



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TEL: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Sandusky County
Application No: 03-9232
NSPS

CERTIFIED MAIL

March 20, 1996

CROWN BATTERY MFG COMPANY
ROBERT MICHAEL, SR.
P.O. BOX 990
FREMONT, OH 43420

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
NORTHWEST DISTRICT OFFICE, DAPC

OHIO E.P.A.
MAR 20 96
ENTERED DIRECTOR'S JOURNAL

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

Permit to Install Terms and Conditions

Application No. 03-9232
APS Premise No. 0372030089
Permit Fee: \$800.00

Name of Facility: CROWN BATTERY MFG COMPANY

Person to Contact: ROBERT MICHAEL, SR.

Address: P.O. BOX 990
FREMONT, OH 43420

Location of proposed source(s): 1445 MAJESTIC DR
FREMONT, OHIO

Description of proposed source(s):
2 LEAD OXIDE PRODUCTION UNITS WITH BAGHOUSE AND HEPA FILTERS

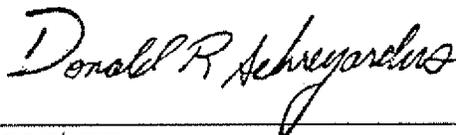
Date of Issuance: March 20, 1996

Effective Date: March 20, 1996

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

OHIO E.P.A.
MAR 20 96
ENTERED DIRECTOR'S JOURNAL

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

OHIO E.P.A.
MAR 20 96
ENTERED DIRECTOR'S JOURNAL

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-03.

OHIO E
MAR 20 1996
ENTERED DIRECTOR'S JOURNAL

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P014	#1 Lead Oxide Production Unit	KK
P015	#2 Lead Oxide Production Unit	KK

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- construction date (no later than 30 days after such date);
- anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- actual start-up date (within 15 days after such date); and
- date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and OEPA Northwest District Office - DAPC
347 North Dunbridge Road, P.O. Box 466
Bowling Green, Ohio 43402

OHIO E.P.A.
MAR 20 96
ENTERED DIRECTOR'S JOURNAL

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test

procedures, and the time, date, place and person(s) conducting such tests.

- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

<u>Source</u>	<u>Pollutants</u>
P014	PM, Pb
P015	PM, Pb

OHIO E.P.A.
MAR 20 96
ENTERED DIRECTOR'S JOURNAL

RECORD (S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. INTRODUCTION

1. Crown Battery Mfg. Co. of Fremont, Ohio has submitted a permit to install 2 lead oxide mills. This new equipment will allow the company to avoid the potential problems of transporting and handling the material by independent companies.

B. APPLICABLE EMISSION LIMITATIONS AND/OR CONTROL REQUIREMENTS:

1. Emissions from the #1 Lead Oxide Production Unit with baghouse and HEPA filter, OEPA emission unit P014, and #2 Lead Oxide Production Unit with baghouse and HEPA filter, OEPA emission unit P015, shall not exceed the following rates per unit:
 - a. 0.010 pound Pb per ton of lead feed (0.010 lb/hr);
and
 - b. 0.012 lb PM/hr.

OHIO E.P.A.
MAR 20 1996
ENTERED DIRECTOR'S OFFICE

These levels are based on NSPS subpart KK and AP-42 emission factors.

C. OPERATIONAL RESTRICTIONS: None

D. MONITORING AND/OR RECORD KEEPING REQUIREMENTS:

1. The company shall properly install, calibrate, and maintain monitoring devices for pressure drop that measure and record the pressure drops on the baghouses and HEPA filters controlling emissions from the lead oxide production units P014 and P015. The pressure drops determined during the most recent demonstration of compliance shall be maintained, at all times, when the emission unit is in operation. Operation of the baghouse and HEPA filter outside the established parameters may be considered by the OPEA, DAPC to be unacceptable operation and maintenance of the control system. The company may petition the OPEA for reestablishment of these parameters whenever warranted or during subsequent compliance tests.
2. All records, as well as any supporting analysis, shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours. All reports are to be submitted to the Ohio EPA, Northwest District Office, Division of Air Pollution Control, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

E. REPORTING REQUIREMENTS: None

F. TESTING REQUIREMENTS:

1. Crown Battery Mfg. Company shall determine compliance with the lead standard in accordance with 40 CFR 60.374.
2. Not later than 30 days prior to the proposed test date(s), the company shall submit an "Intent to Test" notification to the Ohio EPA, DAPC, Northwest District Office (NWDO). The notification shall describe in detail the proposed test methods and procedures, the emission unit(s) operating parameters, the times and dates of the tests, and the person who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the field office's refusal to accept the results of the emission tests.

G. MISCELLANEOUS REQUIREMENTS: None

OHIO E.P.A.
MAR 20 96
ENTERED DIRECTOR'S JOURNAL