



INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Intermediate Operating Permit Number: OP2017-057
Expiration Date: AUG 02 2022
Installation ID: 101-0023
Project Number: 2013-08-024

Installation Name and Address

EnerSys Energy Products, Inc.
617 North Ridgeview Drive
Warrensburg, MO 64093-9301
Johnson County

Parent Company's Name and Address

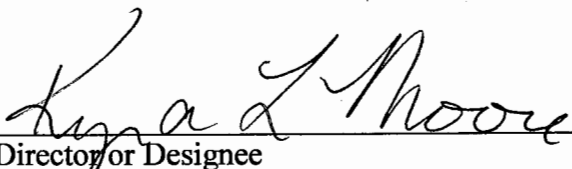
EnerSys, Inc.
2366 Bernville Road
Reading, PA 19605

Installation Description:

EnerSys Energy Products, Inc. manufactures specialty lead-acid batteries for various commercial and industrial applications. The facility consists of two plants located on the same site. Some of the lead oxide is manufactured at the installation, while the remainder is purchased for use as a raw material in the manufacture of the lead-acid batteries. The facility is a major source of Volatile Organic Pollutants (VOC), but has taken a voluntary emission limit to become a synthetic minor. The installation is not a named source, therefore fugitive emissions do not count towards major source applicability.


Prepared by:

David Buttig
Operating Permit Unit


Director or Designee
Department of Natural Resources

AUG 02 2017

Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

EnerSys Energy Products, Inc. manufactures specialty lead-acid batteries for various commercial and industrial applications. The facility consists of two plants located on the same site. Some of the lead oxide is manufactured at the installation, while the remainder is purchased for use as a raw material in the manufacture of the lead-acid batteries.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2013	2012	2011	2010	2009
Particulate Matter < Ten Microns (PM ₁₀)	0.82	0.90	0.94	0.91	1.94
Particulate Matter < 2.5 Microns (PM _{2.5})	0.54	0.64	0.08	0.07	0.33
Sulfur Oxides (SO _x)	0.30	0.31	0.33	0.04	0.04
Nitrogen Oxides (NO _x)	4.37	3.99	4.21	3.81	3.67
Volatile Organic Compounds(VOC)	50.82	43.65	33.50	27.87	27.88
Carbon Monoxide (CO)	3.64	3.32	3.50	3.20	3.09
Lead (Pb)	0.01	0.01	0.02	0.01	0.01
Hazardous Air Pollutants (HAPs)	0.00	0.00	0.00	0.00	0.00
Ammonia (NH ₃)	0.00	0.00	0.00	0.00	0.00

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and are subject to unit-specific emission limitations.

EQ Reference	Description
EP-1	Positive Oxide Silo (North Dock) Plant #1
EP-2	Negative Oxide Silo (North Dock) Plant#1
EP-3	Positive Oxide Silo (Mix room #1) Plant#1
EP-4	Negative Oxide Silo (Mix room #1) Plant #1
EP-7	Dry Oxide Mixing (Mix room #1 & #2) Plant #1
EP-11	Reclaim Furnace and Chill Caster- Lead Plant #1
EP-13	Central Vacuum System Plant #1
EP-19	Drying Oven #1 (East) Lead Plant #1
EP-20	Drying Oven #1 (West) Lead Plant #1
EP-21	Drying Oven #2 (East) Lead Plant #1
EP-22	Drying Oven #2 (West) Lead Plant #1
EP-37.7	Wirtz Continuous Caster (Concaster #1)
EP-37.8	Wirtz Continous Caster Reclaim Furnace
EP-37.9	Wirtz Continuous Caster (Concaster #2)
EP-38	Positive Oxide Transfer (Plant #2)
EP-39	Negative Oxide Transfer System
EP-42.1	Line #0 Cast-on-Strap, Melting Pot, and Support Processes (Replacing EP69)
EP-42.10.1	Encapsulator #0-1
EP-42.10.2	Encapsulator #0-2
EP-42.10.3	Encapsulator #0-3
EP-42.10.4	Encapsulator #0-4

EP-42.10.5	Encapsulator #0-5
EP-42.10.6	Encapsulator #0-6
EP-42.10.7	Encapsulator #0-7
EP-42.10.8	Encapsulator #0-8
EP-42.7	Cast-on-Strap #1 Plant 2
EP-42.7.1	Encapsulator #1-1
EP-42.7.2	Encapsulator #1-2
EP-42.7.3	Encapsulator #1-
EP-42.7.4	Encapsulator #1-4
EP-42.8	Cast-on-Strap #2 Plant 2
EP-42.8.1	Encapsulator #2-1
EP-42.8.2	Encapsulator #2-2
EP-42.8.3	Encapsulator #2-3
EP-42.8.4	Encapsulator #2-4
EP-42.9	Cast-on-Strap #3 Plant 2
EP-42.9.1	Encapsulator #3-1
EP-42.9.2	Encapsulator #3-2
EP-42.9.3	Encapsulator #3-3
EP-42.9.4	Encapsulator #3-4
EP-43 (43.1 thru 43.4)	Gen Drying Oven #1 Plant 2 (Curing Ovens # 1-4)
EP-44 (44.1 thru 44.4)	Gen Drying Oven #2 Plant 2 (Curing Ovens # 2-8)
EP-46	Central Vacuum System A Plant #2
EP-47	Central Vacuum System B Plant #2
EP-73	Central Vacuum System 2 Plant #1
EP-74.1	Gen Drying Oven #3 Plant 2 (Curing Oven # 9)
EP-75.1	Gen Drying Oven #4 Plant 2 (Curing Oven # 10)
EP-79	Paste Mixing Oxide Silo 2 (Gray Oxide-Plant 2 SE Dock)
EP-81	Lead Oxide Mill (Plant 2 South East Dock)
EP-82	Cast-on-Strap #4
EP-82	Encapsulator #4-1
EP-82	Encapsulator #4-2
EP-82	Encapsulator #4-3
EP-82	Encapsulator #4-4
EP-82	Encapsulator #4-5
EP-82	Encapsulator #4-6
EP-82	Encapsulator #4-7
EP-82	Encapsulator #4-8
EP-82	Pb Melting PotOxide Mill (Oxide Mill #1 Nugget Caster)
EP-82.1	Large VRLA Element Stacking 1 and Encapsulator
EP-82.2	Large VRLA Element Stacking 2 and Encapsulator
EP-82.3	Large VRLA Element Stacking 3
EP-82.4	Large VRLA Tinning
EP-82.5	Large VRLA Cast-on-Strap
EP-82.6	VRLA Element Stuffing
EP-83	Positive Mix Filter Receiver-Plant #2
EP-84	Negative Mix Filter Receiver-Plant #2
EP-85	Sovema Positive Scrubber-Mixing System-Plant #2

EP-86	Sovema Negative Scrubber-Mixing System-Plant #2
EP-87.1	8" Positive Paster /Cutter/Stacker-Plant #2
EP-87.2	8" Negative Paster /Cutter/Stacker-Plant #2
EP-87.3	24" Positive Paster /Cutter/Stacker-Plant #2
EP-87.4	24" Negative Paster /Cutter/Stacker-Plant #2
EP-93	Plate Storage
EP-96.1	Chill Cast Furnace-Lead, Plant 2
EP-96.2	PbSn Primary Furnace, Plant 2
EP-96.3	Pb Primary Furnace, Plant 2
EP-96.4	PbSn Reclaim, Plant 2,
EP-96.5	Pb Reclaim Furnace, Plant #2
EP-96.6	Multi-Alloy Strip Caster, Plant 2
EP-96.7	Oxide Mills 2&3 Nugget Caster
EP-96.8	COS (originally part of 123), EMP
EP-96.9	Encapsulator (originally part of 123), EMP
EP-96.10	Encapsulator (originally part of 123), EMP
EP-101	Cooling Silos (6) and Off Specs Silos (2)
EP-102	Lead Oxide Mill #2
EP-103	Lead Oxide #3
EP-104	Oxide Silo -Paste Mixing
EP-105	Oxide Silo -Paste Mixing
EP-106	Central VAC System-South Expansion
EP-107	Central VAC System-East Expansion
EP-108	Positive Mix Filter Receiver-Group 2
EP-109	Negative Mix Filter Receiver-Group 2
EP-110	Positive Mixing System Group 2
EP-111	Negative Mixing System Group 2
EP-112.1	Positive Paster/Cutter/Stacker-Group 2
EP-112.2	Negative Paster/Cutter/Stacker-Group 2
EP-113	Curing Oven #11
EP-114	Curing Oven #12
EP-115	Curing Oven #13
EP-116	Curing Oven #14
EP-117	Curing Oven #15
EP-118	Curing Oven #16
EP-119	Curing Oven #17
EP-120	Curing Oven #18
EP-121	Curing Oven #19
EP-122	Curing Oven #20
EP-123	Solder Dross Recovery Pot
EP-123	Cast-On-Strap Line #5
EP-123	Encapsulator #5-1
EP-123	Encapsulator #5-2
EP-123	Encapsulator #5-3
EP-125	Curing Oven #21

EMISSION UNITS WITHOUT UNIT SPECIFIC LIMITATIONS

The following list provides a description of the equipment, which do not have unit specific limitations at the time of permit issuance but count towards the facility wide emission limit outlined in Permit Condition PW001.

<u>Description</u>	<u>EIQ Reference</u>
Water Heaters(2) - Plant #1	EP-26
Space Heater - Plant #1	EP-27
Space Heater - Plant #1	EP-28
Space Heater - Plant #1	EP-29
Water Heaters (5 Total) Plant #1	EP-31
Water Heater - Plant #1	EP-32
Space Heater (East) Plant #1	EP-33
Space Heater (SE) Plant #1	EP-34
Space Heater (NE) Plant #1	EP-35
Space Heater (SW) Plant #3	EP-36
Space Heater Warehouse Expansion	EP-52
Space Heater Plant #2	EP-53
Water Htrs Womans Lkr Rm Plant #2 Natural Gas	EP-60
Heater #RT1 Mtg. Room East – Plant #2 (0.05 MMBtu/hr)	EP-61
Heater #RT2 Mtg. Room West – Plant #2 (0.163 MMBtu/hr)	EP-62
Heater #RT3 Café East – Plant #2 (0.163 MMBtu/hr)	EP-63
Heater #RT4 Café West – Plant #2 (0.204 MMBtu/hr)	EP-64
Heater #RT5 Woman’s Locker East – Plant #2 (0.10 MMBtu/hr)	EP-65
Heater #RT6 Woman’s Locker West – Plant #2 (0.10 MMBtu/hr)	EP-66
Heater #RT7 MRO North – Plant #2 (0.075 MMBtu/hr)	EP-67
Heater #RT9 MRO North – Plant #2 (0.10 MMBtu/hr)	EP-68
Air Make-Up Unit #1 – Plant #2 (3.575 MMBtu/hr)	EP-71
Air Make-Up Unit #2 – Plant #2 (3.575 MMBtu/hr)	EP-72
Space Heater New Expansion-Plant #2	EP-90
Space Heater New Expansion-Plant #2	EP-91
Space Heaters, 4 units East Expansion and 3 units South Expansion	EP-124
Hot-Water Pressure Washers	XX
Make-Up Air Unit S. of Maint. Shop – Plant #2 (0.75 MMBtu/hr)	EP-XXX
Grid Perforators – VOCs (Naphtha) – Plant #1	EP-16 through EP- 18
Grid Perforators – VOCs (Naphtha) – Plant #2	EP-48 through EP-50
Grid Perforators Large VRLA VOCs (Naphtha) – Plant #2	EP-94 and EP-95
Grid Perforators Large VRLA VOCs (Naphtha) – Plant #2	EP-97 through EP-100

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 032006-008, Issued March 10, 2006
Construction Permit 062013-001, Issued June 4, 2013

This permit condition applies to all emission units located at the facility including sources listed above under Emission Units Without Unit Specific Limitations.

Emission Limitations:

- 1.) The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive twelve-month period. [[Construction Permit 032006-008, Special Condition 3A](#)]
- 2.) The permittee shall emit less than 0.6 tons of lead from the entire installation in any consecutive twelve-month period. [[Construction Permit 062013-001, Special Condition 2.A](#)]

Monitoring & Recordkeeping Requirements:

Attachment A and Attachment B or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the VOC and lead emission limitations. [[Construction Permit 032006-008, Special Condition 3.C](#)]

Reporting:

- 1.) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records indicate that the VOC and/or lead emissions limitations have been exceeded. [[Construction Permit 032006-008, Special Condition 3.D](#)]
- 2.) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

<p>PERMIT CONDITION 1</p> <p>10 CSR 10-6.060 <i>Construction Permits Required</i></p> <p>Construction Permit 122008-008, Issued December 29, 2008</p>
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Emission Limitations:

1.) The permittee shall comply with the emission rates listed in in the following table:

Emission Point	Emission Unit Description	Control Device	Emission Rate (lb/hr)
96	Concaster 2	Baghouse	$1.71 \cdot 10^{-3}$
102	Ball Mill 2	Baghouse	$4.88 \cdot 10^{-4}$
103	Ball Mill 3	Baghouse	$4.88 \cdot 10^{-4}$
104	Transfer System #1	Baghouse	$4.76 \cdot 10^{-5}$
105	Transfer System#2	Baghouse	$4.76 \cdot 10^{-5}$
106	Central VAC System 1	HEPA filter	$1.63 \cdot 10^{-3}$
107	Central VAC System 1	HEPA filter	$8.16 \cdot 10^{-4}$
108	Positive Mix Filter Receiver #5	Baghouse	$6.35 \cdot 10^{-5}$
109	Negative Mix Filter Receiver #6	Baghouse	$1.03 \cdot 10^{-4}$
110	Positive Paste Mixer #5	Scrubber	$5.40 \cdot 10^{-4}$
111	Negative Paste Mixer #6	Scrubber	$1.32 \cdot 10^{-4}$
113	Curing Oven #11	None	$9.37 \cdot 10^{-5}$
114	Curing Oven #12	None	$9.37 \cdot 10^{-5}$
115	Curing Oven #13	None	$9.37 \cdot 10^{-5}$
116	Curing Oven #14	None	$9.37 \cdot 10^{-5}$
117	Curing Oven #15	None	$9.37 \cdot 10^{-5}$
118	Curing Oven #16	None	$9.37 \cdot 10^{-5}$
119	Curing Oven #17	None	$9.37 \cdot 10^{-5}$
120	Curing Oven #18	None	$9.37 \cdot 10^{-5}$
121	Curing Oven #19	None	$9.37 \cdot 10^{-5}$
122	Curing Oven #20	None	$9.37 \cdot 10^{-5}$
[Construction Permit 122008-008, Special Condition 2.B]			

- 2.) Control Device – Baghouses: The permittee shall control emissions from the emission points EP-96, EP-102, EP-103, EP-104, EP-105, EP-108 and EP-109 using baghouses as specified in the permit application for project 2007-12-048. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. Each baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Missouri Department of Natural Resources' employees may easily observe them. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 3.A]
- 3.) Control Device— High Efficiency Particulate Arresting (HEPA) Cartridge Filters: The permittee

- shall control emissions from the emission points EP-106 and EP-107 with HEPA cartridge filters as specified in the permit application for project 2007-12-048. [Special Condition 4.A]
- 4.) Each cartridge filter equipped with HEPA filter must be in operation at all times when the associated equipment is in operation. The permittee shall shut down any process controlled by a cartridge filter equipped with HEPA filter during a malfunction until such time that the installation or its vendor(s) make the required repairs to the control device. [Special Condition 4.B]
 - 5.) Each cartridge filter equipped with HEPA filter shall be operated and maintained in accordance with the manufacturer's specifications. The cartridge filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Missouri Department of Natural Resources' employees may easily observe them. [Special Condition 4.C]
 - 6.) Control Device—Scrubber: The permittee shall control emissions from the emission points EP-110 and EP-111 with scrubbers as specified in the permit application for project 2007-12-048. The scrubbers shall be in operation at all times the associated equipment is in use. The scrubbers shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 5.A]

Monitoring & Recordkeeping Requirements:

- 1.) The permittee shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition 3.B]
- 2.) High Efficiency Particulate Arresting (HEPA) Cartridge Filters: The permittee shall monitor and record the operating pressure drop across each cartridge filter equipped with HEPA filter at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition 4.D]
- 3.) The permittee shall maintain an operating and maintenance log for the baghouses, drum filters, HEPA Cartridge filters, and scrubbers which shall include the following:
 - a.) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b.) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Conditions 3.C, 4.E, & 5.C]

Reporting Requirements:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually, in the annual compliance certification, as required by Section V of this permit.

PERMIT CONDITION 2

10 CSR 10-6.060 *Construction Permits Required*
Construction Permit 032006-008A, Issued February 21, 2014

Operational Requirements:

- 1.) Control Device – Baghouses, Cartridge Filters and High Efficiency Particulate Air (HEPA) filters:
The permittee shall control the lead and PM₁₀ emissions from the equipment listed in Table 1 (See Attachment C) using baghouses, cartridge filters and HEPA filters as specified. [Special Condition 2.A]
- 2.) The baghouses, cartridge filters and HEPA filters shall be operated and maintained in accordance

with the manufacturer’s specifications. These control devices shall be equipped with a gauge or meter, which indicates the pressure drop across the devices. The gauges or meters shall be located such that the DNR employees may easily observe them. [Special Condition 2.B]

- a.) Replacement filters for the baghouses, cartridge filters and HEPA filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 2.C]
- 3.) ***Control Device – Wet Scrubber and Fume Filter:*** The permittee shall control emissions from the bulk sulfuric acid tank (EP10) using a fume filter (CD8) and the new paste mixing systems (EP85, EP86) using wet scrubbers (CD85 and CD86) as specified in the permit application. [Special Condition 3.A]
 - a.) The fume filter and scrubbers shall be operated and maintained in accordance with the manufacturer’s specifications. [Special Condition 3.B]

Monitoring & Recordkeeping Requirements:

- 1.) The permittee shall monitor and record the operating pressure drop across the baghouses, cartridge filters and HEPA filters at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty. [Special Condition 2.D]
- 2.) The permittee shall maintain a copy the manufacturer’s performance warranty on site for the baghouses, cartridge filters and HEPA filters. [Special Condition 2.E]
- 3.) The permittee shall maintain an operating and maintenance log for the baghouses, cartridge filters, HEPA filters and scrubbers which shall include the following:
 - a.) Incidents of malfunction, with impact on emissions, duration of events, probable causes, and corrective actions; and
 - b.) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Condition 2.F and 3.C]
- 4.) The permittee shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources’ personnel upon request. These records shall include MSDS for all materials used. [Special Condition 4.A]

Reporting Requirements:

- 1.) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit. [Special Condition 4.B]
- 2.) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

PERMIT CONDITION 3		
10 CSR 10-6.060 <i>Construction Permits Required</i>		
Construction Permit 062013-001, Issued June 4, 2013		
EIQ Reference #	Description	Control Device
82	Cast-on-Strap (COS) Line #4	HEPA Filter CD82
82	Cast-on-Strap (COS) Line #4	

82	Encapsulator #4-8	
82	Encapsulator #4-9	
82	Encapsulator #4-10	
82	Encapsulator #4-11	

Control Device Requirement – HEPA Filter

- 1.) The permittee shall control emissions from the two COS and four encapsulators using the existing HEPA Filter CD82 as specified in the permit application for project 2012-12-027. [Special Condition 3.A]
- 2.) The HEPA Filter shall be operated and maintained in accordance with the manufacturer's specifications. The HEPA Filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources’ employees may easily observe them. [Special Condition 3.B]
- 3.) Replacement filters for the HEPA Filter shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 3.C]

Monitoring and Recordkeeping:

- 1.) The permittee shall monitor and record the operating pressure drop across the HEPA Filter at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance specifications. [Special Condition 3.D]
- 2.) The permittee shall maintain a copy of the HEPA Filter manufacturer’s performance specifications on site. [Special Condition 3.E]
- 3.) The permittee shall maintain an operating and maintenance log for the HEPA Filter which shall include the following:
 - a.) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b.) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Condition 3.F]
- 4.) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. These records shall include MSDS for all materials used. [Special Condition 4.A]

Reporting:

- 1.) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit. [Special Condition 4.B]
- 2.) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

PERMIT CONDITION 4		
10 CSR 10-6.060 <i>Construction Permits Required</i>		
Construction Permit 042014-001, Issued April 2, 2014		
EIQ Reference #	Description	Control Device

EP-123	Solder Dross Recovery Pot	HEPA Filter
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Operational Requirements:

- 1) The permittee shall control emissions from the Solder Recovery Pot (EP-123) using a HEPA Filter as specified in the permit application. [\[Special Condition 1.A\]](#)
- 2) The HEPA Filter shall be operated and maintained in accordance with the manufacturer's specifications. The HEPA Filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. The gauge or meter shall be located such that Department of Natural Resources' employees may easily observe it. [\[Special Condition 1.B\]](#)
- 3) Replacement HEPA filters shall be kept on hand at all times. The HEPA filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [\[Special Condition 1.C\]](#)

Monitoring & Recordkeeping Requirements:

- 1.) The permittee shall monitor and record the operating pressure drop across the HEPA Filter at least once every 24 hours while the Solder Recovery Pot is in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [\[Special Condition 1.D\]](#)
- 2.) The permittee shall maintain a copy of the HEPA Filter manufacturer's performance warranty on site. [\[Special Condition 1.E\]](#)
- 3.) The permittee shall maintain an operating and maintenance log for the HEPA Filter which shall include the following: [\[Special Condition 1.F\]](#)
 - a.) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b.) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 4.) The permittee shall maintain all records required by this permit condition for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [\[Special Condition 2\]](#)

Reporting:

- 1.) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records indicate that the VOC and/or lead emissions limitations have been exceeded. [\[Special Condition 3D\]](#)
- 2.) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

PERMIT CONDITION 5

10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60 Subpart KK Standards of Performance for Lead-Acid Battery Manufacturing Plants
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart P National Emission Standards for Hazardous Air Pollutants for Lead Acid Battery Manufacturing Area Sources

See Attachment D for the listing of emission units subject to this permit condition and unit classifications under 40 CFR Part 60 Subpart KK.

Emission Limitation:

- 1.) The permittee shall not cause to be discharged into the atmosphere from any **grid casting facility**, any gases that contain lead in excess of 0.40 milligrams of lead per dry standard cubic meter of exhaust (0.000175 gr/dscf). [40 CFR 60.372(a)(1) and 40 CFR 63.11423(a)]
- 2.) The permittee shall not cause to be discharged into the atmosphere from any **paste mixing facility**, any gases that contain lead in excess of 1.00 milligram of lead per dry standard cubic meter of exhaust (0.000437 gr/dscf). [40 CFR 60.372(a)(2) and 40 CFR 63.11423(a)]
- 3.) The permittee shall not cause to be discharged into the atmosphere from any **three-process operation facility**, any gases that contain lead in excess of 1.00 milligram of lead per dry standard cubic meter of exhaust (0.000437 gr/dscf). [40 CFR 60.372(a)(3) and 40 CFR 63.11423(a)]
- 4.) The permittee shall not cause to be discharged into the atmosphere from any **lead oxide manufacturing facility** any gases that contain in excess of 5.0 milligrams of lead per kilogram of lead feed (0.010 lb/ton). [40 CFR 60.372(a)(4) and 40 CFR 63.11423(a)]
- 5.) The permittee shall not cause to be discharged into the atmosphere from any **lead reclamation facility** any gases that contain lead in excess of 4.50 milligrams of lead per dry standard cubic meter of exhaust (0.00197 gr/dscf). [40 CFR 60.372(a)(5) and 40 CFR 63.11423(a)]
- 6.) The permittee shall not cause to be discharged into the atmosphere from any **other lead-emitting operation**, any gases that contain in excess of 1.00 milligram of lead per dry standard cubic meter of exhaust (0.000437 gr/dscf). [40 CFR 60.372(a)(6) and 40 CFR 63.11423(a)]
- 7.) When two or more units (except lead oxide manufacturing) are ducted to a common control device, an equivalent standard for the total exhaust from the commonly controlled facilities shall be determined as follows: [40 CFR 60.372(b) and 40 CFR 63.11423(a)]

$$S_e = \sum_{a=1}^N S_a (Q_{sda} / Q_{sdT})$$

Where:

S_e = the equivalent standard for the total exhaust stream;

S_a = the actual standard for each exhaust stream ducted to the control device;

N = the total number of exhaust streams ducted to the control device;

Q_{sda} = the dry standard volumetric flow rate of the effluent gas stream from each facility ducted to the control device; and

Q_{sdT} = the total dry standard volumetric flow rate of all effluent gas streams ducted to the control device.

- 8.) The permittee shall not cause to be discharged into the atmosphere from these units any gases with greater than zero percent opacity (measured according to Method 9 and rounded to the nearest whole percentage) from all units except lead reclamation facility units which shall not emit gases with greater than five percent opacity (measured according to Method 9 and rounded to the nearest whole percentage). [40 CFR 60.372(a)(7) and (8)]
- 9.) The compliance standards and maintenance requirements contained in the NESHAP General Provisions - 40 CFR 63.6(a)-(d), (e)(1), (f)-(j) apply to these units. [40 CFR 63.11425(a)]

Monitoring and Recordkeeping:

- 1.) The permittee must perform semi-annual inspections and maintenance to ensure proper performance of each fabric filter which shall include inspection of structural and filter integrity. The permittee must record the results of these inspections. [40 CFR 63.11423(b)(2)(i)]
- 2.) The permittee must install, maintain, and operate a pressure drop monitoring device to measure the differential pressure drop across the fabric filter during all times when the process is operating. The pressure drop shall be recorded at least once per day. [40 CFR 63.11423(b)(2)(ii)]

- 3.) If a pressure drop is observed outside the normal operational ranges the permittee must record the incident and take immediate corrective action and record the actions taken.
- 4.) The permittee must submit a monitoring system performance report in accordance with §63.10(e). [40 CFR 63.11423(b)(2)(iv)(A)]
- 5.) The permittee shall install, calibrate, maintain, and operate a monitoring device that measures and records the pressure drop across the scrubbing systems(s), at least once every fifteen minutes. The monitoring device shall have an accuracy of ±5 percent over its operating range. [40 CFR 60.373 and 40 CFR 63.11423(b)(1)]
- 6.) The monitoring and recordkeeping requirements contained in the NESHAP General Provisions - 40 CFR 63.8 and 63.10(a)-(c), (d)(1)-(4), (e) and (f) apply to these units. [40 CFR 63.11425(a)]
- 7.) All records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
- 8.) All records shall be maintained for five years.

Performance Testing Requirements:

- 1.) The permittee must conduct performance testing as required by 40 CFR Part 60.374. [40 CFR 63.11423(c)]
- 2.) Existing sources are not required to conduct a performance test if a prior performance test was conducted using the same methods specified in 40 CFR 60.374 and either no process changes have been made since the test, or it can be demonstrated that the results of the performance test, with or without adjustments, reliably demonstrate compliance with the emission limitations despite process changes. [40 CFR 60.11423(c)(1)]
- 3.) The permittee shall determine compliance with the lead standards for these emission units as follows:
 - a) Method 12 shall be used to determine the lead concentration and, if applicable, the volumetric flow rate (Q_{sda}) of the effluent gas. The sampling time and sample volume for each run shall be at least sixty minutes and 0.85 dscm (30 dscf). [40 CFR 60.374(b)(1)]
 - b) When different operations in a three-process operation facility are ducted to separate control devices, the lead emission concentration (C) from the facility shall be determined as follows: [40 CFR 60.374(b)(2)]
$$C = \left[\sum_{a=1}^N (C_a Q_{sda}) \right] / \sum_{a=1}^N Q_{sda}$$
Where:
C=concentration of lead emissions for the entire facility, mg/dscm (gr/dscf);
Ca=concentration of lead emissions from facility "a", mg/dscm (gr/dscf);
Qsda=volumetric flow rate of effluent gas from facility "a", dscm/hr (dscf/hr); and
N=total number of control devices to which separate operations in the facility are ducted.
 - c) Method 9 and the procedures in §60.11 shall be used to determine opacity. The opacity numbers shall be rounded off to the nearest whole percentage. [40 CFR 60.374(b)(3)]
- 4.) The performance testing requirements contained in the NESHAP General Provisions - 40 CFR 63.7 apply to these units. [40 CFR 63.11425(a)]

Reporting:

- 1.) The reporting requirements contained in the NESHAP General Provisions - 40 CFR 63.10(a)-(c), (d)(1)-(4), (e) and (f) apply to these units. [40 CFR 63.11425(a)]

- 2.) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually, in the annual compliance certification, as required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

10 CSR 10-6.045 Open Burning Requirements

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances.
- (3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- (4) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- (5) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and

- j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control

Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone
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- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed

refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable emission limit. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
- a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Malcolm Gavant, General Manager- VP Reserve Power Business. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
 - or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment C - Control Device Listing from Table 1 of CP 032006-008A

Emission Point No.	Primary Control Device	Secondary Control Device	Control Device No.	Emission Unit Description
1	X	H	CD1	Positive Oxide Silo
2	X	H	CD2	Negative Oxide Silo
3	X	H	CD3	Positive Oxide Silo
4	X	H	CD4	Negative Oxide Silo
7	X	-	CD7	Dry Oxide Mixing
11	X	-	CD6	Reclaim Furnace and Chill Caster
13	X	H	CD5	Central Vacuum System
96.1	X	-	CD16	Continuous Chill Caster
96.2	X	-	CD16	PbSn Primary Furnace
96.3	X	-	CD16	Pb Primary Furnace
96.4	X	-	CD16	PbSn Reclaim Furnace
96.5	X	-	CD16	Pb Reclaim Furnace
96.6	X	-	CD16	Multi-Alloy Strip Caster
37.7	X	-	CD16	Wirtz Continuous Caster
38	X	H	CD17	Positive Oxide Transfer System
39	X	H	CD18	Negative Oxide Transfer System
42.7	X	H	CD21	Cast-On-Strap #1
42.7.1	X	H	CD21	Encapsulator #1-1
42.7.2	X	H	CD21	Encapsulator #1-2
42.7.3	X	H	CD21	Encapsulator #1-
42.7.4	X	H	CD21	Encapsulator #1-4
42.8	X	H	CD21	Cast-On-Strap #2
42.8.1	X	H	CD21	Encapsulator #2-1
42.8.2	X	H	CD21	Encapsulator #2-2
42.8.3	X	H	CD21	Encapsulator #2-3
42.8.4	X	H	CD21	Encapsulator #2-4
42.9	X	H	CD21	Cast-On-Strap #3
42.9.1	X	H	CD21	Encapsulator #3-1
42.9.2	X	H	CD21	Encapsulator #3-2
42.9.3	X	H	CD21	Encapsulator #3-3
42.9.4	X	H	CD21	Encapsulator #3-4
42.10.1	X	H	CD42	Encapsulator #0-1
42.10.2	X	H	CD42	Encapsulator #0-2
42.10.3	X	H	CD42	Encapsulator #0-3
42.10.4	X	H	CD42	Encapsulator #0-4
42.10.5	X	H	CD21	Encapsulator #0-5
42.10.6	X	H	CD21	Encapsulator #0-6
42.10.7	X	H	CD21	Encapsulator #0-7
42.10.8	X	H	CD21	Encapsulator #0-8

Note 1: H = High Efficiency Particulate Air (HEPA) Filter, X = Bag Filter or Cartridge Filter

Attachment C - Control Device Listing from Table 1 of CP 032006-008A (Continued)

Emission Point No.	Primary Control Device	Secondary Control Device	Control Device No.	Emission Unit Description
46	X	H	CD22	Central VAC System A
47	X	H	CD23	Central VAC System B
73	X	H	CD23	Central Vacuum
79	X	H	CD79	Paste Mix Storage Silo
81	X	H	CD81	Oxide Mill #1
82	X	H	CD82	Cast-on-Strap #4
82	X	H	CD82	Encapsulator #4-1
82	X	H	CD82	Encapsulator #4-2
82	X	H	CD82	Encapsulator #4-3
82	X	H	CD82	Encapsulator #4-4
82	X	H	CD82	Encapsulator #4-5
82	X	H	CD82	Encapsulator #4-6
82	X	H	CD82	Encapsulator #4-7
82	X	H	CD82	Pb Melting Pot Oxide Mill#1 (Nugget Caster)
82.1	X	H	CD82	Large VRLA Element Stacking 1
82.2	X	H	CD82	Large VRLA Element Stacking 2
82.3	X	H	CD82	Large VRLA Element Stacking 3
82.4	X	H	CD82	Large VRLA Tinning
82.5	X	H	CD82	Large VRLA Cast-on-Strap
82.6	X	H	CD82	VRLA Element Stuffing
83	X	H	CD83	Positive Mix Filter Receiving
84	X	H	CD84	Negative Mix Filter Receiving
87	X	H	CD87	8" Positive Paster/Cutter/Stacker
87	X	H	CD87	8" Negative Paster/Cutter/Stacker
87	X	H	CD87	24" Positive Paster/Cutter/Stacker
87	X	H	CD87	24" Negative Paster/Cutter/Stacker

Note 1: H = High Efficiency Particulate Air (HEPA) Filter, X = Bag Filter or Cartridge Filter

Note 2: CD21 and CD42 vent internally to the facility

Attachment D - 40 CFR 60 Subpart KK Emission Unit Classification

EQ Ref.#	Description	Subpart KK Classification ¹
1	Positive Oxide Silo (North Dock) Plant #1	Paste Mixing Facility
2	Negative Oxide Silo (North Dock) Plant#1	Paste Mixing Facility
3	Positive Oxide Silo (Mix room #1) Plant#1	Paste Mixing Facility
4	Negative Oxide Silo (Mix room #1) Plant #1	Paste Mixing Facility
7	Dry Oxide Mixing (Mix room #1 & #2) Plant #1	Paste Mixing Facility
11	Reclaim Furnace - Lead Plant #1	Lead Reclamation Facility
13	Central Vacuum System Plant #1	Other Lead-Emitting Operation
19	Drying Oven #1 (East) Lead Plant #1	Other Lead-Emitting Operation
20	Drying Oven #1 (West) Lead Plant #1	Other Lead-Emitting Operation
21	Drying Oven #2 (East) Lead Plant #1	Other Lead-Emitting Operation
22	Drying Oven #2 (West) Lead Plant #1	Other Lead-Emitting Operation
37.7	Wirtz Continuous Caster (Concaster #1)	Grid Casting Facility
37.8	Wirtz Continous Caster Reclaim Furnace	Grid Casting Facility
37.9	Wirtz Continuous Caster (Concaster #2)	Grid Casting Facility
38	Positive Oxide Transfer (Plant #2)	Paste Mixing Facility
39	Negative Oxide Transfer System	Paste Mixing Facility
42.1	Line #0 Cast-on-Strap, Melting Pot and Support Processes	Three-Process Operation Facility
42.10.1	Encapsulator #0-1	Three-Process Operation Facility
42.10.2	Encapsulator #0-2	Three-Process Operation Facility
42.10.3	Encapsulator #0-3	Three-Process Operation Facility
42.10.4	Encapsulator #0-4	Three-Process Operation Facility
42.10.5	Encapsulator #0-5	Three-Process Operation Facility
42.10.6	Encapsulator #0-6	Three-Process Operation Facility
42.10.7	Encapsulator #0-7	Three-Process Operation Facility
42.10.8	Encapsulator #0-8	Three-Process Operation Facility
42.7	Cast-on-Strap #1 Plant 2	Three-Process Operation Facility
42.7.1	Encapsulator #1-1	Three-Process Operation Facility
42.7.2	Encapsulator #1-2	Three-Process Operation Facility
42.7.3	Encapsulator #1-	Three-Process Operation Facility
42.7.4	Encapsulator #1-4	Three-Process Operation Facility
42.8	Cast-on-Strap #2 Plant 2	Three-Process Operation Facility
42.8.1	Encapsulator #2-1	Three-Process Operation Facility
42.8.2	Encapsulator #2-2	Three-Process Operation Facility
42.8.3	Encapsulator #2-3	Three-Process Operation Facility
42.8.4	Encapsulator #2-4	Three-Process Operation Facility
42.9	Cast-on-Strap #3 Plant 2	Three-Process Operation Facility
42.9.1	Encapsulator #3-1	Three-Process Operation Facility
42.9.2	Encapsulator #3-2	Three-Process Operation Facility
42.9.3	Encapsulator #3-3	Three-Process Operation Facility

EQ Ref.#	Description	Subpart KK Classification ¹
42.9.4	Encapsulator #3-4	Three-Process Operation Facility
43 (43.1 thru 43.4)	Gen Drying Oven #1 Plant 2 (Curing Ovens # 1-4)	Other Lead-Emitting Operation
44 (44.1 thru 44.4)	Gen Drying Oven #2 Plant 2 (Curing Ovens # 5-8)	Other Lead-Emitting Operation
46	Central Vacuum System A Plant #2	Other Lead-Emitting Operation
47	Central Vacuum System B Plant #2	Other Lead-Emitting Operation
73	Central Vacuum System 2 Plant #1	Other Lead-Emitting Operation
74.1	Gen Drying Oven #3 Plant 2 (Curing Ovens # 9)	Other Lead-Emitting Operation
75.1	Gen Drying Oven #4 Plant 2 (Curing ovens # 10)	Other Lead-Emitting Operation
79	Paste Mixing Oxide Silo 2 (Gray Oxide-Plant 2 SE Dock)	Paste Mixing Facility
81	Lead Oxide Mill (Plant 2 South East Dock)	Lead oxide manufacturing facility
82	Cast-on-Strap #4	Three-Process Operation Facility
82	Encapsulator #4-1	Three-Process Operation Facility
82	Encapsulator #4-2	Three-Process Operation Facility
82	Encapsulator #4-3	Three-Process Operation Facility
82	Encapsulator #4-4	Three-Process Operation Facility
82	Encapsulator #4-5	Three-Process Operation Facility
82	Encapsulator #4-6	Three-Process Operation Facility
82	Encapsulator #4-7	Three-Process Operation Facility
82	Encapsulator #4-8	Three-Process Operation Facility
82	Pb Melting Pot Oxide Mill (Oxide Mill #1 Nugget Caster)	Other Lead-Emitting Operation
82.1	Large VRLA Element Stacking 1 and Encapsulator	Three-Process Operation Facility
82.2	Large VRLA Element Stacking 2 and Encapsulator	Three-Process Operation Facility
82.3	Large VRLA Element Stacking 3	Three-Process Operation Facility
82.4	Large VRLA Tinning	Three-Process Operation Facility
82.5	Large VRLA Cast-on-Strap	Three-Process Operation Facility
82.6	VRLA Element Stuffing	Three-Process Operation Facility
83	Positive Mix Filter Receiver-Plant #2	Paste Mixing Facility
84	Negative Mix Filter Receiver-Plant #2	Paste Mixing Facility
85	Sovema Positive Scrubber-Mixing System-Plant #2	Paste Mixing Facility
86	Sovema Negative Scrubber-Mixing System-Plant #2	Paste Mixing Facility
87.1	8" Positive Paster /Cutter/Stacker-Plant #2	Three-Process Operation Facility
87.2	8" Negative Paster /Cutter/Stacker-Plant #2	Three-Process Operation Facility
87.3	24" Positive Paster /Cutter/Stacker-Plant #2	Three-Process Operation Facility
87.4	24" Negative Paster /Cutter/Stacker-Plant #2	Three-Process Operation Facility
93	Plate Storage	Other Lead-Emitting Operation
96.1	Chill Cast Furnace-Lead, Plant 2	Grid Casting Facility
96.1	Encapsulator (originally part of 123), EMP	Three-Process Operation Facility
96.2	PbSn Primary Furnace, Plant 2	Grid Casting Facility
96.3	Pb Primary Furnace, Plant 2	Grid Casting Facility
96.4	PbSn Reclaim, Plant 2	Lead Reclamation Facility

EQ Ref.#	Description	Subpart KK Classification ¹
96.5	Pb Reclaim Furnace, Plant #2	Lead Reclamation Facility
96.6	Multi-Alloy Strip Caster, Plant 2	Grid Casting Facility
96.7	Oxide Mills 2&3 Nugget Caster	Other Lead-Emitting Operation
96.8	COS (originally part of 123), EMP	Three-Process Operation Facility
96.9	Encapsulator (originally part of 123), EMP	Three-Process Operation Facility
96.10	Encapsulator (originally part of 123), EMP	Three-Process Operation Facility
101	Cooling Silos (6) and Off Specs Silos (2)	Paste Mixing Facility
102	Lead Oxide Mill #2	Lead oxide manufacturing facility
103	Lead Oxide #3	Lead oxide manufacturing facility
104	Oxide Silo -Paste Mixing	Paste Mixing Facility
105	Oxide Silo -Paste Mixing	Paste Mixing Facility
106	Central VAC System-South Expansion	Other Lead-Emitting Operation
107	Central VAC System-East Expansion	Other Lead-Emitting Operation
108	Positive Mix Filter Receiver-Group 2	Paste Mixing Facility
109	Negative Mix Filter Receiver-Group 2	Paste Mixing Facility
110	Positive Mixing System Group 2	Paste Mixing Facility
111	Negative Mixing System Group 2	Paste Mixing Facility
112.1	Positive Paster/Cutter/Stacker-Group 2	Three-Process Operation Facility
112.2	Negative Paster/Cutter/Stacker-Group 2	Three-Process Operation Facility
123	Solder Dross Recovery Pot	Lead Reclamation Facility
123	Cast-On-Strap Line #5	Three-Process Operation Facility
123	Encapsulator #5-1	Three-Process Operation Facility
123	Encapsulator #5-2	Three-Process Operation Facility
123	Encapsulator #5-3	Three-Process Operation Facility
125	Curing Oven #21	Other Lead-Emitting Operation
126	Curing Oven #22	Other Lead-Emitting Operation

¹§60.371 defines the units as follows:

- (a) **Grid Casting Facility** means the facility which includes all lead melting pots and machines used for casting the grid used in battery manufacturing. [§60.371(a)]
- (b) **Lead oxide manufacturing facility** means a facility that produces lead oxide from lead, including product recovery. [§60.371(c)]
- (c) **Lead Reclamation Facility** means the facility that remelts lead scrap and casts it into lead ingots for use in the battery manufacturing process, and which is not a furnace affected under subpart L of this part. [§60.371(d)]
- (d) **Other Lead-Emitting Operation** means any lead-acid battery manufacturing plant operation from which lead emissions are collected and ducted to the atmosphere and which is not part of a grid casting, lead oxide manufacturing, lead reclamation, paste mixing, or three-process operation facility, or a furnace affected under subpart L of this part. [§60.371(e)]
- (e) **Paste Mixing Facility** means the facility including lead oxide storage, conveying, weighing, metering, and charging operations; paste blending, handling, and cooling operations; and plate pasting, takeoff, cooling, and drying operations. [§60.371(f)]
- (f) **Three-Process Operation** facility means the facility including those processes involved with plate stacking, burning or strap casting, and assembly of elements into the battery case. [§60.371(g)]

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee’s responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received February 14, 2014;
- 2) 2013 Emissions Inventory Questionnaire,;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Construction Permit 032006-008, Issued March 10, 2006;
- 5) Construction Permit 122008-008, Issued December 29, 2008;
- 6) Construction Permit 12008-008A, Issued December 10, 2010
- 7) Construction Permit 062013-001, Issued June 4, 2013
- 8) Construction Permit 032006-008A, Issued February 20, 2014;
- 9) Construction Permit 042014-001, Issued April 2, 2014
- 10) Email received November 26, 2014, from the Mr. John W. Staple, Facilities Engr Mgr, containing the facility comments on the proposed draft which were incorporated into this permit.

The following table is a list of the facilities emission units and associated control devices (if any) that was submitted during facility review period as supplemental information.

EP No.	Primary Control Device	Secondary Control Device	Type of Emission	CD #	Emission Unit Description
82	X	H	I	CD82	Encapsulator #4-11
82	X	H	I	CD82	Pb Melting Pot Oxide Mill #1 (Nugget Caster)
82.1	X	H	I	CD82-South	Large VRLA Element Stacking 1 (Encapsulator #1 line #6)
82.2	X	H	I	CD82-South	Large VRLA Element Stacking 3 (Encapsulator #1 line #6)
82.3	X	H	I	CD82-South	Large VRLA Element Stacking 3 (line #6)
82.4	X	H	I	CD82-South	Large VRLA Tinning (line #6)
82.5	X	H	I	CD82-South	Large VRLA Cast-On-Strap (line #6)
82.6	X	H	I	CD82-South	VRLA Element Stuffing (line #6)
83	X	H	E	CD83	Positive Filter Receiving System #1 (Plant #2)

EP No.	Primary Control Device	Secondary Control Device	Type of Emission	CD #	Emission Unit Description
84	X	H	E	CD84	Negative Filter Receiving System #1 (Plant #2)
85	S	-	E	CD85	Sovema Positive Paste Mixing System Scrubber # 1 (Plant #2)
86	S	-	E	CD86	Sovema Negative Paste Mixing System Scrubber # 1 (Plant #2)
87.1	X	H	I	CD87	8" Positive Paster/Cutter/Stacker (Plant #2)
87.2	X	H	I	CD87	8" Negative Paster/Cutter/Stacker (Plant #2)
87.3	X	H	I	CD87	24" Positive Paster/Cutter/Stacker (Plant #2)
87.4	X	H	N/A	CD87	24" Negative Paster/Cutter/Stacker (Plant #2)
93	N/A	N/A	N/A	N/A	Plate Storage
94/95	N/A	N/A	E	N/A	VRLA Perforator #8 -Gen (L6 perforator w/ 2 emission pts.) Plant #2
96.1	X	-	E	CD96	Chill Cast Furnace-Lead Plant #2
96.2	X	-	E	CD96	PbSn Primary Furnace Plant #2
96.3	X	-	E	CD96	Pb Primary Furnace, Plant #2
96.4	X	-	E	CD96	PbSn Reclaim Furnace, Plant #2
96.5	X	-	E	CD96	Pb Reclaim Furnace, Plant #2
96.6	X	-	E	CD96	Multi-Alloy Strip Caster, Plant #2
96.7	X	-	E	CD96	Oxide Mills 2&3 Nugget Caster
96.8	X	-	E	CD96	COS (originally part of 123),EMP
96.9	X	-	E	CD96	Encapsulator (originally part of 123), EMP
96.10	X	-	E	CD96	Encapsulator (originally part of 123), EMP
97	N/A	N/A	E	N/A	VRLA Perforator # 1-Gen (Plant #2)
98	N/A	N/A	E	N/A	VRLA Perforator #7 -Gen (Plant #2)
99	N/A	N/A	E	N/A	VRLA Perforator #5 -Gen (Plant #2)
100	N/A	N/A	E	N/A	VRLA Perforator #6 -Gen (Plant #2)
101	X	H	I	CD101	6 cooling silos,2 off-spec silos
102	X	H	E	CD102	Oxide Mill # 2 (Plant #2)
103	X	H	E	CD103	Oxide Mill # 3 (Plant #2)
104	X	H	E	CD104	Storage Silo- Paste Mixing Plant #2
105	X	H	E	CD105	Storage Silo- Paste Mixing Plant #2 Oxide Mill
106	X	H	E	CD106	Central Vac 1-Gen, South Expansion (Plant #2)
107	X	H	E	CD107	Central Vac 2-Gen, East Expansion (Plant #2)
108	X	H	E	CD108	Positive Filter Receiving System Group #2
109	X	H	E	CD109	Negative Filter Receiving System Group #2
110	S	-	E	CD110	Positive Paste Mixing System Scrubber Group #2
111	S	-	E	CD111	Negative Paste Mixing System Scrubber Group #2
112.1	X	-	I	CD112	Positive Paster/Cutter/Stacker Group #2
112.2	X	-	I	CD112	Negative Paster/Cutter/Stacker Group #2
113	N/A	N/A	E	N/A	Curing Oven #11
14	N/A	N/A	E	N/A	Curing Oven #12

EP No.	Primary Control Device	Secondary Control Device	Type of Emission	CD #	Emission Unit Description
115	N/A	N/A	E	N/A	Curing Oven #13
116	N/A	N/A	E	N/A	Curing Oven #14
117	N/A	N/A	E	N/A	Curing Oven #15
118	N/A	N/A	E	N/A	Curing Oven #16
119	N/A	N/A	E	N/A	Curing Oven #17
120	N/A	N/A	E	N/A	Curing Oven #18
121	N/A	N/A	E	N/A	Curing Oven #19
122	N/A	N/A	E	N/A	Curing Oven #20
123	X	H	I	CD123	Cast-On-Strap Line # 5
123	X	H	I	CD123	Encapsulator #5-1
123	X	H	I	CD123	Encapsulator #5-2
123	X	H	I	CD123	Encapsulator #5-3
123	X	H	I	CD123	Solder Dross Recovery Pot
125	N/A	N/A	E	N/A	Curing Oven #21
126	N/A	N/A	E	N/A	Curing Oven #22

Notes:

H =HEPA (High Efficiency Particulate Arresting -Filter Cartridge)
X =Bag Filter or Cartridge Filter
A= Acid Fume Filter
S= Lead Extraction Wet Scrubber
N/A = Not Applicable (No Control Device)
E= Externally Venting
I= Internally Venting

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit History

Permit Number	Description	Notes
0284-011	Lead acid battery plant	1
0885-008	Lead smelting furnace	1
0590-013	Central vacuum cleaner system, battery core drying, melting pot and filters	1
1090-008	New continuous grid casting process	1
0791-002	Lead oxide transfer from two storage silos and mixing room	1
1292-001	Replacement of electric melting pot (lead melting pot)	1
1193-001	Modify plate perforation lube system from kerosene to a “vanishing oil”	1
1294-012	Installation of three new grid perforators, replacement of a continuous grid caster with a continuous chill caster, and construction of a new lead manufacturing facility at the same site.	1
0495-017	New drying oven	1

0196-014	Installation of additional equipment in facility permitted by 1294-012	1
0896-020	Transfer of existing natural gas fired COS from Plant 1 to Plant 2	1
092000-004	New lead acid battery manufacturing line	1
052001-019	Temporary permit for testing a COS machine	1
092000-004A	Modification of performance testing requirements	1
112003-012	New lead oxide manufacturing process line and replacement of an existing weight hopper within the existing paste mixing process	1
122004-010	Phase I of the Large VRLA Cell Assembly Line	1
032006-008	Phase II of the VRLA Cell Assembly Line	2,3
122008-008	Installation of new lead acid battery line	4,5
122008-008A	EP-37 burner replacement and moving Line #1 from one location to another	3
032006-008A	True-up of control device information	4
062013-001	Replacement of an existing Cast-On-Strap ("COS") on Line #4, installation of a new COS on Line #4, and installation of four new encapsulators on Line #4	5
042014-001	Installation of a 500 pound capacity electric dross melting pot to an existing control device, EP-123, for the recovery of solder dross.	6

Construction Permit Revisions/Notes:

- 1.) Construction Permit 032006-008, Special Condition 1, states that the conditions of this permit supersede all special conditions found in previously issued construction permits (Permit Numbers 0284-011, 0885-008, 0590-013, 1090-008, 0791-002, 1292-001, 1193-001, 1294-012, 0495-017, 0196-014, 0896-020, 092000-004, 052001-019, 092000-004A, 112003-012 and 122004-010), therefore the special conditions contained in these permits were not included in the operating permit.
- 2.) Construction Permit 032006-008, Special Condition 2A contained "one time" requirements. The permittee has fulfilled the requirements of these special conditions therefore they were not included in the operating permit.
- 3.) The conditions Permit 122008-008A supersede Special Condition 3.B of Construction Permit 032006-008.
- 4.) Construction Permit 032006-008A, Special Condition 1 supersedes Special Conditions 4 and 5 of Construction Permit No. 032006-008.
- 5.) Construction Permit 062013-001, Special Condition 1 supersedes Special Condition 2.A of Construction Permit 122008-008.
- 6.) Special conditions from this construction permit are located in Permit Condition 4.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart KK, *Standards of Performance for Lead-Acid Battery Manufacturing Plants* applies to this facility (See Permit Condition 5, and unit applicability in Attachment D).

Maximum Available Control Technology (MACT) Applicability

40 CFR Part 63 Subpart P, National *Emission Standards for Hazardous Air Pollutants for Lead Acid Battery Manufacturing Area Sources* applies to this facility (See Permit Condition 5).

Other Regulatory Determinations

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

40 CFR Part 60 Subpart KK restricts opacity to zero percent from all emission units except those units defined as Lead Reclamation Units (See Attachment D) which are restricted to opacity of not more than five percent. Since 10 CSR 10-6.220(1)(H) exempts emission sources subject to a standard under 40 CFR Part 60, this rule was not included in the operating permit.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

10 CSR 10-6.400(1)(B)15 exempts any particulate matter emission unit that is subject to a federally enforceable requirement to install, operate, and maintain a particulate matter control device system that controls at least ninety percent (90%) of particulate matter emissions. All units with the potential to emit particulate emissions above 0.5 lbs/hr at this facility are either required to maintain emission control that would achieve at least 90% which meets the exemption level. (See Attachment C)

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	34.85
HAP	2.27
NO _x	54.08
PM ₁₀	9.05
PM _{2.5}	N/D
SO _x	0.30
VOC	179.12

¹Facility Potential to Emit from Construction Permit 042014-001.
 VOC PTE will be limited to less than 100 tpy per Plantwide Permit Condition PW001, which will reduce the overall PTE of the facility from that displayed in the table above.
 N/D = Not Determined

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

On May 19, 2015, the Air Pollution Control Program received four comments from Mr. Bob Cheever of the U.S. EPA, Region 7. The comments are addressed in the order in which they appear within the letter(s).

Comment #1:

Permit Condition 5 incorporates the applicable requirements from 40 CFR part 60, Subpart KK; *Standards of Performance for Lead-Acid Battery Manufacturing Plants* and from 40 CFR part 63, Subpart PPPPPP; *National Emission Standards for Hazardous Air Pollutants for Lead-Acid Battery Manufacturing Are Sources*. Permit Condition includes six (6) specific numeric lead emission limitations, however, Permit Condition 5 does not include any monitoring or record keeping that appears to verify compliance with these emission limitations. Permit Condition 5 does require the permittee to install, maintain and operate a pressure drop monitoring device to measure the differential pressure drop across specific control devices, however, there is nothing in this operating permit that appears to equate pressure drop to lead emissions. 40 CFR Part 60, Subpart KK required the permittee to perform initial performance tests to determine the pressure drop which verified the equipment/process being control by a particular air pollution control device. EPA recommends that MDNR include these pressure drop to lead emission validations in the operating permit Statement of Basis and reference the information in Permit Condition 5.

APCP Response

As the comment states:” 40 CFR Part 60, Subpart KK required the permittee to perform initial performance tests to determine the pressure drop which verified the equipment/process being control by a particular air pollution control device.”, meaning that the NSPS requires the permittee to maintain the control device in proper working order and under the same specifications as it was performing during the compliance demonstration. As such, there is no direct relationship between pressure drop (an indicator of proper performance as tested) and the actual emissions, other than the emission unit remains in compliance with the standard, as with any parametric monitoring protocol.

Comment #2:

All of the permit conditions in this draft operating permit require the permittee to report deviations from monitoring, record keeping and reporting requirements to be submitted semiannually in the semi-annual monitoring report and annual compliance certification as required by **Section IV** of this permit.

However, the requirements for semi-annual monitoring report and annual compliance certification are detailed in **Section V**. EPA recommends MDNR correct all of the permit conditions.

APCP Response

The draft was modified to reflect the comment.

Comment #3:

Operational Requirement 1.) in **Permit Condition 2** requires the permittee to control the lead and PM10 emissions from the following equipment using baghouses, cartridge filters and HEPA

filters as specified in Table 1 (See Attachment C). However, there is no “following equipment” in Permit Condition 2. EPA recommends MDNR clarify the intentions of operational requirement 1.

APCP Response

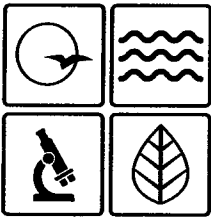
Permit Condition #2 was edited to clarify that the equipment listed in Table 1 of Attachment C was to be controlled by the controlled devices as specified.

Comment #4:

Requirement 1) b) in 10 CSR 10-6.065(5)(C)5; Off Permit Changes, in Section V, does not match the requirement language in the current Missouri state regulations. This discrepancy has resulted in a recent change to the wording for inclusion in the Intermediate State Permit to Operate and EPA recommends using the latest modified version of Off Permit Change language.

APCP Response

The draft was modified to reflect the comment.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

AUG 02 2017

Mr. Heath Albers
EnerSys Energy Products, Inc.
617 North Ridgeview Drive
Warrensburg, MO 64093-9301

Re: EnerSys Energy Products, Inc., 101-0023
Permit Number: OP2017-057

Dear Mr. Albers:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

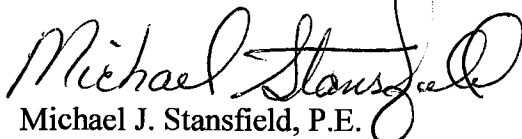
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM


Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:dbj

Enclosures

c: PAMS File: 2013-08-024

