MISSOURI DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 0 9 2 0 1 8 - 0 0 4
Project Number: 2018-05-035
Installation Number: 101-0023

Parent Company Address: 617 N. Ridgeview Drive, Warrensburg, MO 64093
Installation Name: EnerSys Energy Products, Inc.
Installation Address: 617 N. Ridgeview Drive, Warrensburg, MO 64093
Location Information: Johnson County, S19, T46N, R25W

Application for Authority to Construct was made for:
The installation of a high-speed battery assembly line (HSL 8). This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

☐ Standard Conditions (on reverse) are applicable to this permit.
☐ Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

SEP 1 7 2018
Effective Date
STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Enforcement and Compliance Section of the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Enforcement and Compliance Section of the Department’s Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department’s regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department’s personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
http://dnr.mo.gov/regions/
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. “Conditions required by permitting authority.”

Enersys Energy Products, Inc.
Johnson County, S19, T46N, R25W

1. Control Device Requirement-Baghouses/High Efficiency Particulate Air Filters (HEPA Filters)
   A. Enersys Energy Products, Inc. shall control emissions from the two cast-on-strap stations and the six encapsulators (EP-123) using a baghouse followed by a HEPA filter as specified in the permit application.

   B. The baghouse and HEPA filter shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse and HEPA filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control devices. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.

   C. Replacement filters for the baghouse and HEPA filter shall be kept on hand at all times. 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).

   D. Enersys Energy Products, Inc. shall monitor and record the operating pressure drop across the baghouses 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.

   E. Enersys Energy Products, Inc. shall maintain a copy of the baghouse manufacturer's performance warranty on site.

   F. Enersys Energy Products, Inc. shall maintain an operating and maintenance log for the baghouses which shall include the following:
      1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
      2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

2. Emission Limits
   A. Enersys Energy Products, Inc. shall emit less than 0.6 tons of lead from the entire installation in any consecutive 12-month period.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

B. For compliance with Special Condition 2.A., EnerSys Energy Products, Inc. shall maintain an accurate record of lead emitted into the atmosphere from the entire installation. Attachment A, or equivalent forms, including electronic forms, shall be used for this purpose.

3. Record Keeping and Reporting Requirements
A. EnerSys Energy Products, Inc. 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 SDS for all materials used.

B. EnerSys Energy Products, Inc. shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by e-mail at AirComplianceReporting@dnr.mo.gov, no later than 10 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.
Installation Address:  
EnerSys Energy Products, Inc.  
617 N. Ridgeview Drive  
Warrensburg, MO 64093

Parent Company:  
EnerSys Energy Products, Inc.  
617 N. Ridgeview Drive  
Warrensburg, MO 64093

Johnson County  
S19, T46N, R25W

REVIEW SUMMARY

• EnerSys Energy Products, Inc. has applied for authority to install high speed battery assembly line no. 8 (HSL 8) in its existing installation.

• The application was deemed complete on May 17, 2018.

• HAP emissions are expected from the proposed equipment. The HAP of concern from this process is lead.

• 40 CFR 60, Subpart KK, Standards of Performance for Lead-Acid Battery Manufacturing Plants, of the NSPS applies to the proposed equipment, which is a three-process operation facility as defined in this subpart.

• 40 CFR 63, Subpart PPPPPP, National Emission Standards for Hazardous Air Pollutants for Lead Acid Battery Manufacturing Area Sources, of the MACT applies to the proposed equipment.

• None of the NESHAPs apply to this installation (40 CFR Part 61).

• A baghouse followed by a HEPA filter is being used to control the particulate and lead emissions from the proposed equipment.

• This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of all pollutants are below de minimis levels.

• This installation is located in Johnson County, an unclassifiable/attainment area for all criteria pollutants.
• Previous permits issued to this installation did not consider it as a named installation. However, this facility is subject to NSPS Subpart KK. According to 10 CSR 10-6.020(3)(B), Table 2, Category 27, a named source includes "Any other stationary source category which, as of August 7, 1980, is being regulated under section 111 or 112 of the ACT". For NSPS, the date that the facility is being regulated by NSPS is the date of proposal. Subpart KK was proposed in January 14, 1980, although the rule was not finalized until 1982. Therefore, this installation is a named installation under Category 27. For Category 27, the major source level is 250 tons per year but fugitive emissions are counted toward major source applicability.

• Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

• Testing is not required as a part of the permit; however, 40 CFR 60, Subpart KK, requires testing for the lead emissions.

• A modification request for your Intermediate Operating Permit is required for this installation within 90 days of equipment startup.

• Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

EnerSys Energy Products, Inc. manufactures specialty lead-acid batteries for various commercial and industrial applications. The installation consists of two plants (Plants 1 and 2) located at the same site in an industrial part on the east side of Warrensburg, MO. Some of the lead oxide used at the installation is manufactured onsite while the remainder is purchased.

The installation was considered a major source for lead for construction permits before 2005. However, in 2005, Permit No. 032006-008 was issued in which the installation-wide lead emissions were limited to under the de minimis level of 0.6 tpy, making this installation a minor source. The installation-wide limit was kept until the issuance of Permit No. 042014-001 in 2014. In this permit, the installation added an electric dross melting pot to an existing control device. The melting pot had potential emissions of 0.00001 tpy of lead, but the 0.6 tpy lead emissions limit was not reinstated, making the potential emissions of lead greater than de minimis levels but still less than major.

For this project, the installation may be permitted for another 0.6 tpy increase of lead. However, the facility asked to keep the installation-wide emission limit of 0.6 tpy for simplicity in permitting.

An Intermediate Operate Permit #OP2017-057 was issued in August of 2017. The following New Source Review permits have been issued to EnerSys Energy Products, Inc. from the Air Pollution Control Program.
Table 1: Permit History

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>0284-011A-018A</td>
<td>Lead acid battery plant</td>
</tr>
<tr>
<td>0885-008-009</td>
<td>Lead smelting furnace</td>
</tr>
<tr>
<td>0590-013</td>
<td>Central vacuum cleaner system, battery core drying, melting pot and filters</td>
</tr>
<tr>
<td>1090-008</td>
<td>New continuous grid casting process</td>
</tr>
<tr>
<td>0791-002</td>
<td>Lead oxide transfer from two storage silos and mixing room</td>
</tr>
<tr>
<td>1292-001</td>
<td>Replacement of electric melting pot (lead melting pot)</td>
</tr>
<tr>
<td>1193-001</td>
<td>Modify plate perforation lube system from kerosene to a &quot;vanishing oil&quot;</td>
</tr>
<tr>
<td>1294-012</td>
<td>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</td>
</tr>
<tr>
<td>0495-017</td>
<td>New drying oven</td>
</tr>
<tr>
<td>0196-014</td>
<td>Installation of additional equipment in facility permitted by 1294-012</td>
</tr>
<tr>
<td>0896-020</td>
<td>Transfer of existing natural gas fired COS from Plant 1 to Plant 2</td>
</tr>
<tr>
<td>092000-004</td>
<td>New lead acid battery manufacturing line</td>
</tr>
<tr>
<td>052001-019</td>
<td>Temporary permit for testing a COS machine</td>
</tr>
<tr>
<td>092000-004A</td>
<td>Modification of performance testing requirements</td>
</tr>
<tr>
<td>112003-012</td>
<td>New lead oxide manufacturing process line and replacement of an existing weight hopper within the existing paste mixing process</td>
</tr>
<tr>
<td>122004-010</td>
<td>Phase I of the Large VRLA Cell Assembly Line</td>
</tr>
<tr>
<td>032006-008</td>
<td>Phase II of the VRLA Cell Assembly Line</td>
</tr>
<tr>
<td>122008-008</td>
<td>Installation of new lead acid battery line</td>
</tr>
<tr>
<td>122008-008A</td>
<td>EP-37 burner replacement and moving Line #1 from one location to another</td>
</tr>
<tr>
<td>032006-008A</td>
<td>True-up of control device information</td>
</tr>
<tr>
<td>062013-001</td>
<td>Replacement of an existing COS on Line #4, installation of a new COS on Line #4, and installation of four new encapsulators on Line #4</td>
</tr>
<tr>
<td>032006-008A</td>
<td>Correct configuration of control devices</td>
</tr>
<tr>
<td>042014-001</td>
<td>Installation of a new electric dross melting pot</td>
</tr>
</tbody>
</table>

PROJECT DESCRIPTION

EnerSys Energy Products, Inc. proposes to add a new high speed battery assembly line (HSL 8) to replace two existing battery assembly lines, line 1 and line 5. HSL 8 will involve 78 robots and be significantly more automated than lines 1 or 5. The primary benefit of HSL 8 is improved efficiency from increased automation. Additionally, HSL 8 will have a higher production capacity, the ability to produce additional battery sizes, require less labor, and will lead to improved industrial hygiene.

The existing Line 1 consists of four encapsulators and one cast-on-strap (COS) station and the existing Line 5 contains six encapsulators and one COS station. HSL 8 will include two new COS stations and six new encapsulators. Each COS station will include its own electrically-heated lead melting pot. The two existing assembly lines (Line 1 and Line 5) will be permanently shut down before construction of HSL 8.

HSL 8 has a higher production capacity than Lines 1 and Line 5 as it will be capable of operating more quickly and of producing additional battery sizes than Line 1 and Line 5. The maximum hourly processing rate will increase from 2.35 tph each for Lines 1 and 5 (a total of 4.7 tph) to approximately 10.3 tpy for Line 8, based on the maximum mass of dry lead in any battery size being assembled.
While the short-term production capacity will increase, the proposed project will not result in an annual production capacity increase for the installation. Currently, the bottleneck at the installation is the lead oxide mills. The facility operates three oxide mills, each with a production capacity of 1.25 tph. The number of batteries that can be produced depends on the amount of lead oxide that can be produced in the oxide mills. Since the lead oxide mills are not being modified, the proposed project will not result in an increase in processing rate of any equipment upstream or downstream of HSL 8 or lead to any extra truck traffic.

HSL 8 will be installed inside its own enclosed room within the building. Various vacuum pickup points and ventilation hoses/ducts will be installed to draw air to the existing baghouse and HEPA filter (EP-123). The lead melt pots associated with the new COS stations will be electrically heated and therefore, will not result in combustion emissions.

EMISSIONS/CONTROLS EVALUATION

Emissions expected from this project are PM$_{2.5}$, PM$_{10}$, PM, and lead. The emission factors used in this analysis were obtained from EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Chapter 12.15, *Storage Battery Productions*, (1/95). Emissions from the Cast-On-Strap stations were calculated using the emission factor for three-process operation (ssc 3-04-005-09). According to AP-42, the three-process operation emission factors include emissions from a cast on strap line and a central vacuum system. Emissions from the encapsulator were calculated using the emission factor for paste mixing (ssc 3-04-005-07) which is a similar process. In AP-42, the emission factors were given as a range. The highest emission factors were used in the calculations.

The baghouse and HEPA filter were given an overall control efficiency of 99.99% for particulates and lead. The default baghouse efficiency used by the Missouri Air Pollution Control Program is 99.0% and the HEPA filter efficiency, according to EPA Air Pollution Control Technology Fact Sheet, is at least 99.97%. Combining the two efficiencies leads to an overall efficiency of 99.9997%, which is truncated to two significant digits.

The capture efficiency was assumed to be 100%. The equipment is housed in a room inside a bigger building. There are multiple pickup points on top of the equipment to pick up particulate and lead emissions. There are small openings on the sides of the enclosure but the overall area of these openings (65 ft$^2$) is much less than the surface area of the enclosure walls. According to the EPA Air Pollution Control Technology Fact Sheet, a permanent total enclosure should have an inward face velocity of 200 fpm through the natural draft openings. With 65 ft$^2$ of openings, 13,000 cfm of air flow is required. The overall flow through the baghouse and HEPA filter is 45,000 cfm which is much higher. Therefore, particulates and lead should not escape the enclosure.
The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit No. 042014-001. Existing actual emissions were taken from the installation’s 2017 EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year).

**Table 2: Emissions Summary (tpy)**

<table>
<thead>
<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>25.0</td>
<td>N/D</td>
<td>N/D</td>
<td>0.0438</td>
<td>N/A</td>
</tr>
<tr>
<td>PM₁₀₀</td>
<td>15.0</td>
<td>9.05</td>
<td>0.89</td>
<td>0.0438</td>
<td>N/A</td>
</tr>
<tr>
<td>PM₂₅</td>
<td>10.0</td>
<td>N/D</td>
<td>0.82</td>
<td>0.0438</td>
<td>N/A</td>
</tr>
<tr>
<td>SOₓ</td>
<td>40.0</td>
<td>0.30</td>
<td>0.36</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>NOₓ</td>
<td>40.0</td>
<td>54.08</td>
<td>4.41</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>*179.12</td>
<td>79.73</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>34.85</td>
<td>1.33</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>GHG (CO₂e)</td>
<td>N/A</td>
<td>N/D</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>GHG (mass)</td>
<td>N/A</td>
<td>N/D</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Lead</td>
<td>0.6</td>
<td>0.6</td>
<td>0.0098</td>
<td>0.008</td>
<td>&lt;0.6</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>2.27</td>
<td>N/D</td>
<td>0.008</td>
<td>N/A</td>
</tr>
</tbody>
</table>

N/A = Not Applicable; N/D = Not Determined

*The installation is limited to less than 100 tpy of VOC in its operating permit (OP2017-057). The listed existing potential emissions are from the construction permits.

**PERMIT RULE APPLICABILITY**

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.

**APPLICABLE REQUIREMENTS**

EnerSys Energy Products, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

**GENERAL REQUIREMENTS**

- *Operating Permits*, 10 CSR 10-6.065
• **Start-Up, Shutdown, and Malfunction Conditions, 10 CSR 10-6.050**

• **Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110**
  - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.

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

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

• **Restriction of Emission of Odors, 10 CSR 10-6.165**

**SPECIFIC REQUIREMENTS**

• **New Source Performance Regulations, 10 CSR 10-6.070**
  - Standards of Performance for Lead-Acid Battery Manufacturing Plants, 40 CFR Part 60, Subpart KK

• **MACT Regulations, 10 CSR 10-6.075**
  - National Emission Standards for Hazardous Air Pollutants for Lead Acid Battery Manufacturing Area Sources, 40 CFR Part 63, Subpart PPPPPP

**STAFF RECOMMENDATION**

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, **Construction Permits Required**, it is recommended that this permit be granted with special conditions.

**PERMIT DOCUMENTS**

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated May 2, 2018, received May 17, 2018, designating EnerSys Energy Products, Inc. as the owner and operator of the installation.

Other relied upon documents:

- E-mail communication and attachments between the installation and the Missouri Air Pollution Control Program.
Attachment A - Lead Compliance Worksheet

EnerSys Energy Products Inc.
Johnson County, S19, T46N, R25W
Project Number: 2018-05-035
Installation ID Number: 101-0023
Permit Number: 092018-004

This sheet covers the month of _________.

<table>
<thead>
<tr>
<th>Date</th>
<th>Emission Point</th>
<th>Emission Point Description</th>
<th>Amount of Lead Processed (tons)</th>
<th>Pb Emission Factor(^1) (lb/ton)</th>
<th>Control Efficiency(^2) (%)</th>
<th>Pb Emissions(^3) (tons)</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>

Monthly Pb Emissions\(^4\) (tons):

12-Month Rolling Total Pb Emissions (tons) From Previous Month's Attachment A:

Monthly Pb Emissions (tons) from Previous Year's Attachment A:

12-Month Rolling Total Pb Emissions\(^5\) (tons):

\(^1\) Obtained from either AP-42 or stack testing.

\(^2\) As listed within the respective Air Pollution Control Program issued construction permit.

\(^3\) Pb Emissions (tons) = Amount of Lead Processed (tons) \times Pb Emission Factor (lb/ton) \times (1 - Control Efficiency (%)/100) \times 0.0005 (ton/lb)

\(^4\) The sum of each emission point's Pb Emissions (tons).

\(^5\) 12-Month Rolling Total Pb Emissions (tons) = 12-Month Rolling Total Pb Emissions (tons) from previous month's Attachment A - Monthly Pb Emissions (tons) from previous year's Attachment A + Monthly Pb Emissions (tons). A total of less than 0.6 tpy indicates compliance.
APPENDIX A

Abbreviations and Acronyms

% ............ percent
°F .......... degrees Fahrenheit
acfm .......... actual cubic feet per minute
BACT ........ Best Available Control Technology
BMPs .......... Best Management Practices
Btu .......... British thermal unit
CAM ...... Compliance Assurance Monitoring
CAS .......... Chemical Abstracts Service
CEMS ...... Continuous Emission Monitor System
CFR .......... Code of Federal Regulations
CO .......... carbon monoxide
CO₂ .......... carbon dioxide
CO₂e ........ carbon dioxide equivalent
COMS ...... Continuous Opacity Monitoring System
CSR .......... Code of State Regulations
dscf .......... dry standard cubic feet
EIQ.......... Emission Inventory Questionnaire
EP .......... Emission Point
EPA ......... Environmental Protection Agency
EU .......... Emission Unit
fps .......... feet per second
ft .......... feet
GACT ...... Generally Available Control Technology
GHG ........ Greenhouse Gas
gpm .......... gallons per minute
gr .......... grains
GWP ........ Global Warming Potential
HAP ........ Hazardous Air Pollutant
hr .......... hour
hp .......... horsepower
lb .......... pound
lbs/hr ........ pounds per hour
MACT ...... Maximum Achievable Control Technology
µg/m³ ...... micrograms per cubic meter
m/s .......... meters per second
Mgal ......... 1,000 gallons
MW .......... megawatt
MHDR ...... maximum hourly design rate
MMBtu .... Million British thermal units
MMCF ...... million cubic feet
MSDS ...... Material Safety Data Sheet
NAAQS .... National Ambient Air Quality Standards
NESHAPs National Emissions Standards for Hazardous Air Pollutants
NOx .......... nitrogen oxides
NSPS ....... New Source Performance Standards
NSR .......... New Source Review
PM .......... particulate matter
PM₂.₅ .... particulate matter less than 2.5 microns in aerodynamic diameter
PM₁₀ .... particulate matter less than 10 microns in aerodynamic diameter
ppm .......... parts per million
PSD .......... Prevention of Significant Deterioration
PTE .......... potential to emit
RACT ...... Reasonable Available Control Technology
RAL ........ Risk Assessment Level
SCC .......... Source Classification Code
scfm .......... standard cubic feet per minute
SDS .......... Safety Data Sheet
SIC .......... Standard Industrial Classification
SIP .......... State Implementation Plan
SMAL ....... Screening Model Action Levels
SOₓ .......... sulfur oxides
SO₂ .......... sulfur dioxide
SSM .......... Startup, Shutdown & Malfunction
tph .......... tons per hour
tpy .......... tons per year
VMT .......... vehicle miles traveled
VOC .......... Volatile Organic Compound
SEP 17 2018

Mr. Mark Moe  
EHS Manager  
Enersys Energy Products, Inc.  
617 N. Ridgeview Drive  
Warrensburg, MO 64093

RE: New Source Review Permit - Project Number: 2018-05-035

Dear Mr. Moe:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

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 the following website: http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.
If you have any questions regarding this permit, please do not hesitate to contact Chia-Wei Young, at the Department of Natural Resources’ Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

Enclosures

c: Kansas City Regional Office
   PAMS File: 2018-05-035

Permit Number: 092018-004
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