AB
8-19-13

STATE OF MISSOURI

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

AUG 19 2013

Mr. Peter Josendale
Exide Technologies
P.O. Box 159
25102 Exide Drive
Forest City, MO 64451

RE: Fugitive Dust Standard Operating Procedures Manual, Revised December 2012
Exide Technologies Canon Hollow Recycling
Facility ID: 087-0001

Dear Mr. Josendale:

The Missouri Department of Natural Resources' Air Pollution Control Program received and reviewed the above referenced *Fugitive Dust Standard Operating Procedures Manual*, as well as the revised drawing of the three parking areas, as requested, for the Exide Technologies Canon Hollow Recycling facility. The Manual was prepared and submitted in accordance with 40 CFR 63, Subpart X – "*National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting.*"

The *Fugitive Dust Standard Operating Procedures Manual* as it was submitted and with the revisions you submitted by e-mail, fulfills the requirements of Subpart X. With this letter, the Air Pollution Control Program hereby accepts the *Fugitive Dust Standard Operating Procedures Manual*. Please be aware that future modifications to this document must be submitted to the Air Pollution Control Program for review and approval.

Thank you for your attention to this matter. If you have any questions, please contact me at the above address, or by telephone at (573) 751-4817. You may also contact me by e-mail at Amanda.Brischle@dnr.mo.gov.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Amanda Brischle

Amanda Brischle
Environmental Specialist

AB:vs

c: Mr. Michael Cunningham, Kansas City Regional Office
Mr. Joe Winkelmann, APCP Planning
Source file: 087-0001

EXIDE TECHNOLOGIES

Canon Hollow Plant
P. O. Box 159
25102 Exide Drive
Forest City, MO 64451

660.446.3321 phone
660.446.3324 fax

www.exide.com

4 January 2013

Air Pollution Control Program
Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102

RE: Exide Technologies Canon Hollow Recycling
NESHAP Subpart X - Standard Operating Procedure Manuals

Dear Air Pollution Control Program,

In accordance with 40 CFR 63.549(b) and 63.550(b), Exide Technologies (Exide) submits the attached Standard Operating Procedures Manuals (SOP's) as required by 40 CFR 63.545(a) and 63.548(a) for the Missouri Department of Natural Resources review and approval.

The enclosed SOP's are prospective in nature and were written to incorporate the revised NESHAP Subpart X requirements as well as the physical NESHAP upgrades planned for the installation by January 2014.

Exide intends to operate under its currently approved SOPs (reflecting the previous NESHAP Subpart X improvements and the current physical configuration of the facility) until the upgrades of the Facility are complete and in operation.

If you have any questions or concerns regarding these SOPs, please feel free to contact me directly at (660) 446-3321 ext. 11.

Sincerely,

Peter Josendale, CHMM
Environmental Health and Safety Manager
Exide Canon Hollow Recycling

Attachments

cc: F. Ganster

Standard Operating Procedures Manual
For
Fugitive Dust Sources

Revised December 2012

Prepared For
Exide Technologies
Canon Hollow Smelter
Revised December 2012

I. Plant Roadways and Parking Areas

All plant roadways and parking areas in the Canon Hollow Recycling Center are asphalt or concrete paved and bermed to control storm water runoff. The roadways and parking area are identified as being potential sources of fugitive emissions due to the volume of vehicular traffic both shipping and receiving materials and supplies to the Recycling Center. Particulate matter, which may contain lead, that is incidentally deposited on roadways may be reintrained into the atmosphere by vehicular traffic.

A. Control Measures

1. Fugitive dust emissions from plant roadways and parking area will be controlled by means of wet wash or vacuum cleaning. in accordance with the following schedule:

   All plant roadways subject to vehicle traffic will be cleaned at least twice a day between 7:00 am to 7:00 pm.

   (Attachment A) shows the location of the areas in the smelter that are cleaned by the sweeper.

2. A 5-mile per hour speed limit is posted and enforced on all plant roadways. Speed bumps are also installed on the main roadway.

3. The road sweepers are operated and maintained in accordance with manufacturer's specifications. A daily Maintenance and Operation Log is completed by the operator on each shift and is maintained electronically at the facility.

These procedures are followed on a daily basis, except on days when precipitation, in the form of rain, snow or ice, makes cleaning unnecessary or when sand or similar material has been spread on plant roadways to provide traction on ice or snow. Documentation of the daily sweeping is recorded on the Sweeper Operational Log (see Attachment B).

II Plant Buildings

A. General

All the process and containment buildings at Canon Hollow that contain fugitive emissions sources listed in 40 CFR 63.544(a) (1) through (5) are fully enclosed will be under negative pressure. These buildings are a potential source of fugitive lead emissions. Vehicles leaving the buildings are also a potential source of fugitive emissions.

1. Control Measures:

a. All buildings required by 40 CFR 63.544 to be totally enclosed will be under negative pressure maintained at a pressure differential of 0.013 mm Hg or 0.007 in. of water.

b. Maintenance will perform a monthly inspection of all total enclosure buildings for cracks, gaps, corrosion or other deterioration that could lead to lead bearing material being released. Any findings will be fixed with in one week.

c. All vehicles leaving the totally enclosed negative pressure building will be washed at one of the designated exit doors prior to leaving the building. A record of all vehicle washes will be maintained.

d. Records for all total enclosure buildings will be maintained as follows:

1. Electronic records of continuous PD monitoring on total enclosures.
2. Records of any time period when power was lost to continuous PD monitoring systems or when power was lost to air handling systems to total enclosures
3. Monthly inspection of total enclosure buildings for cracks, gaps, leaks that could cause emissions.
4. Records of all vehicle washes.
5. All records will be retained for 5 years.

B. Battery Breaking Area

Spent lead-acid batteries received at the facility are processed in a totally enclosed battery breaker unit. The batteries are cut and all materials are separated. The entire process is wet once the batteries are cut and products are wet. The following fugitive emission control measures are utilized at the Battery Breaking Area.

1. Control Measures

a. Lead material exiting the battery breaker is placed directly into the Containment Building, which is designed and operated in accordance with the requirements outlines in 40 CFR 265.1101

b. The battery breaking area itself is totally enclosed and under negative pressure.

C. Furnace Area

There is one blast furnace located at the Canon Hollow Smelter which processes lead bearing materials for lead reclamation. Along with the furnace, other potential sources of fugitive emissions are the furnace charging and tapping areas. The following fugitive emission control measures are utilized for these sources.

1. Control Measures

a. The furnace charging area is located adjacent to the Raw Material Storage and Handling Building and is totally enclosed within the same building structure, which meets the requirements outlined in 40 CFR 265.1101. Potential process fugitive emissions from the charging operation is controlled by an enclosed hood ventilated to a control device operated and maintained in accordance with the facility's standard operating procedures manual for baghouses.

b. The furnace area is totally enclosed and under negative pressure

c. Potential process fugitive emissions from lead and slag tapping are controlled by enclosed hoods ventilated to a control device operated and maintained in accordance with the facility's standard operating procedures manual for baghouses

D. Refining and Casting Area

Kettles used in the lead refining process receive molten lead directly from the furnace. Reagents are added to the lead to make particular lead alloys. Potential fugitive emissions are controlled by the following measures:

1. Control Measures

a. The lead refining area is located and operated in conjunction with the furnace. Potential fugitive emissions from refining operations

are controlled by enclosed hoods ventilated to a control device operated and maintained by the facility's standard operating procedures manual for baghouses.

b. The refining area is totally enclosed and under negative pressure.

E. Slag and Sludge Fixing Process Area

Blast furnace slag, water treatment plant sludge and SO2 scrubber sludge are fixed utilizing a rock crusher and a pug mill mixer. Potential fugitive emissions are controlled by the following measures:

1. Control Measures

    a. The slag and sludge fixing process area is totally enclosed and under negative pressure.

    b. A baghouse controls fugitive dust from the slag crusher and ancillary equipment.

Records of operation of the Slag Crusher baghouse will be recorded on the Slag Crusher Baghouse Process Control Log (Attachment G)

III. Accidental Releases

A. Control Measures

1. In the event of an accidental release clean up will be initiated within one hour after detection of any release greater than 10 pounds.

IV. Battery Storage

A. Control Measures

1. Battery storage areas are totally enclosed and under negative pressure.

V. Material Storage and Handling

Lead bearing materials are staged in the Raw Material Storage and Handling Buildings prior to being processed through the smelting furnace. Fugitive emissions are controlled by the following measures:

A. Control Measures

1. The raw materials storage and handling buildings are totally enclosed and under negative pressure.

2. All vehicles exiting the containment building must pass through a vehicle wash prior to exiting the building

3. Daily records of the vehicle washings are maintained on the Vehicle Wash Log.

Although the lead materials stored in this area are generally moist by their nature and not prone to dusting, wet suppression will be used if necessary. Because of this fact, Exide does not apply wet suppression regularly. If wet suppression is necessary, Exide will only apply enough liquid to control dusting. Daily records of any dust suppression activities are maintained on the Containment Building Fugitive Dust Log (Attachment F)

VI. Equipment Maintenance

Equipment maintenance is a potential source for fugitive emissions. Equipment moved out of a totally enclosed negative pressure building with out decontamination also presents a source of fugitive emissions.

A. Control Measures

1. Maintenance will be performed inside of the totally enclosed negative pressure buildings whenever practical.

2. Alternatively, maintenance may be performed inside a temporary enclosure that uses a vacuum system equipped with a filter rated by the manufacturer to achieve a capture efficiency of 99.97 percent for 0.3 micron particles or is routed to an existing control device permitted for this activity.

3. If equipment can not be worked on in the totally enclosed negative pressure buildings, the equipment will be decontaminated prior to being removed to the maintenance area for repair.

4. Mobile equipment will also be decontaminated prior to leaving the totally enclosed negative pressure buildings.

5. Maintenance equipment brought into the totally enclosed negative pressure buildings will be decontaminated prior to leaving the totally enclosed negative pressure buildings.

VII. Material Transportation

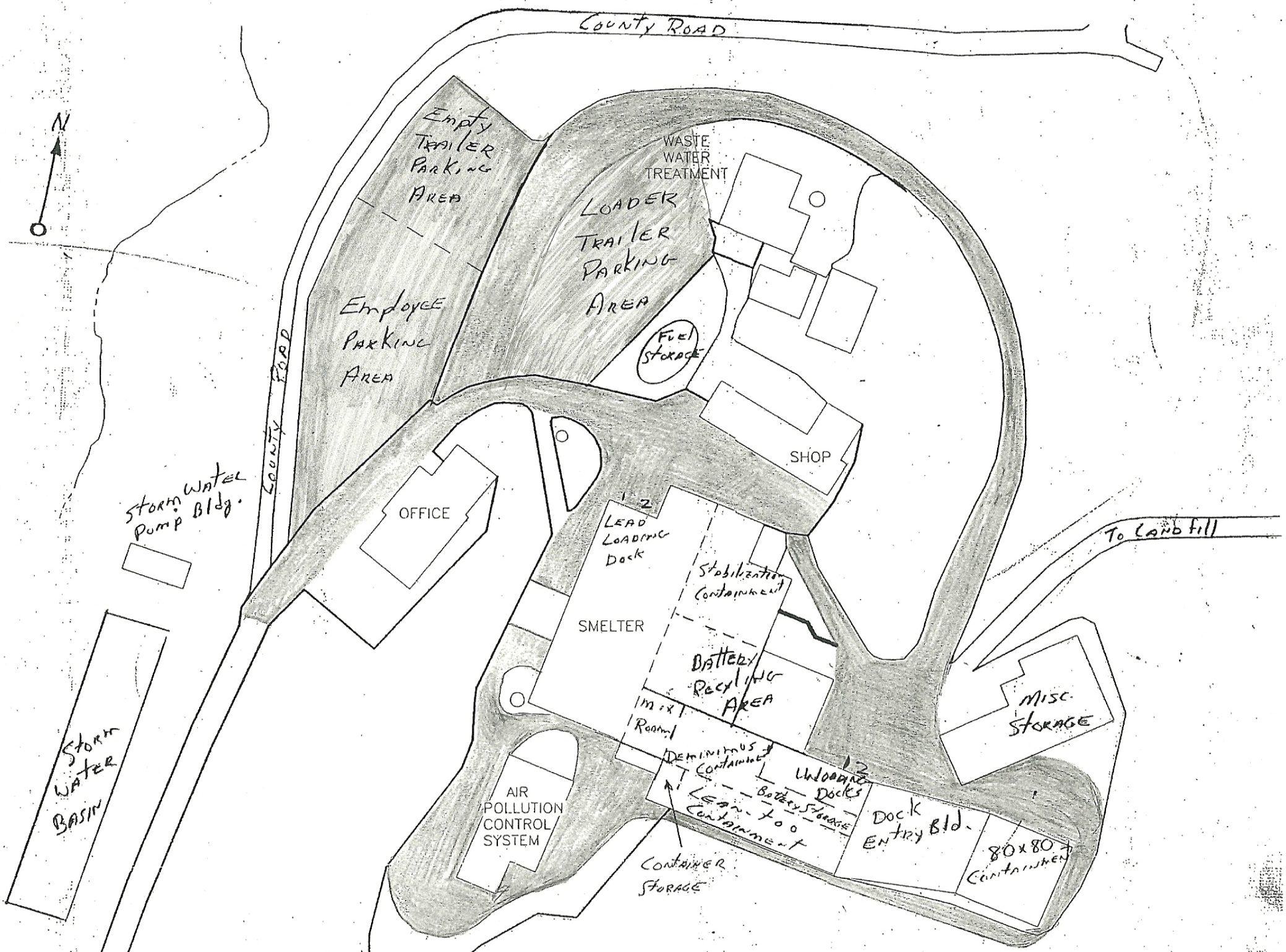
The transportation of lead-bearing dust can be a source of fugitive lead emissions. Potential fugitive emissions are controlled by the following measures:

1. All lead bearing dust will be collected and transported within closed conveyor systems or in sealed, leak-proof containers unless transport activities are contained within a total enclosure.

2. All lead-bearing materials for transportation outside of an enclosure must be contained and covered in a manor that prevents spillage or dust formation.

3. Intact batteries and lead ingot product are exempt from these regulations.

Attachment A


County Road
N
Empty Trailer Parking Area
Employee Parking Area
Loader Trailer Parking Area
WASTE WATER TREATMENT
Fuel Storage
SHOP
County Road
Storm Water Pump Bldg.
OFFICE
To Land fill
1 2
Lead Loading Dock
Stabilization Containment
SMELTER
Battery Recycling Area
Misc. Storage
Mix Room
Demin. Water Containment
1 2
Unloading Docks
Battery Storage
Lead-Too Containment
Dock Entry Bld.
80x80 Containment
AIR POLLUTION CONTROL SYSTEM
Container Storage
Storm Water Basin

Attachment B

Inspector _____

Inspector _____

Sweeper Operation

"A" Titled: S.O.P. Fugitive Dust Sources Sweeping Area.

Month of: _____

Date	First Run	Second Run	Inspector
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			

Note: Sweeping is performed at least twice daily on roadways indicated in attachment A. Sweeping is performed continuously, daily, to include two or more times around.

Attachment C

Mechanical Ventilation Measurements

Exide Corporation — Canon Hollow Plant

Date:

Equip. Used: Velocicalc Model #8355

Readings Taken By:

Furnace / Metal Trough					
Point #1		Point #5			
Point #2		Point #6		Slag Tap	
Point #3		Point #7		*Avg. Vel.*	
Point #4		Point #8		Metal Well	
	Avg. Vel.			*Avg. Vel.*	

Kettle Floor				
	Avg. Velocity			*Avg. Velocity*
Kettle #1			Dross Pot	
Kettle #2			Dross Pot	
Kettle #3			Dross Pot	
Kettle #4			Dross Pot	

Furnace Charge Hood							
Point #1		#4		#7		#10	
Point #2		#5		#8		#11	
Point #3		#6		#9		#12	
					Avg. Velocity		

Attachment D

SHIFT: B

DATE November 30, 2007 SHIFT SUPERVISOR Wilson, Jack

	EMPLOYEE	HOURS
CHARGE OPERATOR	RUSSELL . JEFF	12
FLUX OPERATOR		
BLAST FURNACE OPERATOR	MARKELY JOHN	12
SLAGPOT/ASST FURNACE OPERATOR	Schwang, Paul	12
KETTLE FLOOR OPERATOR	Sisk, Spencer	12
BAGHOUSE	Nelson, Roger	12
MISC	Wilmes,Mike	12
MISC		
ABSENTEES		
ABSENTEES		
TOTALS		70

BLAST FURNACE CHARGE NUMBER# 102

KETTLE #1:

#1 Tons out start 18

#2 Tons out end 26

#3 Pumped 83 tons to kettle 3

#4 Cast rough tons, Lot#

#5 Rough drossed hoppers(s)

TONS PRODUCED

75

Number of Charges 56 Number of Slag Pots 12

FURNACE CONDITIONS

TUYERES

EAST SLOTS 3	/3	B	1	/1	O	/	D
WEST SLOTS 2	/4	B	2	/	O	/	D

TOP TEMPERATURE - BEGINNING OF SHIFT: 845

DOWNTIME - CAUSE AND CORRECTIVE ACTION:

KETTLES

	STARTING TREATMENT	TEMPERATURE	ENDING TREATMENT	TEMPERATURE
KETTLE #2:	SB	1200	MTY	
KETTLE #3:	FILL		DE SN	1040
KETTLE #4:	MTY		MTY	

HOUSEKEEPING

Kettle Floor	Baghouse	Scrubber	Flues
Slag Tap Area * Yes	Floors * Yes	Floor * Yes	Afterburner Yes
Metal Wells Area * Yes	Bins MTY	Filter Press MTY	Elbow Yes
Floors * Yes	Office Building	Slurry Level 1/3	Water Cooled Flue Yes
Reagent Room * Yes	Indigenous Waste Removed Yes	Recycle Level 1/3	Cleanout Box Yes
Slag Dump * Yes			
Dross Bin Yes			
Ile Rims & Hoods Yes			

*WET Sweeping and Washing

Kettles Cast

Kettle Number	Lead Alloy	# of Blks
2	SOFT-1795	125

Attachment E

Exide Corporation n Hollow Plant
Hazardous Waste Inspection - Containment Building Unit and Roadways

Date														
Inspector														
Status	Sat.	Unsat.	Sat.	Unsat.	Sat.	Unsat.	Sat.	Unsat.	Sat.	Unsat.	Sat.	Unsat.	Sat.	Unsat.
Dock Entry Building (DEB) Daily:														
- No visible air emissions														
- No accumulation of liquids														
- Prevention of tracking of waste														
- Decon wash station operable														
Weekly:														
- Condition of floor of storage area														
- No stacking of waste (adjacent to wall) higher than concrete wall														
Comments														
80' x 80' Storage Area *Daily:*														
- No visible air emissions														
- No accumulation of liquids														
- Prevention of tracking of waste														
Weekly:														
- Condition of floor of storage area														
- No stacking of waste (adjacent to wall) higher than concrete wall														
Comments														
Roadways for Hazardous Waste and Raw Materials *Daily - Workday:*														
- General condition														
- Evidence of spillage														
Comments														

Attachment F

Inspector_____

Inspector_____

Containment Building Fugitive Dust Log

Document Any Containment Building Areas Wetted to Control Dust Emissions

_____ Month

_____ Year

Deb Room = NO. 1 Slag Floor = NO. 2

Day	Building(s)	Comments	Inspector
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
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30			
31			

Attachment G

SLAG CRUSHER BAGHOUSE DAILY/MONTHLY PROCESS CONTROL

DAILY

DAY	BLOWER AMPS	DIFFERENTIAL	CLEANING BLOWER (OK)	DUST REMOVED	INITIALS
Sunday					
Monday					
Tuesday					
Wednesday					
Thursday					
Friday					
Saturday					

COMMENTS: _____

_____

_____

MONTHLY (This section to be completed the 1st week of each Month)

Baghouse, Ducts & Hoods External Integrity _____

Baghouse Interior Integrity _____

Bags Secure _____

Fan wear, buildup & vibration _____

SIGNATURE: _____

COMMENTS: _____

_____

_____

Standard Operating Procedures Manual
For
Baghouses

Prepared For
Exide Technologies
Canon Hollow Smelter

Revised December 2012

December 2012

Exide Technologies
Canon Hollow Recycling Facility
Baghouses
Standard Operating Procedures Manual

1. Introduction

2. Air Quality Control Devices at Canon Hollow

3. Operations And Inspections

    A. Process and Process Fugitive Control Devices.
    B. Fugitive Control Devices

4. Baghouse Maintenance Program

5. Corrective Action Plan for Bag Leak Detection Alarms

1. Introduction

Pursuant to 40 CFR Part 63.548 – NESHAP for Secondary Lead Smelting, Monitoring requirements, owners and operators of secondary lead smelters shall prepare, and at all times operate according to a standard operating procedures manual that describes in detail procedures for inspection, maintenance, and bag leak detection and corrective action plans for all baghouses that are used to control process, process fugitive, or fugitive dust emissions from any source subject to the lead emissions standards in 63.543, 63.544, and 63.545, including those used to control emissions from building ventilation. This manual sets fourth the procedures used to operate, inspect, and maintain the baghouse at Exide Technologies Canon Hollow Recycling Facility.

The operations and maintenance program for air quality control devices at the Canon Hollow Recycling Facility is designed to ensure the efficient operation of these units in the removal of hazardous air pollutants.

This program also addresses equipment planned for installation by January 2014.

2. Air Quality Control Devices

A. Process Emissions
   West Baghouse – Controls particulate emissions from the blast furnace process and related lead and slag taps.
B. Hygiene Emissions
   East Baghouse – Controls particulate emission from refining kettles, blast furnace charge hood, blast furnace mix room, plus general ventilation.
C. Building Hygiene Emissions
   West Baghouse #2 - Controls particulate emission and provides negative pressure for the west side of the fully enclosed negative pressure buildings. To be installed by January 2014.
   North Baghouse - Controls particulate emission and provides negative pressure for the east side of the fully enclosed negative pressure buildings. To be installed by January 2014
D. Slag Crusher Baghouse – Controls particulate emissions from the slag crusher.

3. Operations And Inspections

To insure the proper operation of control devices, the bag house operators, shift supervisors and maintenance personnel are responsible for the daily inspections performed on the fabric filter baghouses and scrubber. The following section outlines the type of control device, the minimum inspections to be performed on the control device and documentation on the inspection checklists.

A. Process, Hygiene, and Slag Crusher Baghouses	Frequency to be performed
1. Daily monitoring of pressure drop across each baghouse cell	Daily
2. Visual inspection that dust is being removed from hoppers and conveyance system.	Weekly
3. Check compressed air supply for pulse-jet baghouses	Daily
4. Monitor cleaning cycle by manually running the cycle and observing the control panel and control device equipment to ensure proper opersation.	Weekly
4. Check bag cleaning mechanisms (shakers, isolation dampers, sonic horns)	Monthly
5. Check Bag tension on reverse air and shaker-type baghouses.	Monthly
6. Visual inspection of physical integrity of baghouse interior for leaks	Quarterly
7. Visual inspection of fans for wear, material buildup and corrosion.	Quarterly

A copy of the Baghouse Process Control Sheets for the process and Process Fugitive Control Devices are included in Attachment A & B.

In addition to the above manual checks on the operation of the process and hygiene baghouses, a continuous bag leak detection system will be operated at the outlet of each baghouse to monitor lead concentration.

4. Baghouse Maintenance Program

Corrective action will be taken immediately if deficiencies are noted during daily, weekly, monthly, or quarterly inspections. A Baghouse Maintenance Log sheet (Attachment D) will be completed to document maintenance and repairs made to the control device.

Note: Inspection and maintenance procedures require work to be performed on moving machinery and equipment, and also within the baghouses. It is a requirement to comply with the Occupational Safety and Health regulations and Exide's procedures governing equipment lock-out/ tag-out and confined space entry. It is mandatory for all employees to fulfill these requirements.

Some common baghouse problems and corrective measures are included in the following Troubleshooting Guide. The guide is not intended to be an exhaustive list of all possible problems which may occur. Should problems outside the scope of this guide be experienced, Exide will rely on its vast experience in the operation of air cleaning devices and the services of outside experts, to develop appropriate corrective action.

Trouble-Shooting Guide

Problem	Potential Cause	Remedy
Excessive pressure drop across baghouse or cell	Incorrect pressure readings	Check magnehelic lines Clean lines with compressed air if necessary Calibrate magnehelic Replace magnehelic
	Bag cleaning mechanism not operating properly. No air pressure	Check bag cleaning devices (shakers, horns, pulse air) Check feed line shut offs
	Cleaning cycle problems	Check cycle timers Increase duration of cycle
	Cell isolation dampers not working properly	Check mechanically Check air supply system
	Air supply system for cleaning mechanisms not operating properly.	Check air compressor Check electric solenoids Check, clean or replace tubing from solenoids to air diaphragm. Check, clean or replace air flappers. Check lock-out valves to ensure they are open.
	Improper bag tension	Isolate cell Correct bag tension Clean cell
	Dust not being removed from bags. Bags blinded.	Replace bags
	Dust conveyance system problems	Check Hoppers. Check rotary valves. Check screw conveyers.
Decreased pressure drop across baghouse or cell	Exhaust equipment problems	Check fan and motor
	Isolation equipment problems	Check dampers

		Check air supply
	Ductwork partially blocked	Check ductwork to control device. Clean blockage.
Visible emissions from stack	Bag Leaking	Isolate leaking cell Replace bags
	Bag clamps not sealed	Isolate cell. Check and tighten clamps
	Blinded Bags	Isolate cell Replace bags
	Joint or seal failure between clean/dirty air compartments	Isolate compartment Caulk of repair joint.
	Insufficient filter cake	Adjust cleaning cycle Precoat bags
Excessive Fan Vibration	Bearing damage	Check bearings Grease bearings Replace bearings
	Build-up on fen or excessive wear	Clean Fan Rebalance fan

5. Corrective Action Plan For Bag Leak Detection Alarms

Bag leak detection systems are installed on the exhaust outlets of the following control devices.

1. East Baghouse
2. West Baghouse
3. West Baghouse #2
4. North Baghouse
5. Slag Baghouse

These control devices are used to control process and process fugitive emissions from the smelter.

The bag leak detection systems will meet the following requirements:

1. Certified by the manufacturer of being capable of detecting particulate matter emissions at concentrations of 1.0 milligrams per actual cubic meter (0.00044 grains per actual cubic foot).
2. Provide output of relative particulate size.
3. Equipped with an alarm that will alarm when an increase in particulate over initial preset level is detected.
4. Installed and operated in a manner consistent with the guidance provided in " Office of Air Quality Planning and Standards (OAOPS) Fabric Filter Bag Leak Detection Guidance" (Guidance) EPA-454/R-98-015, September 1997.
5. Initial adjustment will consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time.
6. Following initial adjustment, no additional adjustment of the sensitivity, range, averaging period, alarm set points, or alarm delay will be made, except in accordance with the Guidance. In no case will the sensitivity be increased by more than 100 percent or decrease by more than 50 percent over a 365 day period unless such adjustment follows a complete baghouse inspection that demonstrates that the baghouse is in good operating condition.
7. For any negative pressure, induced air baghouse, and positive pressure baghouses that are discharged to the atmosphere through a stack, the bag leak detector will be installed downstream of the baghouse and upstream of any wet acid gas scrubber.

If an alarm occurs, an investigation will be completed and corrective action taken within 30 minutes of the alarm. Baghouse employees will document the time and cause of the alarm and all corrective actions taken in response to the alarm on the baghouse process control daily/weekly inspection sheet (Attachment A).

Corrective actions may include one or more of the following:

1. Inspecting the baghouse for air leaks, torn or deteriorated filter bags, or any other malfunctions that could cause or increase emissions.
2. Replacing defective bags, or otherwise repairing control device.
3. Sealing off defective bags, isolating defective baghouse cell, or sealing off a control device by routing air to other control devices.
4. Shutting down the process producing the particulate emissions
5. Inspect bag leak detection system

Operation & Inspection

	Bag Leak Detection Devices	Frequency to be Performed
1.	Response tests using a suitable dry powder to simulate a broken or leaking bag	Monthly
2.	Electronic drift check	Monthly
3.	Sensor inspection	Monthly
4.	*Instrument setup	Annually

The first three listed items are documented on the Baghouse Process Control monthly inspection sheet (Attachment B)

* Performed and documented by the Manufacturer or equivalent qualified individual.

From: (660) 446-3321
Peter Josendale
EXIDE TECHNOLOGIES
25102 Exide Drive

FOREST CITY, MO 64451

Origin ID: STJA

FedEx Express

J1220120920032S

Ship Date: 07JAN13
ActWgt: 0.3 LB
CAD: 5105509/INET3300

Delivery Address Bar Code

SHIP TO: (573) 751-4817 BILL SENDER

MDNR Air Pollution Control Program
1659 East Elm St

JEFFERSON CITY, MO 65101

Ref #
Invoice #
PO #
Dept #

TUE - 08 JAN A4
STANDARD OVERNIGHT

TRK# 0201 7944 5539 9059

NA JEFA

65101
MO-US
STL

51502/7813/AA44

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FOREST CITY, MO US 64451
660 446-3321

Delivered
Signed for by: D.HEINRICH

Actual delivery :
Tues 1/08/2013 9:55 am

MDNR Air Pollution Control Program
1659 East Elm St
JEFFERSON CITY, MO US 65101
573 751-4817

Travel History

Date/Time	Activity	Location
- 1/08/2013 - Tuesday		
9:55 am	Delivered	JEFFERSON CITY, MO
9:00 am	On FedEx vehicle for delivery	JEFFERSON CITY, MO
8:20 am	At local FedEx facility	JEFFERSON CITY, MO
5:19 am	Departed FedEx location	INDIANAPOLIS, IN
5:03 am	At destination sort facility	BERKELEY, MO
12:39 am	Arrived at FedEx location	INDIANAPOLIS, IN
- 1/07/2013 - Monday		
7:39 pm	Left FedEx origin facility	ST JOSEPH, MO
4:49 pm	Picked up	ST JOSEPH, MO
11:30 am	Shipment information sent to FedEx	

Local Scan Time

Shipment Facts

Tracking number	794455399059	**Service**	FedEx Standard Overnight
Weight	0.5 lbs	**Delivery attempts**	1
Delivered To	Receptionist/Front Desk	**Total pieces**	1
Total shipment weight	0.5 lbs / 0.2 kgs	**Terms**	Not Available
Packaging	FedEx Envelope	**Special handling section**	Deliver Weekday