

## Air Emission Source Construction Approval

**Source ID No.:** 1690035

**Effective Date:** Draft

**Source Name:** Exide Technologies

**SIC Code:** 3691; Storage Batteries

**NAICS Code:** 335911; Storage Battery Manufacturing

**Source Location:** 413 E. Berg Road  
Salina, Kansas 67401

**Mailing Address:** 413 E. Berg Road  
Salina, Kansas 67401

**Contact Person:** Justin Harness  
EHS Manager  
Phone: (785) 823-4029  
Email: [justin.harness@exide.com](mailto:justin.harness@exide.com)

This approval is issued pursuant to K.S.A. 65-3008 as amended.

### **I. Description of Activity Subject to Air Pollution Control Regulations**

Exide Technologies is proposing to install fourteen (14) hydroset curing ovens at their facility in Salina, Kansas. The ovens will be used as an alternate curing process for product specification purposes and will not result in an increase in the facility's production capacity. The installation of the ovens includes one (1) small natural gas-fired burner per oven. The ovens will be vented through Baghouse 4.

The potential emissions of nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), particulate matter (PM), and volatile organic compounds (VOC) were evaluated as part of this review process. This project is subject to the provisions of K.A.R. 28-19-300 (Construction permits and approvals; applicability) because the ovens are affected sources subject to 40 CFR Part 63, Subpart P – *National Emission Standards for Hazardous Air Pollutants for Lead Acid Battery Manufacturing Area Sources* (MACT 6P) and K.A.R. 28-19-720, New source performance standards, which adopts 40 CFR Part 60, Subpart KK – *Standards of Performance for Lead-Acid Battery Manufacturing Processing Plants* (NSPS KK).

### **II. Significant Applicable Air Regulations**

The ovens and baghouse as proposed, are subject to Kansas Administrative Regulations, relating to air pollution control. The following regulations were determined to be applicable to these sources:

- A. K.A.R. 28-19-650. Emissions opacity limits from any emission unit in Kansas.
- B. K.A.R. 28-19-720. New source performance standards, which adopts 40 CFR Part 60, Subpart KK – *Standards of Performance for Lead-Acid Battery Manufacturing Processing Plants* (NSPS KK).
- C. 40 CFR Part 63, Subpart P P P P P P – *National Emission Standards for Hazardous Air Pollutants for Lead Acid Battery Manufacturing Area Sources*.

**III. Air Emission Unit Technical Specifications**

The following equipment or equivalent is approved:

- A. Fourteen (14) hydroset curing ovens routed to existing Baghouse 4. Each oven contains a burner rated at 0.5 mmBtu/hour or smaller.

**IV. Emissions Estimates from Proposed Activity**

<b>Pollutant</b>	<b>Potential-to-emit<sup>1</sup> (lbs/ hr)</b>	<b>Potential-to-emit (lbs/24 hr)</b>	<b>Potential-to-emit (tons per year)</b>
NO <sub>x</sub>		16.47	3.006
SO <sub>x</sub>	0.0041		0.018
CO		13.84	2.525
PM	0.0522		0.228
VOC		0.91	0.165
Lead	5.012 x10 <sup>-5</sup>	1.203x10 <sup>-3</sup>	2.195 x10 <sup>-4</sup>

There will be no increase in potential lead emissions from Baghouse 4 from the proposed project beyond the emission estimate of 1.85 E -2 g/sec relied on for the August 18, 2014 construction permit.<sup>2</sup>

**V. Air Emission Limitations and Conditions**

- A. Opacity of visible emissions from the curing ovens is limited to 0% as specified in 40 CFR 60.372(a)(7).
- B. The owner or operator shall comply with the lead emission limitation of 0.000437 gr/dscf as specified in 40 CFR 60.372(a)(6).

**VI. Performance Testing**

- A. The stack emissions subject to NSPS require performance testing in accordance with 40 CFR 60.8(a). Performance testing is required to be completed within 60 days after achieving the maximum production rate, but no later than 180 days after the initial startup of the hydroset curing ovens.
- B. The owner or operator shall conduct the performance test in accordance with the test methods described in 40 CFR 60.374 or any other test method approved by KDHE.

<sup>1</sup> Potential-to-emit means the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on a capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable.

<sup>2</sup> Per EPA-452/F-03-025 Air Pollution Control Technology Fact Sheet “for a given combination of filter design and dust, the effluent particle concentration from a fabric filter is nearly constant... for this reason, fabric filters can be considered to be constant outlet devices...”

- C. The owner or operator shall submit a performance test protocol which includes a description of the test and applicable test methods to the KDHE Air Compliance and Enforcement Section at least 30 days prior to testing.
- D. A written report of the performance test results shall be submitted to KDHE within 30 days following the test.

**VII. Monitoring Requirements**

The following requirements apply to any emission source subject to MACT PPPPPP with emissions controlled by a fabric filter.

- A. The owner or operator shall perform semiannual inspections and maintenance of each fabric filter as specified in 40 CFR 63.11423(b)(2)(i)
- B. The owner or operator shall meet the monitoring requirements of one of the following:
  - 1. 40 CFR 63.11423(b)(2)(ii)
  - 2. 40 CFR 63.11423(b)(2)(iii)

**VIII. Notification**

- A. For all fourteen (14) ovens, the owner or operator must submit the applicable notifications as specified in 40 CFR 60.7(a).
- B. Notify the Air Program Field Staff at North Central District Office in Salina at (785) 827-9639 within 30 days of installing the curing ovens so that an evaluation can be conducted.

**IX. General Provisions**

- A. This document shall become void if the construction or modification has not commenced within 18 months of the effective date, or if the construction or modification is interrupted for a period of 18 months or longer.
- B. A construction permit or approval must be issued by KDHE prior to commencing any construction or modification of equipment or processes which results in potential-to-emit increases equal to or greater than the thresholds specified at K.A.R. 28-19-300.
- C. Upon presentation of credentials and other documents as may be required by law, representatives of the KDHE (including authorized contractors of the KDHE) shall be allowed to:
  - 1. enter upon the premises where a regulated facility or activity is located or conducted or where records must be kept under conditions of this document;
  - 2. have access to and copy, at reasonable times, any records that must be kept under conditions of this document;
  - 3. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this document; and

4. sample or monitor, at reasonable times, for the purposes of assuring compliance with this document or as otherwise authorized by the Secretary of the KDHE, any substances or parameters at any location.
- D. The emission unit or stationary source which is the subject of this document shall be operated in compliance with all applicable requirements of the Kansas Air Quality Act and the federal Clean Air Act.
- E. This document is subject to periodic review and amendment as deemed necessary to fulfill the intent and purpose of the Kansas Air Quality Statutes and Regulations.
- F. This document does not relieve the permittee of the obligation to obtain any approvals, permits, licenses, or documents of sanction which may be required by other federal, state, or local agencies.

**Permit Writer**

---

Amanda Spade  
Environmental Specialist  
Air Permitting Section

---

Date Signed

AKS:saw  
c: NCDO  
C-13557