



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
LUCAS COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 04-01413

Fac ID: 0448002011

DATE: 6/21/2005

Johnson Controls battery Group, Inc.
Chris Schlachter
10300 Industrial Road
Holland, OH 43528

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 Review Appeals Commission 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 within thirty (30) days after the notice of the Directors 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 Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

TDES



**Permit To Install
Terms and Conditions**

**Issue Date: 6/21/2005
Effective Date: 6/21/2005**

FINAL PERMIT TO INSTALL 04-01413

Application Number: 04-01413
Facility ID: 0448002011
Permit Fee: **\$750**
Name of Facility: Johnson Controls battery Group, Inc.
Person to Contact: Chris Schlachter
Address: 10300 Industrial Road
Holland, OH 43528

Location of proposed air contaminant source(s) [emissions unit(s)]:
**10300 Industrial Road
Holland, Ohio**

Description of proposed emissions unit(s):
An assembly line (COS line 8) to manufacture lead-acid batteries - the assembly line consisting of a plate stacker, a cast-on strap (COS) machine, heat seal station, and auto post bonder (APB).

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(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

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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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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) 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 cannot meet the requirements of this permit or cannot meet applicable standards.

10. 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 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements 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. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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14. 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.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
Lead	0.25
Particulate	8.66

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Facility ID: 0448002011

Emissions Unit ID: P055

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
<p>P055 - An assembly line (COS line 8) to manufacture lead-acid batteries - the assembly line consisting of a plate stacker, a cast-on strap (COS) machine, heat seal station, and auto post bonder (APB).</p>	<p>OAC rule 3745-31-05(A)(3)</p>
<p>Plate Stacker and COS (stack no. 260, RADCO #12)</p>	<p>40 CFR Part 60, Subpart KK</p>
	<p>OAC Rule 3745-17-07(A)(1)</p>
	<p>OAC Rule 3745-17-11(B)(1)</p>
	<p>OAC rule 3745-31-05(A)(3)</p>

	<u>Applicable Emissions Limitations/Control Measures</u>	
40 CFR Part 60, Subpart KK	<p>Stack particulate emissions (PE) shall not exceed 1.12 pounds per hour or 4.89 tons per year.</p> <p>The emissions of lead shall not exceed 0.046 pound per hour or 0.204 ton per year.</p>	<p>not exceed 0% opacity as a 6-minute average.</p> <p>See section A.2.b.</p> <p>See section A.2.b.</p>
OAC Rule 3745-17-07(A)(1)	See section A.2.c.	
OAC Rule 3745-17-11(B)(1)	<p>0.000437 gr/dscf of lead; and see Section A.2.a.</p> <p>Visible emissions of particulate shall not exceed 0% opacity as a 6-minute average.</p> <p>See section A.2.b.</p> <p>See section A.2.b.</p>	
	<p>Stack particulate emissions (PE) shall not exceed 0.86 pound per hour or 3.77 tons per year.</p> <p>The emissions of lead shall not exceed 0.010 pound per hour or 0.044 ton per year.</p>	
	<p>See section A.2.c.</p> <p>0.000437 gr/dscf of lead; and see Section A.2.a.</p> <p>Visible emissions of particulate shall</p>	

2. Additional Terms and Conditions

- 2.a** Visible particulate emissions, from the stacks serving this emissions unit, shall not exceed 0% opacity as a 6-minute average, except as provided by the rule.
- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** The requirements of this rule also include compliance with the requirements of 40 CFR 60, Subpart KK. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

B. Operational Restrictions

- 1. To ensure the baghouse is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, a pressure drop across the baghouse between 1 to 6 inches of water shall be maintained at all times except after rebagging operations at which time a pressure drop of less than 1 shall be acceptable.
- 2. To ensure the control device is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate and lead emission rate, a pressure drop across the RADCO (HEPA) filters between 1 to 5 inches WC shall be maintained at all times except after replacement or complete cleaning of the HEPA filters at which time a pressure drop of less than 1 shall be acceptable.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain a monitoring device capable of accurately measuring the pressure drop across the control device(s). The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- 2. The permittee shall check the pressure drop across each control device a minimum of once per day when the units are in operation and maintain daily records of the pressure drop readings.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

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above-mentioned allowable pressure drop range. The deviation reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous 3 calendar months. These reports shall be submitted to the Toledo Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.000437 gr/dscfm of lead (stacks 69 & 260).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Sections 60.8 and 60.374 using methods and procedures specified in Method 12 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:

0 percent opacity, as a 6-minute average (stack 69 & 260).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emission observations performed in accordance with 40 CFR Part 60, Section 60.374 using methods and procedures specified in Method 9 of 40 CFR Part 60, Appendix A and Section 60.11.

- c. Emission Limitation:

1.12 pounds of PE per hour (stack 260).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 5, or approved alternate, of 40 CFR Part 60, Appendix A and Section 60.8 and the procedures in OAC rule 3745-17-03(B)(1).

d. Emission Limitation:

4.89 tons of PE per year (stack 260).

Applicable Compliance Method:

The 4.89 TPY emission limitation was developed by multiplying the 1.12 lbs/hour emission rate by a maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

0.046 pound of lead per hour (stack 260).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 12 of 40 CFR Part 60, Appendix A and Section 60.8.

f. Emission Limitation:

0.204 ton of lead per year (stack 260).

Applicable Compliance Method:

The 0.204 TPY emission limitation was developed by multiplying the 0.046 lb/hour emission rate by a maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

0.86 pound of PE per hour (stack 69).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in

accordance with the methods and procedures specified in Methods 1 through 5, or approved alternate, of 40 CFR Part 60, Appendix A and Section 60.8 and the procedures in OAC rule 3745-17-03(B)(1).

h. Emission Limitation:

3.77 tons of PE per year (stack 69).

Applicable Compliance Method:

The 3.77 TPY emission limitation was developed by multiplying the 0.86 lb/hour emission rate by a maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

i. Emission Limitation:

0.010 pound of lead per hour (stack 69).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 12 of 40 CFR Part 60, Appendix A and Section 60.8.

j. Emission Limitation:

0.044 ton of lead per year (stack 69).

Applicable Compliance Method:

The 0.044 TPY emission limitation was developed by multiplying the 0.010 lb/hour emission rate by a maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum

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production rate at which the affected facility will be operated, but not later than 180 days after initial startup.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for lead emissions, particulate matter, and for the 0% opacity limit.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable visible emission or mass emission rate(s):
 - i. For lead, Methods 1-4 and Method 12 of 40 CFR Part 60, Appendix A;
 - ii. For opacity, Method 9 of 40 CFR Part 60, Appendix A and the procedures in 40 CFR Part 60.11;
 - iii. For particulate, Methods 1-5, or approved alternate, of 40 CFR Part 60, Appendix A.
- d. The test(s) shall be conducted while all of the emissions units served by the stack are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or Local Air Agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or Local Air Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA District Office's or Local Air Agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or Local Air Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or Local Air Agency.

F. Miscellaneous Requirements

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Johns

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None.