntarily initiated on an early action basis before submitting this formal Compliance Plan.

Table 7. Additional Early Pb Emission Reduction Measures

	Action	Completion Date
1	Install door(s) between shipping and smelting to enhances negative pressure in refining/smelting and reduce draft from shipping.	Oct 2010
2	Install an automated door on the southeast end of the corridor to reduce the amount of time that the door is open	Nov 2010
3	Install a new vehicle wheel wash station in the west yard of the plant	Jun 2011
4	Completely resurface the west yard of the facility to enhance the effectiveness of pavement cleaning activities	Jul 2011
5	Installed MERV 15 rated cartridge filters in the North and South Torit collectors	July 2011
6	Upgraded ride-on yard sweeper to a combination dry sweeper / wet scrubbing unit for cleaning of plant yard pavement. Added additional sweeper/scrubber.	Oct-Dec. 2011
7	Install ventilated negative pressure enclosure for "Baghouse Row"	March/April, 2012
8	Modify railcar dock at the south end of the smelting building to allow receiving of industrial plates and dedicated inside and outside forklifts.	Dec 2011
9	Replace strip curtains with doors at north and south end of RMPS building	Dec 2011
10	Install new vehicle and equipment decontamination and wash area at the north end of baghouse row as part of the baghouse row enclosure construction	Dec 2011
11	Discontinued use of mobile equipment wash area at south of plant. Final closure pending DTSC approval.	pending DTSC approval
12	Focused housekeeping and other horizontal surfaces in Baghouse Row, pending completion of enclosure of area. Secured services of second contractor	Nov 2010- Dec 2011

Certain of the measures were only recently implemented, and their positive effect on emissions is expected to increase as Exide continues to improve its procedures (*i.e.* improved housekeeping on roofs and horizontal surfaces). With these voluntary fugitive reduction Compliance Plan Early Action Measures, along with the required Rule-Required Measures and the pending "Baghouse Row" enclosure, Exide has seen emission reductions during the second half of 2011 and expects further reductions upon completion of these pending measures.

In addition to the items listed in Table 7, Exide has agreed to implement the following items in the near future, either of its own volition or as part of discussions with the District that took place after Exide submitted its revised Compliance Plan on December 15, 2011:

Table 7a Additional Pending Pb Emission Reduction Measures

Action	Completion Date
13. [Voluntary Measure] Exide will be installing two backup diesel generators to supply sufficient electrical power to drive the exhaust fans for the two metallurgical furnace process offgas baghouses and the two Torit collection systems in the event of a power outage. This will ensure that off-gases from the furnaces themselves continue to be drawn through fabric filtration during such outages and by continuing to drive the Torit fans suction can be maintained on the main smelting building enclosure during such upset events. Exide will submit the air permit applications necessary for the installation of the diesel engines associated with these generators by May 2012 and expects to complete installation of these systems by June 2012.	Jun 2012
14. [District-Required Measure] Exide will install a minimum of six (6) boot wash stations at the exits of the total containment buildings.	Jun 2012
15. [District-Required Measure] Exide will designate one or more forklifts to be used exclusively inside of total containment buildings. This Measure relates to and expands upon Measure No. 8 in Table 7.	Jun 2012

5.2 Compliance Plan Contingent and Future Measures

Exide reasonably believes that various measures already completed or underway will allow it to achieve the NAAQS and Rule 1420.1(d)(2) ambient limit. However, if Exide continues to exceed these standards after January 2012, it will undertake further additional "lead reduction measures" (Compliance Plan Contingent Measures) as set forth in this Section.

5.2.1 Additional Compliance Plan Contingent Measures to Achieve the Ambient Lead Concentration

Additional lead emission reduction Compliance Plan Contingent Measures evaluated and proposed to achieve the ambient lead concentration as required by Rule 1420.1(g)(2)(A) are described below.

5.2.2 Additional Compliance Plan Contingent Measures Housekeeping, Inspection, and Maintenance [Rule 1420.1(g)(2)(A)(i)]

In addition to continuing and increasing those already-implemented measures set forth in Table 7, if Exide has not satisfied the ambient standards it will perform the additional maintenance activities actions summarized in Table 8 below.

Table 8. Additional Pb Compliance Plan Contingent Measures

	Action	Completion Date	Emission Source
1	Apply elastomeric coating to the roof and sidewalls of the battery breaker building to enhance maintainability of the roof and prevent development of pinhole leaks over time.	June 2012	Fugitive

5.2.3 Additional Compliance Plan Total Enclosure Measures [Rule 1420.1(g)(2)(A)(ii)]

Once Exide installs the total enclosure for "Baghouse Row" as described in Section 5.1.1, all lead point sources at the Vernon plant will be operating inside total enclosures that will be vented to existing lead control devices.

In addition, a significant portion of the plant property will also be contained within total enclosures. Any fugitive dust generated on these operating areas will be contained and vented to existing lead control devices.

As a result, Exide does not envision that any additional total enclosures (beyond that already described for the enclosure of "Baghouse Row") will be available to be enclosed that would reduce Pb emissions.

5.2.4 Modifications to Lead Control Devices [Rule 1420.1(g)(2)(A)(iii)]

5.2.5 Installation of Multi-Stage Lead Control Devices [Rule 1420.1(g)(2)(A)(iv)]

The secondary HEPA filters were not yet installed on the North and South Torits by July 1, 2011 so their emission reduction benefits were not being fully felt at the ambient monitors when the original Compliance Plan was submitted. The installation was completed by the end of July with subsequent source tests being performed approximately one month later.

Section 4 outlined the ambient modeling Exide performed demonstrating that ambient Pb concentrations at all monitors will be less than $0.15 \mu\text{g}/\text{m}^3$ once all enclosures are fully operational. As a result, installation of additional multi-stage lead control devices will not be needed to meet the ambient Pb concentration.

5.2.5a Negotiated Potential Contingent and Future Measures

Though Exide maintains that such measures may not be necessary or appropriate (as set forth in sections 5.2.3 – 5.2.5), after discussion with the District, Exide has nonetheless agreed to certain potential contingent measures that may be implemented in the event of a future exceedance. These potential contingent future measures are governed by Conditions 8-11 in Appendix C.

5.2.6 Process Changes, including Reduced Throughput Limits [Rule 1420.1(g)(2)(A)(v)]

Upon careful consideration, Exide has not identified any issues with its basic processes or lead processing equipment and technologies that are hindering achieving the ambient standard. Fundamental process changes are not, therefore, proposed as Contingent Measures. However, as highlighted elsewhere in this Plan, Exide has proposed additional enclosures of those processes and equipment which Exide has modeled to be effective in achieving the NAAQS. With these enclosures (as well as Exide's other required and voluntary actions under 1420.1), Exide does not expect throughput limits to be necessary.

In order to assess whether process changes or throughput reductions may be necessary or effective, Exide plotted the daily ambient air measurements since 2010 from the specified monitors against the corresponding throughput rates for that day (Figure 4). For this exercise,

throughput is taken as the sum of the reverberatory furnace and blast furnace charging rates. Figure 5 is a bar chart that shows the average daily ambient air measurement for different ranges of daily production rates (tons/day).

All graphs clearly show that, for the plant configurations that existed during the time period represented by these charts, there is no correlation between throughput rate and the measurements taken from the various ambient monitors. At relatively low production rates (< 200 tons/day), the average reading from the indicated monitors is essentially the same as the readings at higher production rates (> 200 tons/day).

As Exide has demonstrated in the past, baghouses and other mechanical filtration devices are constant outlet concentration devices, not constant control efficiency devices. Their emission rates are determined by the concentration of contaminants bleeding through the filtration media which, once the filter media is "loaded" on the inlet side, remains relatively constant and independent of variations of inlet concentrations to the collector. Thus, emissions from such collectors also do not vary with the underlying process rates giving rise to those inlet concentration loadings. Therefore, if the ventilation fan serving a given baghouse is on, emissions are relatively constant and independent of process rates.

Given the demonstrated lack of any relationship between throughput rates and ambient monitor results at this facility, and the underlying principles of operation of the lead emission control devices at this facility, we believe that reduced throughput limits will not reduce lead concentrations at ambient monitors and are not an appropriate element for inclusion as a Compliance Plan measure.

Nonetheless, in its December 2011 revised Compliance Plan Exide suggested an approach that would have reduced throughput limits on a conditional basis. Exide has since negotiated certain conditional curtailments with the District, which are set forth in Section 5.2.7.

5.2.7 Conditional Curtailments [Rule 1420.1(g)(2)(A)(vi)]

As stated in Section 3.1 and elsewhere in this Plan, once Exide completes the installation of the total enclosures, emissions from fugitive sources are not expected to be a major contributor to lead concentrations.

Installation of upgrades at the point sources will ensure compliance with the emission limit established by Rule 1420.1(f)(2). As was stated in Section 3.2.2, the facility-wide Pb emission rate from all point sources from the most recent source tests is much less than the 0.045 lbs/hr limit established by the rule.

Reductions in process throughput will not reduce the lead concentration measured at ambient monitors as was described in section 5.2.6.

Reduction in emissions will be accomplished through the significant reduction in fugitive emissions, the installation of total enclosures and upgrades to the point sources. For the same reasons that "reduced throughput limits" are not an appropriate measure for reducing ambient impacts from this facility, neither are "conditional curtailments" involving processing or

production rates or activities. Exide has demonstrated repeatedly using actual data from this facility that ambient monitor concentrations have no relationship to process throughput rates.

As stated above in Section 4, dispersion modeling indicates that stack emissions would not be the cause should 30-day ambient concentrations exceed $0.15 \mu\text{g}/\text{m}^3$ after completion of the Baghouse Row enclosure. Accordingly, should any activities at the site be conditionally curtailed in response to such an occurrence, the curtailed activities should only be those associated with the potential generation of fugitive emissions rather than process activities that are enclosed and ventilated to point sources.

However, Exide recognizes that the District has requested additional process/throughput curtailment options. Therefore, in order to address the issues raised in the District's December 1, 2011 correspondence, and in the spirit of good faith cooperation with the District, Exide proposed a structure for conditional curtailments in its December 2011 revised Compliance Plan, to be implemented in the event that ambient concentrations exceed the $0.15 \mu\text{g}/\text{m}^3$ standard measured over 30 consecutive days. Exide continues to maintain that, if implemented, a curtailment structure must be reasonable and proportional, must conform to the Hearing Board's 2008 Order (3151-18) and other Hearing Board precedent, and must allow Exide a reasonable due process opportunity to identify and correct episodic causes for potential ambient exceedances without submitting to curtailment.

After its December 2011 submittal, Exide and the District continued to engage in discussions regarding conditional curtailments. In the spirit of good faith, Exide has agreed to implement the following (set forth in Appendix C):

1. 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 $0.15 \mu\text{g}/\text{m}^3$.

2. 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 $0.15 \mu\text{g}/\text{m}^3$.
3. 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.
4. Exide may avoid the mandatory curtailments set forth in Conditions 1 through 3 by seeking a waiver from the Executive Officer. Such request for waiver must be supported by substantial and credible evidence that Exide is not the cause of the exceedance or that Exide has definitely identified and corrected the cause of the exceedance. The foregoing shall not prevent Exide from seeking relief from these requirements upon application to the Hearing Board.

5.3 Implementation Schedule for All Additional Compliance Plan Lead Emission Reduction Measures (Early Action Measures and Contingent Measures)

For ease of reference, a complete chart listing all Additional Compliance Plan Lead Emission Reduction Measures (both Early Action Measures and Contingent Measures) and their completion dates and implementation schedule can be found at Appendix A. Appendix A also includes graphics indicating the location of each activity. In addition, Appendix C sets forth the negotiated and District-approved conditions that Exide must satisfy.

6 Conclusion

The Plan described herein demonstrates that the combination of measures already undertaken (both Rule Required and voluntary Compliance Plan Early Action Measures) at the Exide Vernon facility and measures for which applications have already been submitted will be sufficient to assure future compliance with the ambient standard of $0.15 \mu\text{g}/\text{m}^3$ established in Rule 1420.1. The primary elements of the Plan are the installation of secondary filtration on selected sources (the kiln dryer baghouse and the Torit cartridge collectors) and, most significantly, the construction of an additional large enclosure to house the facility's baghouse operational area. Completion of the pending enclosure will occur by the end of March 2012. Dispersion modeling indicates that with the completion of these projects, Exide will comply with the ambient standards (both federal and Rule 1420.1). If Exide continues to exceed the NAAQS in 2012, Exide is prepared to promptly implement additional voluntary Contingent Measures to reduce emissions.

Figures

Figure 4a - Charge: Reverb + Blast v. On-site N

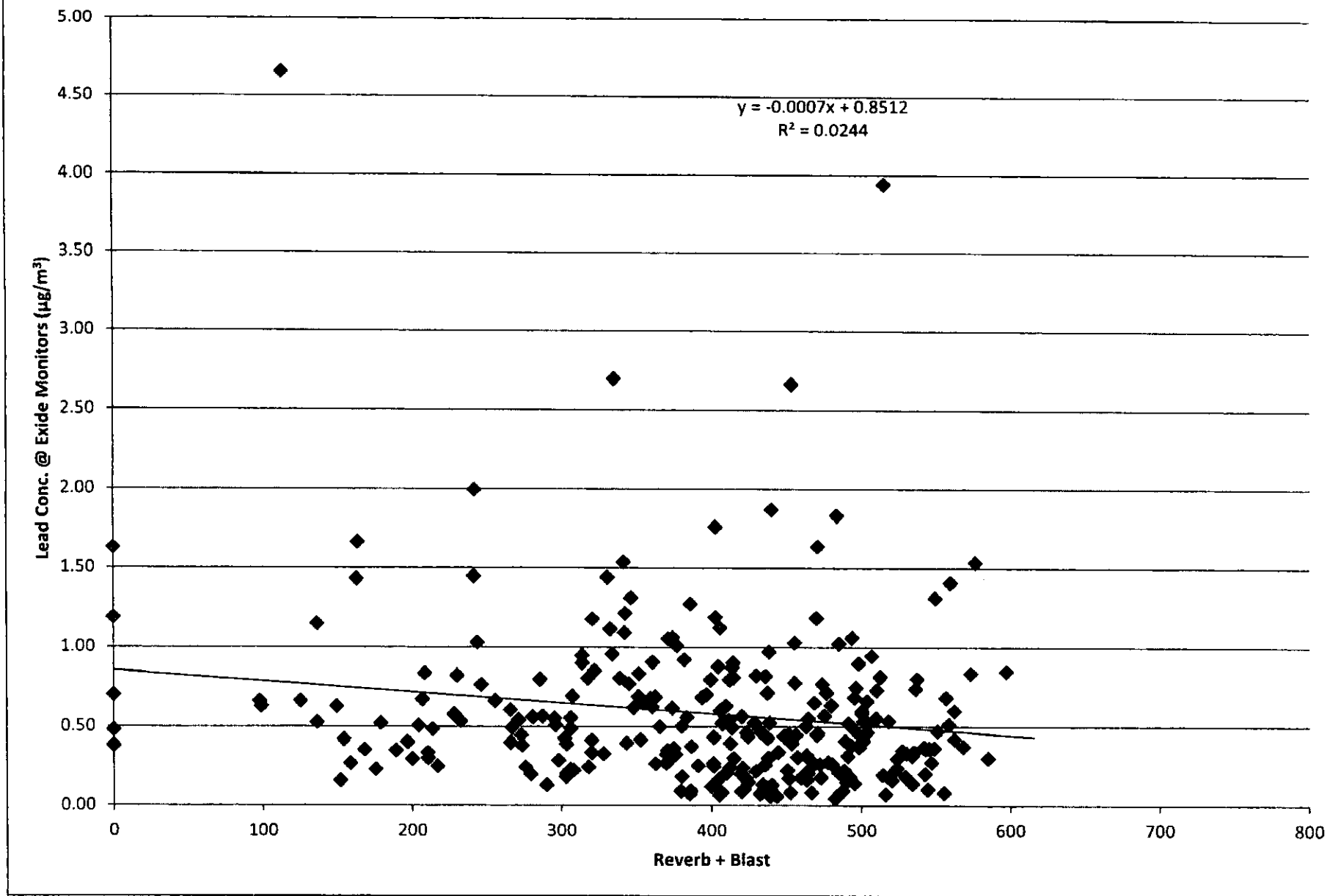


Figure 4b - Charge: Reverb + Blast v. Concentration MID

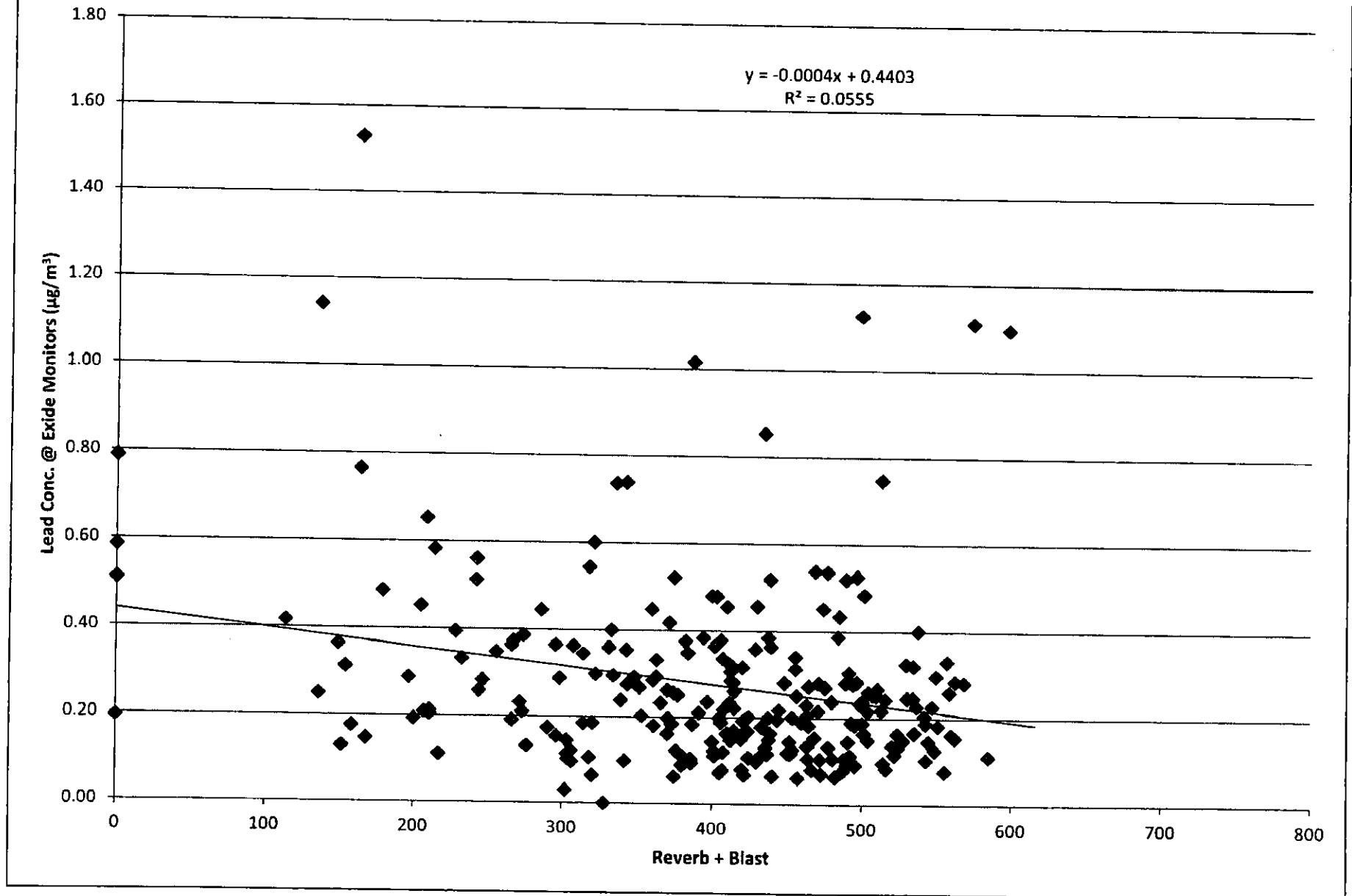


Figure 4c - Charge: Reverb + Blast v. Concentration NE

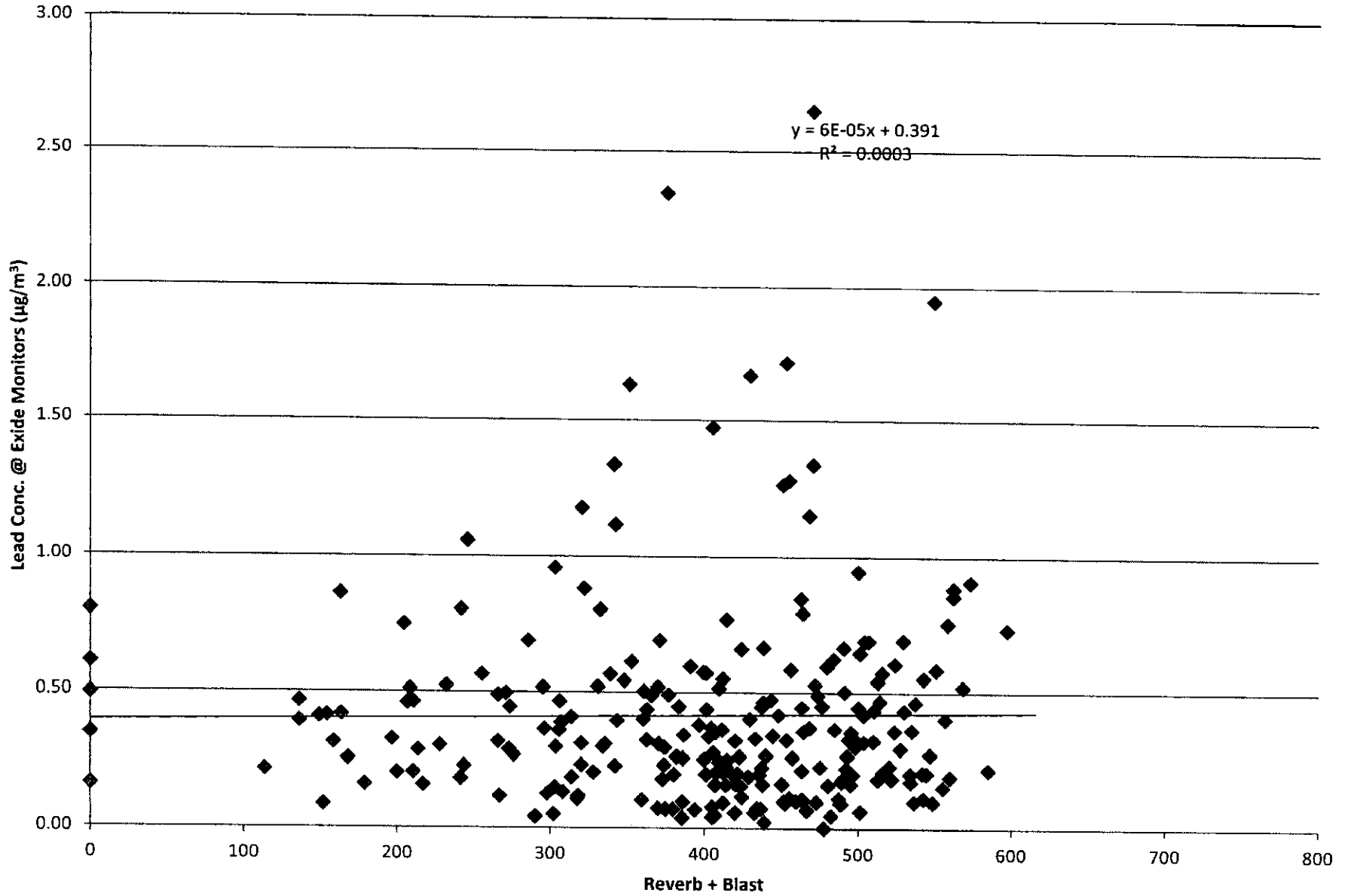


Figure 4d - Charge: Reverb + Blast v. Concentration Rehrig

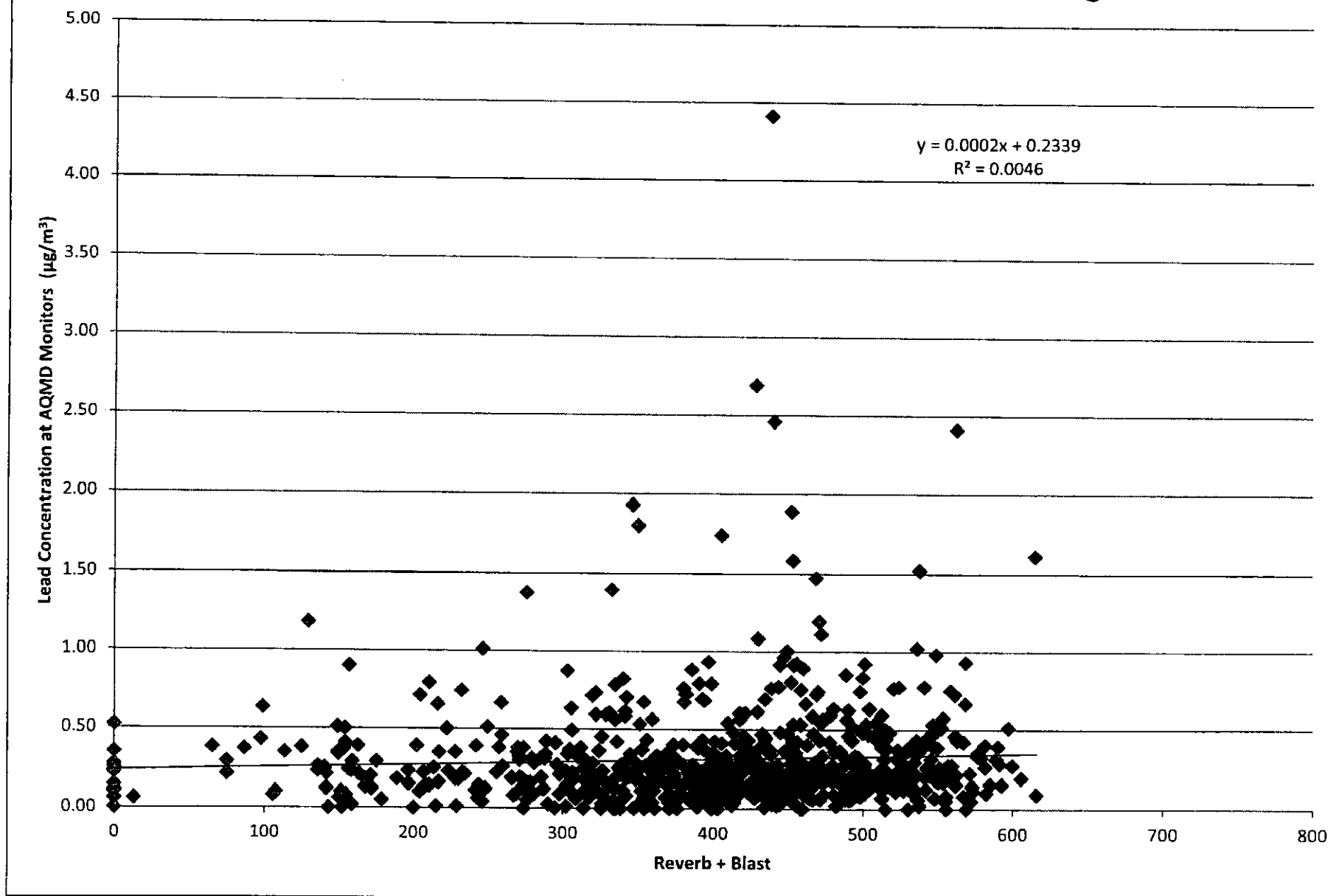


Figure 4e - Production: Reverb + Blast v. Concentration On-site N

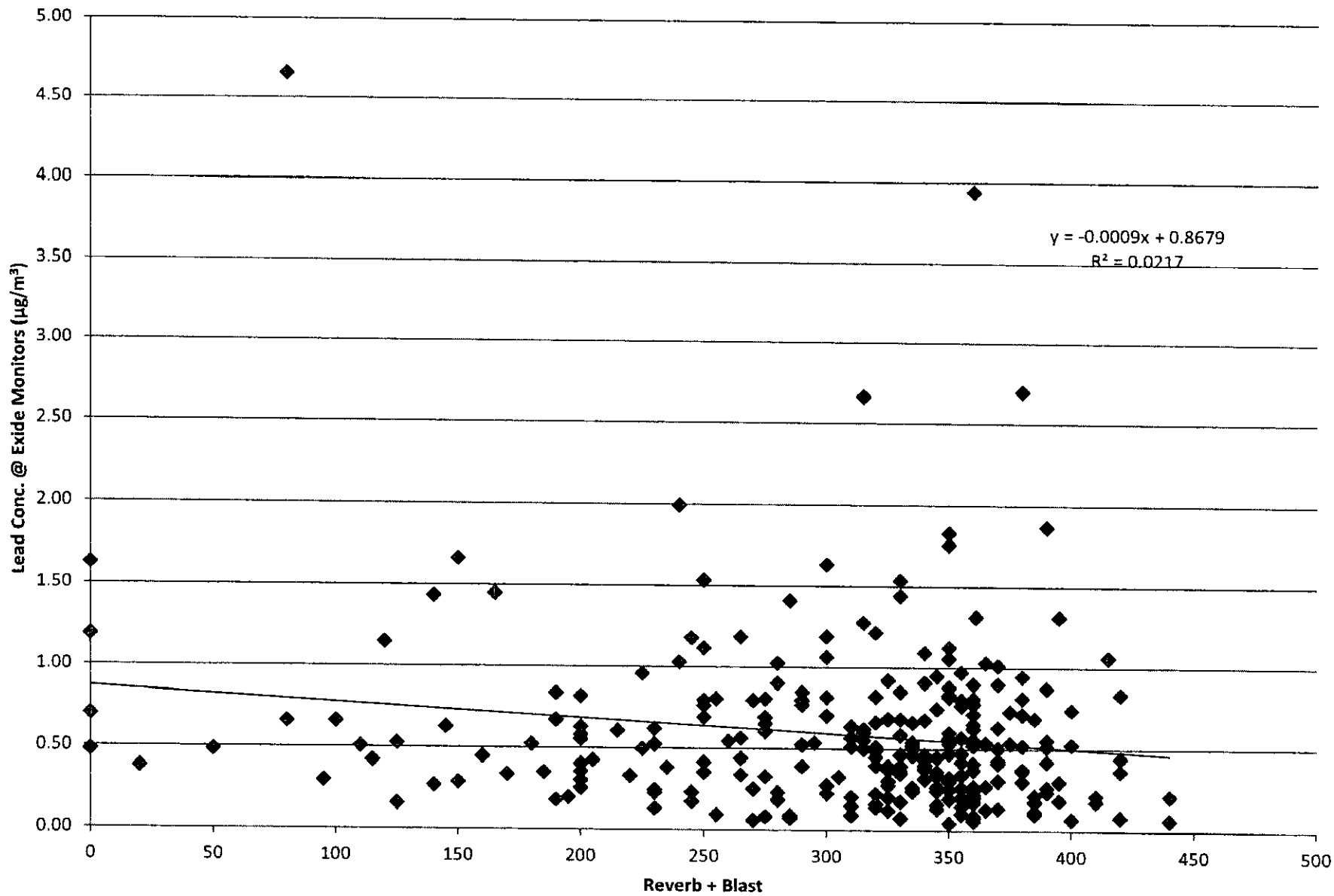


Figure 4f - Production: Reverb + Blast v. Concentration MID

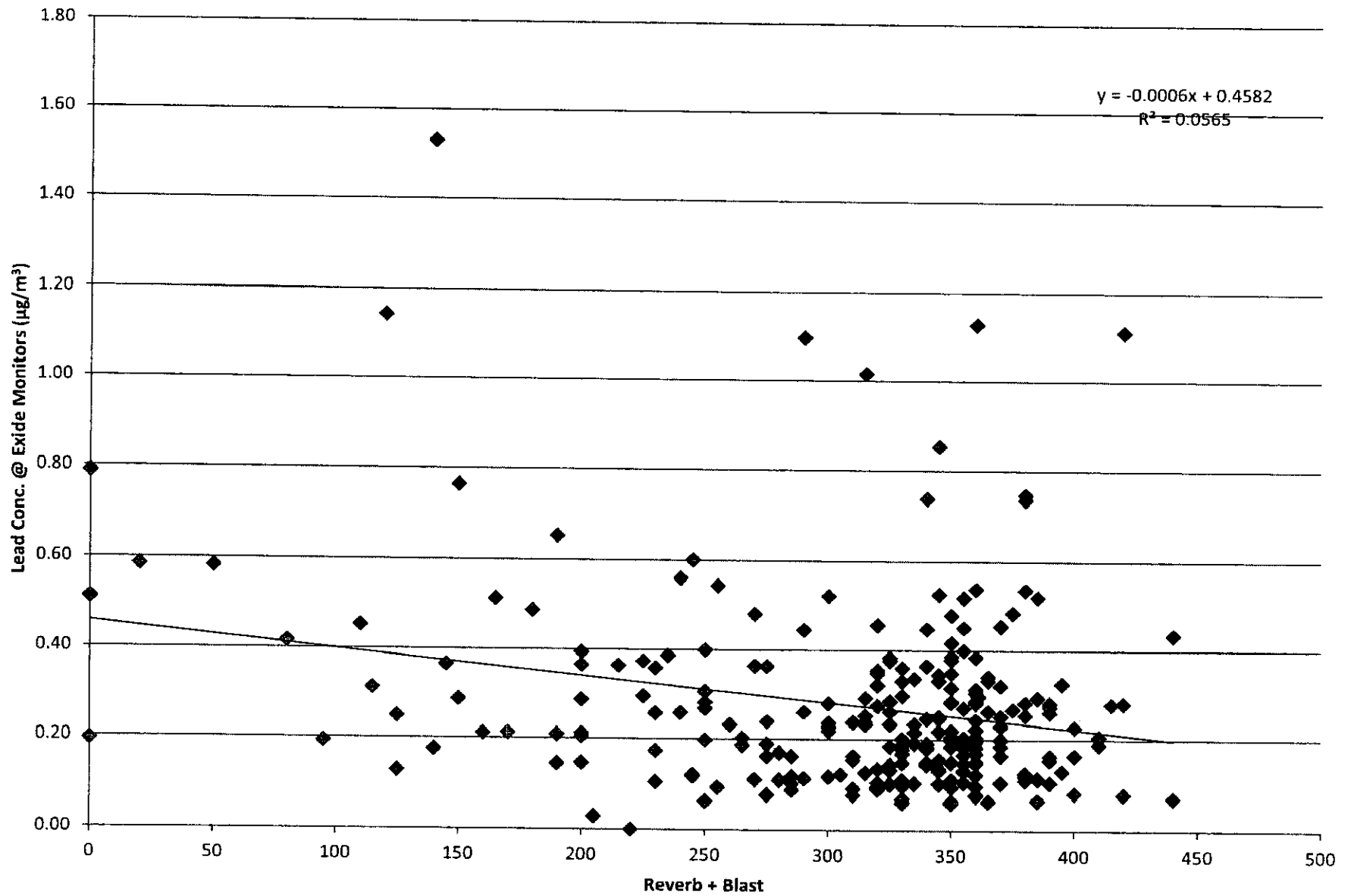


Figure 4g - Production: Reverb + Blast v. Concentration NE

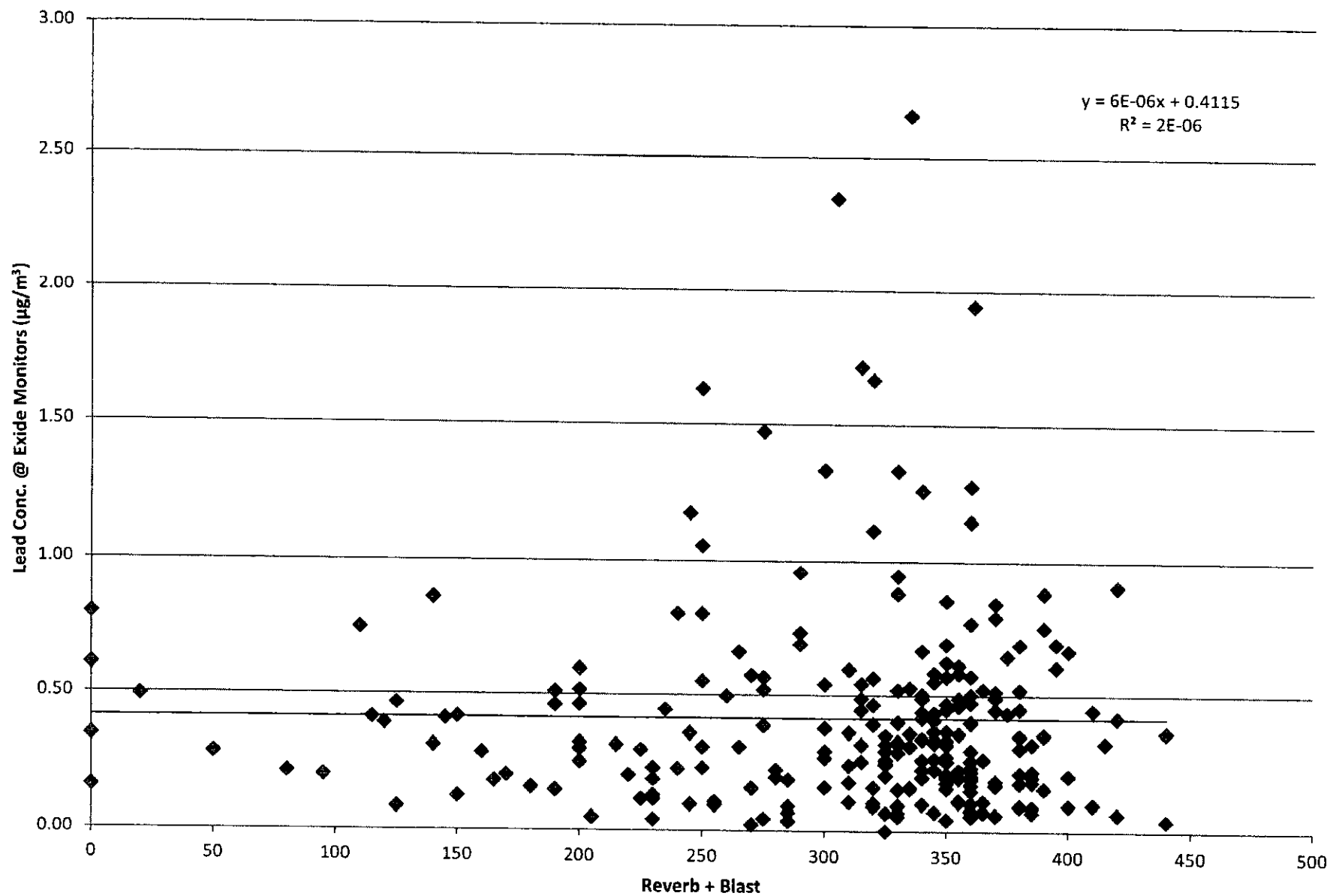


Figure 4h - Production: Reverb + Blast v. Concentration Rehrig

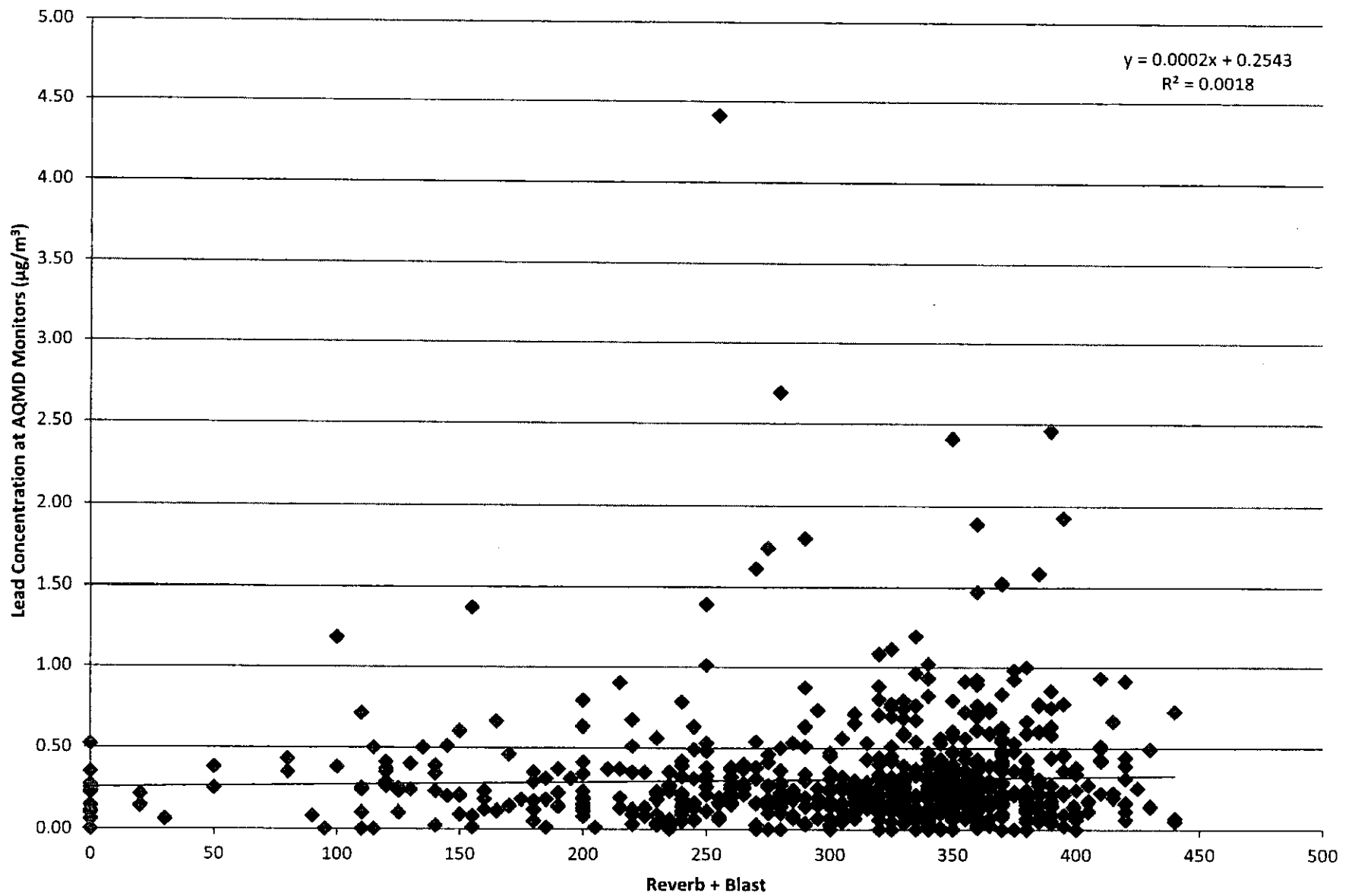
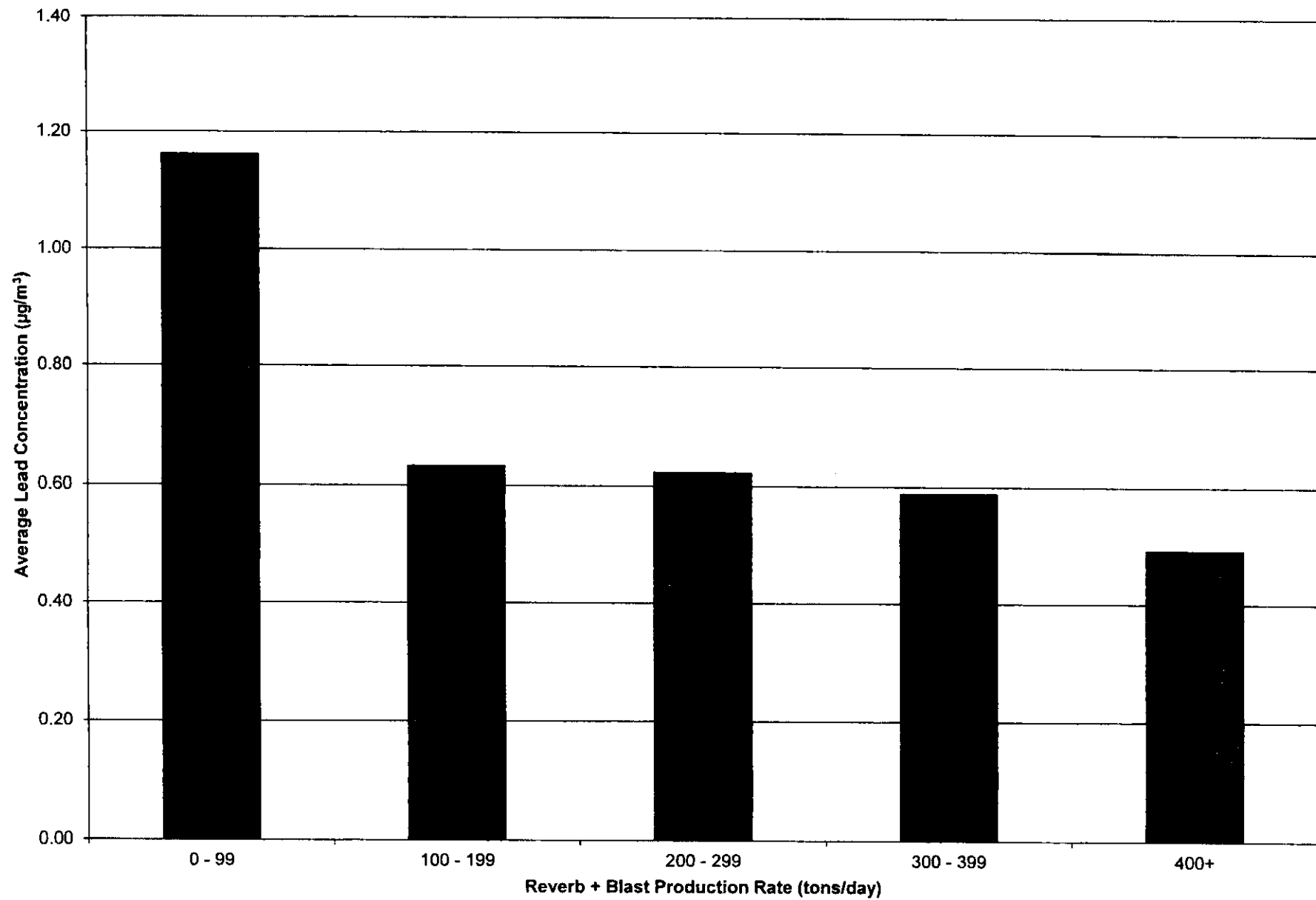


Figure 5 - Average Pb Concentration at On-Site N Monitor vs Production (Jan 2010 - Jan 2012)



Appendix A
List of Compliance Plan Measures

Appendix A – List of Compliance Plan Measures (1-20-2012)

	Action	Completion Date
1	Install door(s) between shipping and smelting to enhances negative pressure in refining/smelting and reduce draft from shipping.	Oct 2010
2	Install an automated door on the southeast end of the corridor connecting the reverb and blast feed rooms to reduce the amount of time that the door is open	Nov 2010
3	Install a new vehicle wheel wash station in the west yard of the plant	Jun 2011
4	Completely resurface the west yard of the facility to enhance the effectiveness of pavement cleaning activities	Jul 2011
5	Installed MERV 15 rated cartridge filters in the North and South Torit collectors	Jul 2011
6	Upgraded ride-on yard sweeper to a wet scrubbing unit for cleaning of plant yard pavement	Oct 2011
7	Install ventilated negative pressure enclosure for "Baghouse Row"	March/April 2012
8	Modify railcar dock at the south end of the smelting building to allow receiving of industrial plates and dedicated inside and outside forklifts.	Jun 2012
9	Replace strip curtains with doors at north and south end of RMPS building	Dec 2011
10	Install new vehicle and equipment decon and wash area at the north end of baghouse row as part of the baghouse row enclosure construction	Dec 2011
11	Eliminate and close mobile equipment wash area at south of plant	ASAP (Notify DTSC, pending DTSC approval)
12	Focused housekeeping and other horizontal surfaces in Baghouse Row, pending completion of enclosure of area	Nov 2010- Dec 2011
13	Install two backup diesel generators to supply electrical power to drive the fans serving the two process furnace exhaust baghouses and the two Torit collectors during power outages	Jun 2012
14	Install at least six (6) boot wash stations at exist of total containment buildings	June 2012
15	Designate one or more forklifts for exclusive use inside total containment buildings	June 2012
16	Apply elastomeric coating to the roof as well as vertical and horizontal surfaces of the battery breaker building to enhance the maintainability of the roof and prevent the development of pinhole leaks over time	Contingent Measure, per 5.2.2

Appendix A – List of Compliance Plan Measures (1-20-2012)

	Action	Completion Date
17	Curtailement of specific activities	Contingent. Per 5.2.7 and Appendix C Conditions 4-6
18	Potential Contingent Measures	Contingent. Per Appendix C, Conditions 8-11

Appendix B
December 1, 2011 Letter from the SCAQMD



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

December 1, 2011

Corey Vodvarka
Plant Manager
EXIDE TECHNOLOGIES
2700 South Indiana Street
Vernon, CA 90058

RE: Application No. 5267885 – Rule 1420.1 Compliance Plan

Dear Mr. Vodvarka:

The South Coast Air Quality Management District (AQMD) has received your Application No. 526785, submitted on August 30, 2011, for a Rule 1420.1 (Emission Standards for Lead-Acid Battery Recycling Facilities) Compliance Plan, for your lead-acid recycling facility located at 2700 South Indiana Street, Vernon, California 90058. The application for Rule 1420.1 Compliance Plan was submitted by Exide Technologies (Exide), as required by Rule 1420.1(g), due to exceedance of ambient air lead concentrations of 0.12 $\mu\text{g}/\text{m}^3$ averaged over 30 consecutive days on or beyond July 1, 2011 at one or more ambient monitors around the Exide facility. The AQMD staff has conducted a thorough review and evaluation of your Compliance Plan. Based on AQMD staff's detailed review and evaluation of your application, your Rule 1420.1 Compliance Plan is hereby disapproved for the following reasons:

1. Exide's Rule 1420.1 Compliance Plan states that compliance with the Rule 1420.1 (d)(2) limit of 0.15 $\mu\text{g}/\text{m}^3$ 30-day average ambient air lead concentration would be achieved by January 1, 2012, by the installation of a ventilated negative pressure total enclosure building over the "Baghouse Row" area. However, in a meeting held between Exide and AQMD staff on November 18, 2011, Exide informed AQMD that the total enclosure building over the Baghouse Row area will not be completed until March 2012. This construction completion date is inconsistent with the total enclosure building construction completion date of December 31, 2011, as specified in Exide's Rule 1420.1 Compliance Plan. Based upon the AQMD staff's ongoing review and assessment of ambient air monitoring data collected by both Exide and AQMD ambient monitors installed and operated around the Exide facility, periodic exceedance of 0.15 $\mu\text{g}/\text{m}^3$ 30-day average ambient air lead concentration limit of Rule 1420.1 are likely to continue after January 1, 2012, without the total enclosure building for the Baghouse Row area being completed and in full operation.
2. In addition, Exide's Rule 1420.1 Compliance Plan does not include sufficient information required under Rule 1420.1(g)(2)(A), describing additional lead emission reduction measures to achieve the ambient lead concentration of 0.15 $\mu\text{g}/\text{m}^3$ averaged over any consecutive days as required under Rule 1420.1 (d)(2). Specifically, Exide's Compliance

Plan has not sufficiently considered modifications to other lead control devices and installation of multi-stage lead control devices, as required pursuant to Rule 1420.1(g)(2)(A)(iii) and (iv), and is completely inadequate in including process changes including reduced throughput and conditional curtailments, as required pursuant to Rule 1420.1(g)(2)(A)(v) and (vi). Therefore, Exide must submit additional information which is sufficient and adequate to satisfy the following subparts in Rule 1420.1 (g)(2)(A):

- iii. Modifications to lead control devices;
- iv. Installation of multi-stage lead control devices;
- v. Process changes including reduced throughput limits; and
- vi. Conditional curtailments including, at a minimum, information specifying the curtailed processes, process amounts, and length of curtailment.

Rule 1420.1(g)(3) requires that upon disapproval of a Compliance Plan, the owner or operator of a lead-acid battery recycling facility shall resubmit another Compliance Plan within 30 days following the disapproval. The resubmitted Rule 1420.1 Compliance Plan shall not be deemed acceptable unless it includes all information necessary to address deficiencies identified in this disapproval letter. Also, pursuant to Rule 1420.1(g)(3), the resubmitted Compliance Plan is subject to plan fees as specified in AQMD Rule 306.

Due to the urgency of this matter, the AQMD is requesting that Exide resubmits the required Rule 1420.1 Compliance Plan with the requested information specified above **not later than December 15, 2011**. The AQMD plans to expeditiously review the resubmitted plan by December 30, 2011.

If you have any questions concerning the disapproval of Exide's Compliance Plan application, please contact the undersigned at 909-396-2664.

Very truly yours,



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

JC/CT/TGL/MAP

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

Appendix C
Conditions

APPENDIX C

CONDITIONS

1. Exide shall implement all lead mitigation measures described in the Compliance Plan resubmitted by Exide in January 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.
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 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.

12. Exide retains the right to seek relief from these Conditions via application to the Hearing Board, as appropriate.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

March 19, 2014

John Hogarth
Plant Manager
Exide Technologies (I.D. 124838)
2700 South Indiana Street:
Los Angeles, CA 90023

Dear Mr. Hogarth:

Conditional Approval of Rule 1420.1 - Continuous Furnace Pressure Monitoring (CFPM) Plan

The South Coast Air Quality Management District (AQMD) received your application (#560680) on February 11, 2014 for the reverberatory and blast furnace digital differential pressure monitoring systems. After carefully evaluating your application, we have decided to approve your continuous furnace pressure monitoring plan in accordance with the following conditions:

- 1) Exide shall install, operate and maintain, at one of the four proposed/indicated positions A-D specified in the submitted CFPM Plan, a continuous digital differential pressure monitoring system for the reverberatory furnace, as required by Rule 1420.1 (f)(3). The preferred location would be the one that is static and least affected by localized air flow, such as positions C or D.
- 2) Exide shall install, operate, maintain, and calibrate the digital differential pressure monitoring systems in accordance with all data and specifications submitted with the CFPM Plan under which this approval is granted, and by personnel properly trained in its operation.
- 3) Exide shall properly maintain the digital differential pressure monitoring systems and keep them in good operating conditions at all times. Exide shall keep on the premises a spare set of critical components such that a failed component will be able to be replaced within one hour. Exide shall report any breakdown of these systems in accordance with Rule 430.
- 4) Exide shall submit for approval a new continuous furnace pressure monitoring plan in case Exide plans to opt for the alternative differential furnace pressure provision of Rule 1420.1 (f)(3) and Item 5 of Rule 1420.1 Appendix 3.

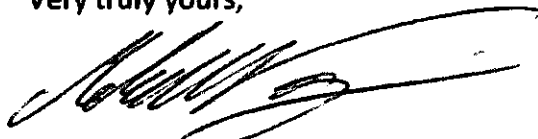
- 5) Exide shall submit for approval a new continuous furnace pressure monitoring plan prior to replacing any component or component location that differs from the specifications provided in the above-referenced CFPM Plan.

Also since pressure measurement is a critical component required under Rule 1420.1, it is recommended that Exide install redundant systems for each furnace as a back-up, and, Exide implement higher quality assurance (QA) procedures due to the importance of maintaining accurate readings at the lower, near zero pressures. The enhanced QA procedures should include but may not be limited: to making sure to zero the instrument and record the as-received zero offset during calibration events; and more frequent calibration intervals, such as weekly, biweekly, or monthly, until such time as it can be assured the significant zero and calibration drift does not occur over six month periods.

It is your responsibility to comply with all other applicable Rule 1420.1 requirements, all other applicable AQMD Rules and Regulations, and with all laws, ordinances, and regulations of other government agencies which are applicable to the operation of the equipment.

Should you have any questions regarding this conditional approval, please contact Mr. Charles Tupac at (909) 396-2684.

Very truly yours,



Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering and Compliance

MN:CDT

cc: Barry Wallerstein, SCAQMD
Kurt Wiese, SCAQMD