

MEMORANDUM

DATE: September 16, 2013

TO: Richard D. Garrity, Ph.D.

FROM: Stephen Hathaway, P.E. **THRU:** Diana M. Lee, P.E.
Sterlin K. Woodard, P.E.

SUBJECT: FINAL Air Construction Permit
Johnson Controls Battery Group, Inc.
Lead Oxide Manufacturing Expansion Project
Permit No.: 0570001-031-AC

Attached is FINAL Air Construction Permit No. 0570001-031-AC for the expansion of the Lead Oxide Manufacturing facility at Johnson Controls Battery Group, Inc. (JCBGI), located at 10215 N 30th Street in Tampa. Johnson Controls manufactures automotive and marine batteries and is a synthetic minor source for both Particulate Matter and Lead.

The REVISED DRAFT AC Permit package, including the Intent to Issue, Public Notice of Intent to Issue, the Technical Evaluation and Preliminary Determination, and the REVISED DRAFT AC Permit, was sent to the applicant on August 26, 2013. The facility published the “Notice of Intent to Issue” in the Tampa Bay Times on August 31, 2013. No comments were received from the general public since the intent was published. In addition, no comments were received from the facility since the issuance of the REVISED DRAFT permit.

The lead and particulate matter emissions from this project are regulated under Rules 62-296.600, 62-296.601, 62-296.602, 62-296.605, and 62-296.712, F.A.C., Reasonably Available Control Technology (RACT) for Lead and Particulate Matter, 40 CFR 60 - Subpart KK, and 40 CFR 63 – Subpart PPPPPP.

Based upon our review, we recommend the issuance of the FINAL AC permit.

SRH: 0570001-031-AC

FINAL DETERMINATION

FOR

Johnson Controls Battery Group, Inc.

Hillsborough County

Air Construction Permit

Application Number

0570001-031-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

September 16, 2013

I. Summary

The Environmental Protection Commission of Hillsborough County mailed a public notice package on August 26, 2013 that included the Intent to Issue REVISED DRAFT Air Construction Permit No. 0570001-031-AC to Johnson Controls Battery Group, Inc., located at 10215 N 30th Street, Tampa, FL 33612. The AC Permit is for the expansion of the lead oxide manufacturing facility at Johnson Controls' Tampa manufacturing facility.

The "Notice of Intent to Issue Permit" was published on August 31, 2013 in the Tampa Bay Times.

II. Comments

No comments were received from the facility or the general public since the Notice of Intent was published.

III. Conclusion

The final action of the Environmental Protection Commission of Hillsborough County is to issue the FINAL AC permit.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Tracy Breeding
Plant Manager
Johnson Controls Battery Group, Inc.
10215 North 30th Street
Tampa, FL 33612

Dear Ms. Breeding:

Re: Hillsborough County - AP

Enclosed is Permit Number 0570001-031-AC for the expansion of the lead oxide manufacturing facility at Johnson Controls' Tampa plant. The expansion entails the addition of two new Sovema Mills, as well as a new lead pot, pellet casters, and pneumatic lead oxide material handling equipment. This project also entails the removal of the aging Hardinge Ball Mill and the construction of a 6,000 ft² building to house the new equipment.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Dr., Tampa, Florida 33619; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/SRH/srh

cc: Florida Department of Environmental Protection (e-mail)
Clifford Koenig, P.E., HDR Engineering, Inc.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business
on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with
the designated clerk, receipt of which is hereby acknowledged.

Clerk

Date

PERMITTEE:

Ms. Tracy Breeding
Plant Manager
Johnson Controls Battery Group, Inc.
10215 N. 30th St.
Tampa, FL 33612

PERMIT/CERTIFICATION

Permit No.: 0570001-031-AC
County: Hillsborough
Expiration Date: September 16, 2015
Project: Lead Oxide Manufacturing
Expansion Project

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

Project Description

This air construction permit allows Johnson Controls to construct a 6,000 ft² expansion of the Lead Oxide Manufacturing facility including a larger lead melting pot and heater, two new lead pellet casters, two new Sovema Mills, a new enclosed lead oxide truck receiving area, pneumatic transfer equipment, four new indoor lead oxide storage tanks for manufactured and received lead oxide, primary and secondary lead oxide sifters, and paste mix pre-hoppers. Some of the existing emissions sources will be removed as part of this project, such as the existing lead melting pot and heater, the Hardinge Ball Mill, and the two (2) existing lead oxide receiving silos. PM and Pb emissions will be controlled by six (6) new baghouses equipped with PTFE membranes and secondary HEPA filters. Based on the information provided by Johnson Controls, this project will increase the lead oxide production capacity of the facility from 5,300 lbs/hour to 8,450 lbs/hour. However, the maximum annual usage of 87,600 tons per year of lead oxide remains unchanged in this air construction permit.

As part of this project, Johnson Controls will be removing the existing Hardinge Mill and associated Hardinge Ball Mill Bearings Vent (EU Nos. 015 and 034) and installing two (2) new Sovema Mills. The new Sovema Mills will each have a production capacity of 3,025 pounds per hour of lead oxide. The lead oxide powder is mixed with sulfuric acid, water, and other additives in the paste mixers. The paste is then forced into the interstices of the expanded negative and pre-manufactured positive grids. The pasted grids are cut into plates and dried. Positive grids, which contain precious metals, are manufactured off-site and brought to the facility in rolls. The pasted plates are stacked and cured in the Chemset curing chambers at controlled temperature and humidity for several hours.

to convert more of the free lead in the plates to lead oxide, prior to assembly into battery elements.

In order to feed the two (2) new Sovema Mills, Johnson Controls will replace the existing lead pot and natural gas-fired lead pot heater (EU Nos. 043 and 044) with an 18-20 ton lead pot and 2.0 MMBtu/hr natural gas heater. The new continuous melting pot will have a capacity of 12,000 lbs/hr lead, which will feed one of three (3) pellet casters (two new and one existing). The pellet casters will cast 1" lead cylinders (pellets) that will be conveyed into an indoor storage silo prior to being fed into the Sovema Mills. Lead oxide produced in the mills will be directed to each mill's respective baghouse, and then pneumatically conveyed to any of the four (4) new 150,000 lb capacity lead oxide storage tanks located inside the building.

The two new Sovema Mills will have an emergency non-contact cooling water system that will spray water on the outside of the mill drum to ensure that the mills do not overheat (above approximately 293°F). The existing Sovema Mill No. 1 has an emergency cooling water system that sprays water on the material inside the drum. In addition, this expansion project includes installing primary and secondary lead oxide sifters to remove any oversize or foreign materials from the product. The primary lead oxide sifter will be located between the three (3) Sovema Mills and the four (4) new 150,000 lb capacity lead oxide storage tanks. The secondary sifter will be located between the new storage tanks and the two (2) new lead oxide pre-hoppers located above the existing paste mixing hoppers. The secondary sifter will provide redundant filtration in case there is a problem with the primary sifter or a lead oxide shipment contains off-spec or foreign materials. The transport of the lead oxide from the mills to the storage tanks to the sifters and pre-hoppers will be accomplished using all enclosed pneumatic systems.

PM and Pb emissions from each of the two (2) new Sovema Mills will be controlled by a dedicated 5,900 dscfm Sovema NF 13000 Baghouse with PTFE membrane-laminated aramid filter bags and secondary fiberglass HEPA filters. Emissions from the combined non-contact cooling water exhaust, strip caster, and pellet casters will be controlled by a common 25,000 acfm American Air Filter baghouse with oleophobic (fluoroalkane-based) proprietary filter material and a secondary fiberglass HEPA filter. Emissions from the four lead oxide storage tanks will be controlled by a 1,600 dscfm Cyclonaire baghouse with PTFE membrane-laminated polyester filter bags and a secondary fiberglass HEPA filter. Emissions from the primary and secondary lead oxide sifters will be controlled by a 2,850 dscfm Cyclonaire baghouse with PTFE membrane-laminated polyester filter bags and a secondary fiberglass HEPA filter. Finally, the two (2) new lead oxide pre-hoppers will be controlled by a 1,600 dscfm Cyclonaire baghouse with PTFE membrane-laminated polyester filter bags and a secondary fiberglass HEPA filter. All of the new baghouses will be equipped with continuous differential pressure transmitters, rather than the discrete alarm type, for improved compliance monitoring.

Also, as part of this project, Johnson Controls submitted a draft Fugitive Dust Control Plan (FDCP) to prevent, minimize, and/or eliminate fugitive Pb and PM emissions during the construction and demolition phases of the project. Johnson Controls is required to submit a final Fugitive Dust Control Plan to the EPC within 30 days prior to commencement of pre-demolition/construction activities. At a minimum, Johnson Controls should implement the work practices detailed in the

Fugitive Dust Control Plan dated July 15, 2013, during any pre-demolition, demolition, and construction operations. The ultimate responsibility for compliance with the plan rests upon Johnson Controls Battery Group, Inc.

Process Description

At the facility, lead ingots are melted and cast by a strip caster and expanded to make grids. Pasting machines force a paste of lead oxide powder, water, and sulfuric acid into the interstices of the expanded grids after which these are referred to as plates. Lead oxide powder may be made at the plant by charging lead cylinders (pellets) into three Sovema mills, which pulverizes the lead pellets and combines the lead with air to form lead oxide. Freshly made lead oxide can also be delivered to the facility by truck and stored on-site in one of four indoor storage tanks.

The pasted plates are flash dried, cut, stacked, and then placed on plate trucks. The plate trucks are placed in one of six Chemset curing chambers where the plates are cured in a controlled environment at controlled temperature and humidity. Cured plates are stacked into groups with stackers, where the positive and negative plates are arranged in the appropriate manner and the electrical insulators are inserted between the plates. The groups are loaded in one of the COS machines where molten lead is poured around the plate lugs to form a strap. The group of plates joined by a strap is called an element. The elements are assembled into battery cases. The straps are welded to each other to connect the elements. A cover is heat-sealed to the battery case. The batteries are then immersed in a dilute sulfuric acid solution. The batteries are connected to the corresponding pole of a direct current source. Central vacuum systems are used to cleanup workstations and attend to any lead oxide spills in the plant.

Below is a list of the Emission Units and the respective emission control equipment that will be in place once the proposed expansion/modifications are complete.

<u>Source Designation</u>	<u>EU ID</u>	<u>Regulated Pollutants</u>	<u>Control Equipment</u>	<u>Stack No.</u>
Dry/Wet Mixing Process for Pasting Lines No. 1 and No. 3 (includes 2 ovens)	017	PM, NO _x , CO, VOC, SO ₂ , Pb	11,134 DSCFM American Air Filter Model No. 12-168-2694 Baghouse	234
Pasting Line No. 3	022	PM, Pb, Opacity	11,957 DSCFM Ruemelin 4120 Baghouse	134B
Pasting Line No. 1	034	PM, Pb, Opacity	14,312 DSCFM Ruemelin 7,200 Baghouse followed by nine HEPA filters in series	134
Sovema Mill #1 Process Stack	042	PM, Pb, Opacity	3,600 DSCFM Sovema Model NF 8000 Baghouse with secondary HEPA filter	348

Central Vacuum System	005	PM, Pb, Opacity	2 Wheelabrator Model No. 1036PA108 Baghouses each followed by Scientific Dust Collector and 3,400 DSCFM combined discharge	340
3 Pellet Casters (2 new, 1 existing), Strip Caster (existing), and Sovema No. 2 and 3 Mills' Cooling Water Exhaust	053	PM, Pb, Opacity	22,564 DSCFM American Air Filter Millennium Size 12-336-5387 Baghouse with secondary HEPA filter	370
2.0 MMBtu/hr Sovema Lead Pot Heater	054	PM, NOx, CO, VOC, SO ₂ , Pb	No Control Equipment	371
Sovema Mill #2 Process Stack	055	PM, Pb, Opacity	5,900 DSCFM Sovema Model NF 13000 Baghouse with secondary HEPA filter	372
Sovema Mill #3 Process Stack	056	PM, Pb, Opacity	5,900 DSCFM Sovema Model NF 13000 Baghouse with secondary HEPA filter	374
Primary and Secondary PbO Sifters	057	PM, Pb, Opacity	2,850 DSCFM Cyclonaire baghouse with secondary HEPA filter	376
Four (4) PbO Storage Tanks	058	PM, Pb, Opacity	1,600 DSCFM Cyclonaire baghouse with secondary HEPA filter	377
Two (2) PbO Pre-hoppers	059	PM, Pb, Opacity	1,500 DSCFM Cyclonaire baghouse with secondary HEPA filter	378

The lead and particulate emissions from this project are regulated under Rules 62-296.600, 62-296.601, 62-296.602, 62-296.605, and 62-296.712, F.A.C., Reasonably Available Control Technology (RACT) for Lead and Particulate Matter, 40 CFR 60 - Subpart KK, and 40 CFR 63 – Subpart P. The project is located at 10215 30th Street, Tampa, Hillsborough County, FL 33612.

Location: 10215 30th Street, Tampa, Hillsborough County, FL 33612

UTM: 17-359.90 E and 3102.60 N

NEDS NO: 0570001

Emission Unit Nos.:

017	Wet/Dry Mix Process for Pasting Lines 1 and 3
022	Pasting Line No. 3
034	Pasting Line No. 1
042	Sovema Mill #1 Process Stack
053	Three (3) Pellet Casters (2 new, 1 existing), Strip Caster (existing), and Sovema No. 2 and 3 Mills' Cooling Water Exhaust (includes new Sovema Lead Pot)
054	2.0 MMBtu/hr Sovema Lead Pot Heater
055	Sovema Mill #2 Process Stack
056	Sovema Mill #3 Process Stack
057	Primary and Secondary PbO Sifters
058	Four (4) PbO Storage Tanks
059	Two (2) PbO Pre-hoppers
005	Central Vacuum System

References Permit Nos.: 0570001-030-AF, 027-AC/026-AF, 022-AC, 019-AC, and 015-AC

PERMITTEE:
Johnson Controls Battery Group, Inc.

Permit/Certification No.: 0570001-031-AC
Project: Expand Lead Oxide
Manufacturing Facility

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. As requested by the permittee, in order to limit the potential to emit, the total facility-wide potential emissions shall not exceed 89.1 tons per year of particulate matter and 2.6 tons per year of lead. [Rule 62-210.200(Potential-to-Emit), F.A.C. and Permit Application Received May 23, 2013]
5. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]
6. In order to comply with the emissions limits in Specific Condition No. 4, the following restrictions and terms shall apply: [Rule 62-4.070(3), 62-296.320(4)(c), F.A.C., and Permit Application Received May 23, 2013]
 - A) The emissions units are allowed to operate continuously (8,760 hrs/yr).
 - B) All dust and lead laden air from the emissions units listed on Page 3 and 4 of this permit shall be captured and vented through the corresponding control devices and/or stacks as stated on the same pages.
7. [RESERVED]

Casting Facility: One Sovema Lead Pot heater (EU054), one strip caster, three pellet casters, cooling water exhaust for Sovema Mills 2 and 3 (EU053); and one strip caster heater (EU036). (Note: The heaters are not considered a significant source of lead emissions. The strip caster shares a common stack with the three pellet casters and non-contact cooling water exhaust for Sovema Mills 2 and 3.)

8. The permittee shall not allow lead emissions to exceed the following:
 - A) 0.40 mg/dscm (0.000175 gr/dscf) and 0% opacity for each and every vent associated with the strip casting facility.

PERMITTEE:
Johnson Controls Battery Group, Inc.

Permit/Certification No.: 0570001-031-AC
Project: Expand Lead Oxide
Manufacturing Facility

SPECIFIC CONDITIONS:

B) <u>Source</u>	<u>Emissions Limitations</u>		
	<u>gr/dscf</u>	<u>lbs/hr</u>	<u>tpy</u>
One (1) Strip Caster	0.000175	0.014	0.059
Three (3) Pellet Casters and Non-contact Cooling Water Exhaust for Sovema Mills 2 and 3	0.000437	0.051	0.222
Totals (Combined Stack Emissions)		0.065	0.281

[Permitting Note: These hourly and annual emission limitations are based on the preliminary design estimates of 40% of the airflow coming from the strip caster, and 60% of the airflow coming from the pellet casters and cooling water exhaust.]

[40 CFR 60.372(a)(1), (6), (7), and 60.372(b), 40 CFR 63.11423, Rules 62-204.800 and 62-296.602(1)(a) and (f), F.A.C.; and Permit Application received May 23, 2013]

9. The permittee shall not allow particulate matter emissions to exceed the following:

<u>Source</u>	<u>Emissions Limitations</u>		
	<u>gr/dscf</u>	<u>lbs/hr</u>	<u>tpy</u>
One Strip Caster, Pellet Casters, and Cooling Water Exhaust for Sovema Mills 2 and 3	0.01	1.93	8.47
One (1) Strip Caster Heater	N/A	0.01	0.05

[Rules 62-296.712 and 62-4.070(3), F.A.C.; and Permit Application received May 23, 2013]

10. The Strip Caster heater and Sovema Lead Pot heater shall be fired only on natural gas at a maximum heat input rate of 1.6 MMBtu/hr and 2.0 MMBtu/hr, respectively. [Rule 62-4.070(3), F.A.C., Permit No. 0570001-022-AC, and Permit Application received May 23, 2013]

11. In order to ensure compliance with Specific Condition Nos. 8 and 9, the Strip Caster production is limited to no more than 21,900 tons of lead strip during any consecutive twelve (12) month period. In addition the lead pot and pellet casters shall be limited to 52,560 tons of lead melted/cast during any consecutive twelve (12) month period. [Permit Nos. 0570001-019-AC, -022-AC, Permit Application received May 23, 2013, and Rule 62-4.070(3), F.A.C.]

PERMITTEE:
Johnson Controls Battery Group, Inc.

Permit/Certification No.: 0570001-031-AC
Project: Expand Lead Oxide
Manufacturing Facility

SPECIFIC CONDITIONS:

Paste Mixing Facility: Four (4) PbO Storage Tanks (EU058), Primary and Secondary PbO Sifters (EU057), Two (2) PbO Pre-hoppers (EU059), Wet/Dry Mix Process for Line Nos. 1 and No. 3 (EU017), Pasting Line No. 1 (EU034), and Pasting Line No. 3 (EU022)

12. The permittee shall not allow lead emissions to exceed the following:

- A) 1.0 mg/dscm (0.000437 gr/dscf) and 0% opacity for each and every vent associated with the paste mixing facility.
- B) 0.000437 gr/dscf and 0% opacity for the paste mixing sources.
- C)

<u>Source</u>	<u>Emission Limitations</u>		
	<u>gr/dscf</u>	<u>lb/hr</u>	<u>tpy</u>
Four (4) PbO Storage Tanks	0.000437	0.006	0.026
Two (2) PbO Pre-hoppers	0.000437	0.006	0.025
Primary and Secondary PbO Sifters	0.000437	0.011	0.047
Pasting Line No. 1	0.000437	0.054	0.235
Wet/Dry Mixer Process for Pasting Line Nos. 1 and 3 (Including Oven 1 and 3)	0.000437	0.042	0.183
Pasting Line No. 3	0.000437	0.045	0.196

[40 CFR 60.372(a)(2) and (7), 40 CFR 63.11423, Rules 62-204.800 and 62-296.602(1)(b), F.A.C., Permit No. 0570001-022-AC, and Permit Application Received May 23, 2013]

13. The permittee shall not allow particulate matter emissions to exceed the following:

<u>Source</u>	<u>Emission Limitations</u>		
	<u>gr/dscf</u>	<u>lb/hr</u>	<u>tpy</u>
Four (4) PbO Storage Tanks	0.005	0.069	0.30
Two (2) PbO Pre-hoppers	0.005	0.064	0.28
Primary and Secondary PbO Sifters	0.005	0.122	0.53
Pasting Line No. 1	0.015	1.84	8.06
Wet/Dry Mixer Process for Pasting Line Nos. 1 and 3 (including Oven 1 and 3)	0.015	1.43	6.27
Pasting Line No. 3	0.015	1.54	6.73

[Permit Nos. 0570001-022-AC, Rules 62-296.712 and 62-4.070(3), F.A.C., and Permit Application received May 23, 2013]

14. The two ovens for Pasting Lines 1 and 3 shall be fired only on natural gas at a maximum heat input rate of 1.2 MMBtu/hr per oven. [Permit No. 0570001-022-AC and Rule 62-4.070(3), F.A.C.]

PERMITTEE:
Johnson Controls Battery Group, Inc.

Permit/Certification No.: 0570001-031-AC
Project: Expand Lead Oxide
Manufacturing Facility

SPECIFIC CONDITIONS:

Lead Oxide Manufacturing Facility: Sovema Mill No. 1 (EU042), Sovema Mill #2 (EU055), Sovema Mill #3 (EU056)

15. The permittee shall not allow lead emissions to exceed the following:

- A) The lead emissions from each individual Sovema Mill shall not exceed 0.0005 gr/dscf. [Rule 62-296.602(1)(d), F.A.C.]
- B) The lead emissions for the combined operation of all three mills shall not exceed 5.0 milligrams of lead per kilogram of lead feed (0.010 lb/ton), 0.041 lbs/hr, and 0.179 tons per 12-consecutive month period. [40 CFR 60.372(a)(4) and 40 CFR 63.11423]
- C) 0% opacity for any given instant for each of the Sovema Mills. [40 CFR 60.372(7) and Rule 62-296.602(1)(d), F.A.C.]

[Rule 62-296.602(1)(d), F.A.C.; Permit Nos. 0570001-015, 020-AC, -022-AC, -027-AC/-026-AF, and Permit Application received May 23, 2013, and Additional Information Received August 7, 2013]

16. The permittee shall not allow particulate matter emissions to exceed the following:

<u>Source</u>	<u>Emission Limitations</u>		
	<u>gr/dscf</u>	<u>lbs/hr</u>	<u>tpy</u>
Sovema Mill No. 1 (S/N 348)	0.015	0.46	2.03
Sovema Mill No. 2 (S/N 372)	0.01	0.51	2.22
Sovema Mill No. 3 (S/N 374)	0.01	0.51	2.22

[Rule 62-4-070(3) and 62-296.711(2)(b), F.A.C.; Permit Nos. 0570001-015, 020-AC, -022-AC, -027-AC/-026-AF, and Permit Application received May 23, 2013]

17. The permittee shall determine compliance with the lead standard (0.010 lbs/ton lead feed) in Specific Condition No. 15.A) as follows: [40 CFR 60.374(c)]

- A) The emission rate (E) from each lead oxide manufacturing facility shall be computed for each run using the following equation:

$$E = \left(\sum_{i=1}^M C_{Pbi} Q_{sdi} \right) / (PK)$$

Where: E = Emission rate of lead, mg/kg (lb/ton) of lead charged.

C_{Pbi} = Concentration of lead from emission point "i," mg/dscm (gr/dscf).

Q_{sdi} = Volumetric flow rate of effluent gas from emission point "i," dscm/hr

PERMITTEE:
Johnson Controls Battery Group, Inc.

Permit/Certification No.: 0570001-031-AC
Project: Expand Lead Oxide
Manufacturing Facility

SPECIFIC CONDITIONS:

(dscf/hr).

M = Number of emission points in the affected facility.

P = Lead feed rate to the facility, kg/hr (ton/hr).

K = Conversion factor, 1.0 mg/mg (7000 gr/lb).

B) Method 12 shall be used to determine the lead concentration (C_{Pb}) and the volumetric flow rate (Q_{sd}) of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 0.85 dscm (30 dscf).

C) The average lead feed rate (P) shall be determined for each run using the following equation:

$$P = N \cdot W / \theta$$

Where: N = Number of lead pigs (ingots) charged.

W = Average mass of a pig, kg (ton).

θ = Duration of run, hrs.

Other Lead Emitting Operations: Central Vacuum System (EU005)

18. The permittee shall not allow lead emissions to exceed the following:

A) 1.0 mg/dscm (0.000437 gr/dscf) and 0% opacity for the Central Vacuum System.

<u>Source</u>	<u>Emissions Limitations</u>		
	<u>gr/dscf</u>	<u>lbs/hr</u>	<u>tpy</u>
Central Vacuum System (Systems 1 and 2)	0.000437	0.013	0.056

[40 CFR 60.372(a)(6) and (7), 40 CFR 63.11423, Rules 62-204.800 and 62-296.602(1)(f), F.A.C.; and Permit Nos. 0570001-022-AC and -027-AC/026-AF]

19. The permittee shall not allow particulate matter emissions to exceed the following:

<u>Source</u>	<u>Emissions Limitations</u>		
	<u>gr/dscf</u>	<u>lbs/hr</u>	<u>tpy</u>
Central Vacuum System (Systems 1 and 2)	0.015	0.44	1.91

[Rules 62-296.712(2) and 62-4.070(3), F.A.C.; and Permit Nos. 0570001-015-AC, -019-AC, -022-AC, -027-AC/026-AF]

20. The Central Vacuum System shall be used to clean up incidental spills of lead oxide. No dry sweeping or use of blowers is allowed. [Permit Nos. 0570001-015-AC, -022-AC, -027-AC/026-AF, and Rule 62-4.070(3), F.A.C.]

PERMITTEE:
Johnson Controls Battery Group, Inc.

Permit/Certification No.: 0570001-031-AC
Project: Expand Lead Oxide
Manufacturing Facility

SPECIFIC CONDITIONS:

Emission Unit Process Rates:

21. Process rates for each specified operation shall not exceed the following: [Rule 62-4.070(3), F.A.C. and Permit Nos. 0570001-015, 019, 022, 027-AC/026-AF, and Permit Application received May 23, 2013]

<u>Source</u>	<u>E.U. ID #/ Stack#</u>	<u>Maximum Process Rate</u>
Casting Facility		
Strip Caster, Three (3) Pellet Casters, and Cooling Water Exhaust for Sovema Mills 2 and 3 (includes new Sovema Lead Pot)	053/370	5,000 lbs/hr and 21,900 tpy lead strip produced in Strip Caster 12,000 lbs/hr and 52,560 tpy lead melted/cast in Sovema Lead Pot / Three Pellet Casters
Strip Caster Heater	036/233	1.6 MMBtu/Hr.
Sovema Lead Pot Heater	054/371	2.0 MMBtu/hr
Paste Mixing Facility		
Four (4) PbO Storage Tanks	058/377	20,000 lbs/hr (10 tph) PbO loading into the storage tanks
Primary and Secondary PbO Sifters	057/376	20,000 lbs/hr PbO processed through the primary and secondary sifters
Two (2) PbO Pre-hoppers	059/378	20,000 lbs/hr PbO loading into the pre-hoppers and into the weigh hoppers
Wet/Dry Mixer Process for Line Nos. 1 and 3 (includes 2 ovens)	017/234	15,000 lbs lead oxide paste/hr for Line Nos. 1 and 3 Paste Mixers combined
Pasting Line No. 1	034/134	10,000 lbs/hr pasted plates
Pasting Line No. 3	022/134B	10,000 lbs/hr pasted plates
Lead Oxide Manufacturing Facility		
Sovema Mill No. 1 Process Stack	042/348	2,400 lbs/hr PbO
Sovema Mill No. 2 Process Stack	055/372	3,025 lbs/hr PbO
Sovema Mill No. 3 Process Stack	056/374	3,025 lbs/hr PbO
Other Lead Emitting Operations		
Central Vacuum System	005/340	Normal or Maximum Plant Operation

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Test Methods and Procedures

22. Test the following Emission Units for the following pollutant(s) as specified in Specific Condition No. 25 within 60 days after achieving the maximum production rate specified in Specific Condition No. 21, but no later than 180 days after startup of each affected facility following modifications authorized by this permit, and annually thereafter. Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. and 40 CFR 60.8(a).

<u>Emission Unit</u>	<u>E.U. ID #/ Stack #</u>	<u>Particulate</u>	<u>Lead</u>	<u>Opacity</u>
Strip Caster, Three (3) Pellet Casters, and Cooling Water Exhaust for Sovema Mills 2 and 3 (includes new Sovema Lead Pot)	053/370	X	X	X
Sovema Lead Pot Heater	054/371	N/A	N/A	X
Four (4) PbO Storage Tanks	058/377	X	X	X
Primary and Secondary PbO Sifters	057/376	X	X	X
Two (2) PbO Pre-hoppers	059/378	X	X	X
Sovema Mill No. 2 Process Stack	055/372	X	X	X
Sovema Mill No. 3 Process Stack	056/374	X	X	X

[Section 403.161(1)(c) Florida Statutes; Rules 62-4.070(3) and 62-297, F.A.C.; and 40 CFR 60.8(a)]

23. Compliance with the emission limitations of Specific Condition Nos. 8, 9, 12, 13, 15, 16, 17, 18, and 19 shall be determined using EPA Methods 1, 2, 3, 4, 5, 9, and 12 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The EPA Method 9 visible emission test shall be a minimum of 30 minutes in duration and conducted concurrent with one of the lead test runs. The minimum requirements for stack sampling facilities, source sampling, and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [40 CFR 60.11 and Rule 62-4.070(3), F.A.C.]

24. The permittee shall provide at least the minimum requirements for stack sampling facilities as specified in 40 CFR 60.8(e)(1), (2), (3) and (4) and Rule 62-297.310(6), F.A.C. Source sampling platforms, platform access, and other associated work areas, whether permanent or temporary, shall be in accordance with Occupational Safety and Health Administration standards per 29 CFR 1910, Subparts D and E.

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25. Testing of emissions shall be conducted at 90-100% of the maximum permitted process rates as stated in Specific Condition No. 21. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates and actual operating conditions such as the baghouse and secondary filter pressure drops, where applicable, may invalidate the tests. [Rule 62-297.310(2)(b) and 62-4-070(3), F.A.C.]

26. The permittee shall notify the Environmental Protection Commission of Hillsborough County at least 30 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-4.070(3), F.A.C.; 40 CFR 60.7(a)6; and 40 CFR 63.9(f)]

27. The permittee shall comply with the following requirements: [Rule 62-204.800, F.A.C.]

- A) The permittee shall furnish the EPC written notification as follows: [40 CFR 60.7(a)]
 - 1. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The EPC may request additional relevant information subsequent to this notice. [40 CFR 60.7(a)(4)]
 - 2. Written notifications are to be made to the Air Management Division of the Environmental Protection Commission of Hillsborough County
- B) The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. [40 CFR 60.7(b)]
- C) The permittee shall maintain a file of all measurements, including performance testing measurements and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records. [40 CFR 60.7(f)]
- D) Compliance with opacity standards in this part shall be determined by conducting observations in accordance with Reference Method 9 in Appendix A (40 CFR 60). [40 CFR 60.11(b)]

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- E) The opacity standards set forth in this permit shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. [40 CFR 60.11(c) and 40 CFR 63.6(g)]
 - F) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPC which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d) and 40 CFR 63.6(e)]
 - G) No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment, or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR 60.12 and 40 CFR 63.4]
28. The permittee shall maintain records of all process control operating parameters and process upsets. The records shall include the nature and duration of upsets and emission control equipment malfunction, a detailed description of the nature and duration of the upset or malfunction, the expected effects on emissions and corrective actions taken or planned to avoid recurrences. Such records shall be available at the plant site for inspections by the Region IV Administrator of EPA or its authorized agent for a period of at least two years. [40 CFR 60.7(b), Rule 62-4.070(3), F.A.C. and Permit Nos. 0570001-026-AF/027-AC and 028-AC]
29. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing, and handling. Reasonable precautions shall include, but not be limited to, the following: [Rules 62-296.320(4)(c)1. and 62-4.070(3), F.A.C.]

Lead Oxide Manufacturing Facility

- A) Careful and regular service and replacement of the filter media as recommended by the manufacturer to prevent adhered dust from becoming airborne.
- B) Careful setting up and removal of containers for the collected dust. These containers shall be sealed while in operation and during transport to the disposal site.
- C) Daily cleaning of the area around the baghouses located either inside or outside the main building. Cleaning may be by HEPA vacuuming, mopping or sweeping with a dust-

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absorbing compound. Cleaning by means of dry sweeping or through the use of blowers is not permitted.

- D) Periodic inspection of the access hatches on the mills to ensure hatch bolts are secure and hatch remains closed during operation.
- E) The continuous particle sensor installed near the Sovema Mill No. 1 shall be operative. The sensor shall automatically shut down the mills, shut off the ventilation fans, close the louvers and sound the alarm system in the event a malfunction of the mill results in the release of lead oxide to the room.
- F) Cooling of the Sovema Mill baghouse hopper enclosure shall be accomplished by the in-line fan rated at 1,250 ACFM and exhausted through the roof. The duct equipped with a particle sensor shall automatically shut down the mill and shut off the fan in the event that lead oxide is drawn through the duct.
- G) The differential pressure monitor installed on the HEPA filters near the Process Vent Baghouses shall be operative. This monitor shall alarm in the event of a malfunction in the Process Vent Baghouses.
- H) [RESERVED]

Casting Facility

- I) Daily cleaning of work area. Cleaning may be by HEPA vacuuming, mopping or sweeping with a dust-absorbing compound. Cleaning by means of dry sweeping or through the use of blowers is not permitted.
- J) Exercise good housekeeping at all times.
- K) Regular service and replacement of fabric bags and filter media, as recommended by the manufacturer.

Paste Mixing Facility

- L) Regular service and replacement of fabric bags and filter media, as recommended by the manufacturer.
- M) Set up and remove the containers for the collected dust from baghouses and HEPA filters. These containers shall be hermetically sealed while in operation and during transport to the disposal site.
- N) All paved areas on the south side of the plant where the baghouses are located and where the trucks deliver lead oxide shall be totally enclosed or HEPA vacuum swept on a daily basis. Cleaning by means of dry sweeping or through the use of blowers is not permitted.

Other Lead Emitting Processes

Central Vacuum System

- O) Complete enclosure of the baghouse, hoppers, and fines handling area, or cleaning any operation area twice daily. Cleaning may be by HEPA vacuuming, mopping or wet

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sweeping with a dust-absorbing compound. Cleaning by means of dry sweeping or through the use of blowers is not permitted.

- P) Attend to any accidental spills or upsets promptly and effectively. Stop operations, if necessary.
- Q) Make plant personnel and contractors aware of the environmental requirements under this permit.
- R) Exercise good housekeeping practices at all times.
- S) Regular service and replacement of fabric bags and filter media as recommended by the manufacturer.

30. No owner or operator of a lead processing operation shall cause, allow, or permit the emissions of lead, including emissions of lead from vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, charging, melting, tapping, casting, storing or handling, unless reasonably available control technology (RACT) is employed to control such lead emissions. RACT measures shall include, but not be limited to, the following: [Rule 62-296.601(2)(a), F.A.C. and Permit Nos. 0570001-015-AC, -022-AC, -027-AC/026-AF, and Permit Application received May 23, 2013]

- A) All control measures listed in Specific Condition No. 29 of this permit.
- B) The permittee shall submit a final Fugitive Dust Control Plan to EPC within 30 days prior to commencement of pre-demolition/construction activities. At a minimum, Johnson Controls should implement the work practices detailed in the draft Fugitive Dust Control Plan dated July 15, 2013, during any pre-demolition, demolition, and construction operations. The ultimate responsibility for compliance with the plan rests upon Johnson Controls Battery Group, Inc.
- C) The permittee shall optimize the lead oxide delivery system. The optimization process shall include, but not be limited to, the following:
 - 1) Following the delivery truck inspection procedures for weld defects testing, checking the integrity of the flexible joints connecting hoppers, monitoring of the truck unloading process, and checking hose parameters.
 - 2) Using a dedicated location, located indoors, for the trucks during unloading.
 - 3) Utilize a dedicated plant transfer blower in lieu of the truck blower.
 - 4) Follow the lead oxide unloading procedures in Attachment A of this permit.
- D) Vacuuming the roads and other paved areas under the control of the owner or operator of the facility to prevent lead from becoming airborne.
- E) Landscaping or planting of vegetation on unpaved roads, parking areas and yards.
- F) Using hoods, fans, filters, and similar equipment to capture, contain, and control lead emissions.
- G) Enclosing or covering conveyor systems.

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31. The permittee shall keep the following records for a minimum of two years and make them available to any representative of the Department or the Environmental Protection Commission of Hillsborough County upon request: [Rules 62-296.600(5) and 62-296.700(6), F.A.C.; and 40 CFR 60.7(f)]

- A) Records of control equipment operating parameters and monitoring device calibration checks.
- B) Maintenance records on the control equipment, including black light tests, bag replacements, structural repairs, motor replacements and any adjustments that are made to monitoring devices.
- C) Records of control system and malfunctions or failures and corrective actions taken.

32. In order to demonstrate compliance with Specific Condition No. 21, the permittee shall maintain records of operations for the most recent three year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request. The records shall include, but not limited to, the following: [Rule 62-4.070(3) and 62-4.160(14), F.A.C.]

Casting Operation

- (A) Monthly total of lead strip produced by the strip caster, and lead pellets produced in the pellet casters (lbs).
- (B) Hours of operation for the strip caster and pellet casters (hrs/month).
- (C) Average hourly production on a monthly basis for the strip caster and pellet casters (lbs/hr).
- (D) Rolling twelve month total of lead strip produced by the strip caster and lead pellets produced by the pellet casters (tons).

Paste Mixing

- (E) Monthly total of pasted plates produced by Pasting Line No. 1 (lbs).
- (F) Monthly total of pasted plates produced by Pasting Line No. 3 (lbs).
- (G) Hours of operation for each Pasting Line (hrs/month).
- (H) Average hourly production on a monthly basis of Pasting Lines 1 and 3 (lbs/hr).

Lead Oxide Manufacturing

- (I) Monthly total of lead oxide produced in each Sovema Mill (lbs)
- (J) Hours of operation for each Sovema mill (hrs/month).
- (K) Average hourly production on a monthly basis for each mill (lbs/hr).
- (L) Rolling twelve month total of lead oxide produced (tons).

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Silo and Transfer Operations

(M) Monthly and rolling twelve month totals of lead oxide loaded into the lead oxide storage tanks from trucks and from the mills, separately (tons).

(N) Monthly and rolling twelve month totals of the hours of operation for the PbO storage tanks (hrs).

(O) Monthly total of lead oxide transferred to the paste mixers (lbs).

(P) Monthly hours of operation for the paste mixers (hrs).

(Q) Average hourly transfer rate of lead oxide to the paste mixers (lbs/hr).

33. The permittee shall comply with the following requirements: [Rule 62-204.800, F.A.C.]

A) For any emissions point controlled by a fabric filter, the permittee must meet the requirements of paragraph (1) and either paragraph (2) or (3) below. Fabric filters equipped with a high efficiency particulate air (HEPA) filter or other secondary filter are allowed to monitor less frequently (i.e. weekly), as specified in paragraph (b)(2)(iv) of 40 CFR 63.11423: [40 CFR 63.11423]

(1) The permittee must perform and record semiannual inspections and maintenance to ensure proper performance of each fabric filter. This includes inspection of structural and filter integrity.

(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. If a pressure drop is observed outside of the normal operational ranges, the permittee must record the incident and take immediate corrective actions. The permittee must also record the corrective actions taken. The permittee must submit a monitoring system performance report in accordance with §63.10(e)(3).

(3) The permittee must conduct a visible emissions observation at least once per day to verify that no visible emissions are occurring at the discharge point to the atmosphere from any emissions unit. If visible emissions are detected, the permittee must record the incident and conduct an opacity measurement in accordance with 40 CFR 60.374(b)(3). The permittee must record the results of each opacity measurement. If the measurement exceeds the applicable opacity standard in 40 CFR 60.372(a)(7) or (8), the permittee must submit this information in an excess emissions report required under 40 CFR 63.10(e)(3).

B) The non-opacity standards set forth in this permit shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. [40 CFR 63.6(f)]

C) The permittee shall submit an excess emissions and continuous monitoring system performance report and/or a summary report semiannually. [40 CFR 63.10(e)(3) and 40 CFR 63.11423(b)(2)]

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- D) All excess emissions and monitoring system performance reports and all summary reports, if required, shall be delivered or postmarked by the 30th day following the end of each calendar half. Written reports of excess emissions or exceedances of process or control system parameters shall include all the information required in 40 CFR 63.10(c)(5) through (c)(13), in 40 CFR 63.8(c)(7) and (c)(8), and in the relevant standard, and they shall contain the name, title, and signature of the responsible official who is certifying the accuracy of the report. When no excess emissions or exceedances of a parameter have occurred, or a CMS has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report. [40 CFR 63.10(e)(3) and 40 CFR 63.11423(b)(2)]
- E) The permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR 63 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. [40 CFR 63.10(b)]

34. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

35. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

36. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(204)(Modification), F.A.C. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C. and 40 CFR 60.15]

- A) Alteration or replacement of any equipment^{*} or major component of such equipment listed.
- B) Installation or addition of any equipment^{*} which is a source of air pollution.
- C) Increased production rate(s).

^{*} Not applicable to routine maintenance, repair, or replacement of component parts.

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37. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3), F.A.C.]

38. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

39. A minimum of two copies of an application for a federally enforceable state operating permit (FESOP) revision shall be submitted to the Environmental Protection Commission of Hillsborough County within 90 days of completion of all the emissions compliance testing required by this permit or at least 90 days prior to the expiration date of this permit, whichever occurs first. The application shall also include a copy of the required compliance tests and an Operation and Maintenance Plan for lead and particulate control for the constructed and modified emission units in accordance with Rules 62-296.600(4) and 62-296.700(6), F.A.C. [Rules 62-4.050(2), 62-210, 62-296.600(4), and 62-296.700(6), F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director