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Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Exide Technologies**	**AI #:**	**1396**	**TEMPO Activity No:**	**PER20070001**
Facility Name:	**Baton Rouge Recycling Plant**	**Remarks Submitted by:**	**Edward Hardy**		
Permit Writer:	**Tommy Menuet**	**Permit Writer Email address:**	**Tommy.Menuet@LA.GOV**		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permits Briefing Sheet", etc.).

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Facility Name	**Exide has recently decided to use "Baton Rouge Recycling Plant" as the facility name.**	**In order to change the facility name on a permit, a name change form will need to be submitted to LDEQ. The form and instructions can be found on our website.**
IX Insig. Activities	**Delete 93-8A and 93-8A (both) from the Insignificant Activities list. They are both out of service and inoperable.**	**Emission Point Number (EPN) 93-8A, Magnesium Hydroxide Tank No.1, and EPN 93-8A, Magnesium Hydroxide Tank No. 2 were removed from the proposed permit.**
X. Fed. Air Requir.		
EQT 5	**40 CFR 60 Subpart N should be blank. The regulation explicitly states it does not apply to reverberatory furnaces.**	**Applicability of 40 CFR 60 Subpart N was deleted from Table 1 - Applicable Louisiana and Federal Air Quality Requirements.**
EQT 48	**40 CFR 60 Subpart N should be blank. The regulation explicitly states it does not apply to blast furnaces.**	**Applicability of 40 CFR 60 Subpart N was deleted from Table 1 - Applicable Louisiana and Federal Air Quality Requirements.**

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Facility Name:	**Baton Rouge Smelter**	**Remarks Submitted by:**	**Edward Hardy**		
Permit Writer:	**Tommy Meuet**	**Permit Writer Email address:**	**Tommy.Meuet@LA.GOV**		

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis	Text refers to permit 0840-00004-V2, Should be 0840-00004-V1	Change made.
X.Fed. Air Requirements		
EQT 33	40 CFR 60 Subpart L should be labeled "1"	Change made.
EQT 48	40 CFR 60 Subpart L should be labeled "1"	Change made.
Emission Rates for TAP/HAP		
GRP 0009	Sulfuric Acid Avg lb/hr and T/yr listed hace a"<" symbol in front of the number, should be removed	Change made.

EQT 34 - 44	40 CFR 60 Subpart L should be blank. These are not furnaces of any kind.	Applicability of 40 CFR 60 Subpart L was deleted from Table 1 - Applicable Louisiana and Federal Air Quality Requirements.
Inventories		
EQT 0005	Operating Hours should be 8160; Operating Rate should be 21.5 MMBtu as described on the EIQ submitted.	The operating hours and operating rate for EQT 0005 were changed to 8,160 hours and 21.5 MMBtu, respectively.
Specific Requirements		
No. 2	Delete. There are no pot furnaces at the facility.	Specific Requirement No. 2 was removed from the proposed permit.
No. 19	Delete ", by the 31st of March,". This date has not been required by LDEQ for the last two years. The date is in §918 with a caveat. Insert "in accordance with §918.	"in accordance with LAC 33:III.918" is in the requirement.
No. 26	Delete. There are no pot furnaces at the facility.	Specific Requirement No. 26 was removed from the proposed permit.
No. 32	Delete. There are no pot furnaces at the facility.	Specific Requirement No. 32 was removed from the proposed permit.
No. 59	Delete. There are no pot furnaces at the facility.	Specific Requirement No. 59 was removed from the proposed permit.
No. 74	Delete. There are no pot furnaces at the facility.	Specific Requirement No. 74 was removed from the proposed permit.
No. 90	Citation LAC 33:III.1513 and requirement do not match.	Specific Requirement No. 90 was removed from the proposed permit. The citation was incorrect and the requirement was a duplicate.
No. 92	Delete ", by the 31st of March,". This date has not been required by LDEQ for the last two years. Insert "in accordance with §918.	"in accordance with LAC 33:III.918" is in the requirement.
No. 108	Delete. Kettles are not pot furnaces and are not mentioned in 40 CFR 60 Subpart L.	Specific Requirement No. 108 was removed from the proposed permit.
No. 109	Delete. Kettles are not pot furnaces and are not mentioned in 40 CFR 60 Subpart L.	Specific Requirement No. 109 was removed from the proposed permit.
No. 110	Delete. Kettles are not pot furnaces and are not mentioned in 40 CFR 60 Subpart L.	Specific Requirement No. 110 was removed from the proposed permit.
No. 115	Change "Furnaces Charge Feed rate" to "Finished Lead Production". Emissions are based on finished lead production. This was in the original furnace CAP request dated July 7, 2005.	"Furnaces Charge Feed rate" was changed to "Finished Lead Production rate" in Specific Requirement No. 115.
No. 118	Change "charge rate of" to finished lead production from".	"charge rate of" was changed to "finished lead production from" in Specific Requirement No. 118.
No. 125	Delete "Due quarterly, by June 30, September 30, December 31, March 31. This frequency is under review and is also covered under the general conditions.	This requirement is consist with the General Conditions.
No. 134	Delete ", by the 31st of March". Insert "in accordance with §918".	"in accordance with LAC 33:III.918" is in the requirement.
Emission Rates for Criteria Pollutants		
EQT 0007 (93-3A)	PM10 – Leave Max. Blank.	Max lb/hr will be removed from fugitives and tanks only. All other

		max lb/hr will remain.
EQT 0023 (93-7)	VOC – Leave Max. Blank; T/Yr should be 0.20.	Max lb/hr will be removed from fugitives and tanks only. All other max lb/hr will remain. Voc Tons/yr was changed to 0.20.
EQT 0033 (97-1)	PM10 – Lbs/hr 0 .79; T/Yr 3.20 per Additional Info 08/03/07.	The hourly average emission rate and annual maximum emission rate were change to 0.79 lbs/hr and 3.20 tons/yr, respectively.
FUG 0001 (95-4)	PM10 – Leave Max. Blank.	The change was made
GRP 002 (93-5 A-L)	CO – T/Yr should by 6.12; SO2 should be 0.01 lb/hr avg & max.	The hourly average and maximum emission rates for SO2 were changed to 0.01 lb/hr. CO annual maximum emission rate was changed to 6.12 tons/yr.
Emission Rates for TAP/HAP		
EQT 0005 (93-2)	Delete: Benzene, Toluene, n-Hexane; not in application. Emission are <0.0005 TPY.	Emission rates for Benzene, Toluene, and n-hexane were removed from the emission rates table for EQT 0005.
EQT 0007 (93-3A)	Lead – Leave Max. blank.	Max lb/hr will be removed from fugitives and tanks only. All other max lb/hr will remain.
EQT 0023 (93-7)	ID 93-7 Refer to EIQ for speciation.	Hexane, Benzene, Toluene, Ethyl benzene, and Xylene were added to the emission rates table for EQT 0023.
EQT 0026 (93-13)	Sulfuric Acid – Leave Max. blank.	The change was made.
EQT 0027 (93-14)	Sulfuric Acid – Leave Max. blank.	The change was made.
EQT 0028 (95-1)	Delete: Benzene, Toluene, n-Hexane; not in application. Emission are <0.0005 TPY.	Emission rates for Benzene, Toluene, and n-hexane were removed from the emission rates table for EQT 0028.
EQT 0029 (95-2)	Delete: Benzene, Toluene, n-Hexane; not in application. Emission are <0.0005 TPY.	Emission rates for Benzene, Toluene, and n-hexane were removed from the emission rates table for EQT 0029.
EQT 0032 (95-3)	Lead Max should be 0.002.	The hourly maximum emission rate for lead was changed to 0.002 lb/hr.
EQT 0033 (97-1)	Lead – Leave Max. blank.	The hourly maximum emission rate for Lead was removed. EQT 0033 serves as the control device for the kettles.
EQT 0048 (93-1A)	Delete: Benzene, Toluene, n-Hexane; not in application. Emission are <0.0005 TPY.	Emission rates for Benzene, Toluene, and n-hexane were removed from the emission rates table for EQT 0048.
FUG 0001 (95-4)	Delete Lead Compounds; not in application.	Lead emission rates were deleted in the emission rates table.
GRP 002 (93-5 A-L)	Delete: Benzene, Toluene, n-Hexane; not in application. Emission are <0.0005 TPY.	Emission rates for Benzene, Toluene, and n-hexane were removed from the emission rates table for EQT 002.
GRP 009 (Fur Cap)	Delete: Benzene, Formaldehyde, Toluene, n-Hexane; not in application. Emission are <0.0005 TPY. Add: Sulfuric Acid Avg lb/hr 1.487 & T/Yr 6.067.	Emission rates for Benzene, Toluene, and n-hexane were removed from the emission rates table for GRP 009. The hourly average and annual maximum emission rates for sulfuric acid were changed to 1.487 lb/hr and 6.067 tons/yr, respectively.
UNF 001 (Fac. Wide)	Delete: Benzene, Toluene, n-Hexane; not in application. Emission are <0.0005 TPY. Lead should be 4.701 tons and Sulfuric Acid should be 6.412 tons.	Emission rates for Benzene, Toluene, and n-hexane are require for facility wide emissions, UNF 001. The annual maximum emission rates for lead and sulfuric acid were changed to 4.701 and 6.412 tons/yr, respectively.

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Facility Name:	**Exide baton Rouge Smelter**	**Remarks Submitted by:**	**Serugudi Mani**		
Permit Writer:	**Tommy Menuet**	**Permit Writer Email address:**	**Tommy.Menuet@la.gov**		

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0840-00004-V1	I have concerns regarding the huge difference in the SO2 emissions from the # 1 Blast Furnace and # 3 Reverb. Furnace. Recommend referring to enforcement.	Referral sent to enforcement on 6/16/08.