

DATE: 9/23/10

SUBJECT: Exide Technologies
Reading Smelter Plant
File No. 06-05066 (B.1.)
Laureldale Borough/Muhlenberg Township, Berks County

FROM: Thomas Hanlon *THH 9/23/10*
Chief, East Permitting Section
Air Quality, SCRO

AND: William R Weaver *WRW 9/23/10*
Program Manager
Air Quality, SCRO

Public notice for the revised draft permit was done as follows:

Sent to EPA 6/25/10
Sent to Company: 5/26/10
Published in PA Bulletin: 6/5/10

EPA did not offer any comments. Public comments on the revised draft permit were received from Wheeler Environmental Services on behalf of the County of Berks, and from a private citizen. These comment documents and DEP's comment and response document are included as an attachment to this memo.

It is recommended that the renewal of the Title V Operating Permit No. 06-05066 be issued.

cc: Permits
Reading District Office
EPA

Attachment A
Comment and Response Document for
Re-draft of Title V Operating Permit No. 06-05066 for Exide Technologies Reading Smelter Plant

Category	#	Comment	Response	Change to Draft?
Comments dated 6/8/10 from Mr. and Mrs. Rudy Pennig				
Malodor issues	1	The malodors from Exide are "horrible." The commenter experiences it personally and hears complaints about it from neighbors.	Despite diligent investigation of complaints, DEP has not documented a malodor violation at the Exide facility since 2008. Furthermore, the number of unverified complaints is significantly less than prior to the imposition of the malodor COA by DEP on 12/20/07, and the resulting replacement of the two smelter afterburners.	No
Overall permitting issues	2	If they don't meet specifications, how are they allowed to run for five years without a permit?	Exide has not been operating without a permit. The facility's Title V permit that was issued on 11/5/00 has remained valid. It is true that the permit has a nominal expiration date of 7/31/05. Nevertheless, DEP regulations provide that a valid existing permit remains valid so long as the permittee has submitted a timely and complete renewal application. Exide did this.	No
Malodor issues	3	It is a blatant lie that no complaints have been filed since 2008. The complainant has called many times and has not had a return call, nor has anyone been out to address the odors since the previous DEP inspector left.	See the response to Comment 1. The Department logs each complaint received at the Reading District Office and investigates in person, if possible. While DEP, as a matter of policy, does not confirm or deny the identity of complainants, DEP records indicate appropriate followup on complaints have been received in this case.	No
Malodor issues	4	If knowing that burning at a higher temperature would reduce the odors, why hasn't it been done years ago?	The improvements at the facility related to the afterburners and their operating temperatures, were developed based on a Consent Order and Agreement signed with DEP on 12/20/07.	No
Malodor issues	5	Who is going to watch over the so-called temperature increase to know its being done?	Exide is required to continuously monitor the afterburner temperatures and to submit periodic reports to the Department. The Department periodically inspects the facility to check on compliance.	No
Malodor issues	6	We feel that if Exide wanted to be a good neighbor, they would have addressed these issues when foul odors were first emitted, and not let it get to the point when we have health concerns. We are afraid to have our grandchildren play outside because of the effect on their health.	DEP has diligently enforced existing regulations regarding the Exide facility. These regulations have been designed in the interest of protecting public health and welfare.	No
Non-air quality issues	7	The people on Mannerchor Road have polluted wells and Exide provides bottled water to them.	This issue is not related to the Title V permit renewal.	No
Non-air quality issues	8	Exide has polluted the soil on its property and the soil in Bernhart Park.	This issue is not related to the Title V permit renewal.	No
Non-air quality issues	9	Issuing a permit before this is cleaned up will not eliminate the problem. Have them pay their fines and abide by the rules of pollution.	This issue is not related to the Title V permit renewal. Also, it should be noted that Exide has paid substantial fines related to past air quality violations. As of the date this comment and response document, all outstanding Air Quality violations have been addressed.	No
Comments dated 7/6/10 from Wheeler Environmental Services on behalf of the County of Berks				
Emission inventory issues	10	We thank the PADEP for requiring that emissions that occur during startup, shutdown, or malfunction (SSM) events be reported by the permittee and that 10 emissions during SSM events meet the MACT emission limitations.	DEP appreciates the commenter's support for this position.	No
Emission inventory issues	11	We request that PADEP require estimation of fugitive dust emissions from both truck traffic on onsite roadways and from traffic on public roads near the entrance to the smelter.	DEP is requiring Exide to develop more detailed estimates of fugitive dust emissions from on-site roadways. DEP does not have the authority to require Exide to estimate fugitive dust emissions from traffic on public roads near the entrance to the smelter.	No
Fugitive Emission Issues	12	We believe that many of the public comments that have been ignored by the PADEP relate not only to ambient lead impacts and compliance with the 2008 Lead NAAQS but also to compliance with PA's fugitive emissions standards at section 123.1 and 123.2. We therefore request that PADEP revisit these comments and adequately address comments related to fugitive emissions monitoring and work practice standards.	DEP has not had recent complaints of visible fugitive emissions either on-site at the Exide Smelter (123.1), or traveling off-site (123.2). DEP has re-reviewed the comments referenced by the commenter and does not see additional issues raised in the comments that should be addressed in a fugitive emissions context outside of the lead nonattainment planning process. Nevertheless it should be noted that DEP's Waste Program signed a COA with Exide dated 6/7/10 which addresses Exide's Fugitive Dust Control Operating Procedures (FDCOP). The Title V permit will be revised to require Exide to update its FDCOP within 30 days of Title V permit issuance, to ensure consistency with the COA and other provisions of the Title V permit.	Yes
Fugitive Emission Issues	13	We request that appropriate sweeping and road washing techniques be employed to ensure compliance with PA's fugitive emissions standards.	No detail is provided in the comment as to how the commenter's view of "appropriate" sweeping and road washing techniques would be different than proposed by DEP in the draft permit. DEP continues to believe that the requirements proposed in the permit are appropriate.	No

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Fugitive Emission Issues	14	We request that daily Method 9 visible emissions observations be required each shift and during SSM events for the smelter furnace, refinery, and material handling areas to ensure that no visible fugitive emissions are observed to demonstrate ongoing compliance with PA's fugitive emissions standards. We challenge and reject the PADERP's conclusion that operation of the network of ambient lead samplers by Exide can be discontinued because the requirements of the 1984 Lead SIP are no longer applicable. We reject this conclusion and believe that the intent of the 1984 SIP was to require not only the continued operation of ambient lead monitoring networks surrounding the two secondary lead smelters in Berks County, but also the ongoing obligation by the PADERP, USEPA, and the smelters to evaluate ambient lead impacts following modifications made to the smelter operations.	See the response to Comment 12. It should also be noted that the current draft of the permit requires daily inspections around the plant periphery for visible stack emissions, fugitive emissions and malodorous emissions. DEP and EPA have both concluded that the requirements of the 1984 SIP ended upon the termination of the COA upon which the SIP was based. This COA explicitly was set to terminate on 4/1/89.	No
Lead issues	15	The inclusion of ambient lead monitoring network requirements in the existing Exide Title V permit means that this is a federally enforceable applicable air quality requirement that cannot be excluded from the Title V permit renewal. Even if the PADERP and USEPA conclude that there are no ongoing obligations by Exide to operate their ambient lead monitoring network, we request that the PADERP use its authority under the PA Air Pollution Control Act to mandate the continued operation of the company-operated lead monitoring network. We believe it would be tragic if the promulgation of a much more stringent lead ambient air standard in 2008 could result in the operation of fewer rather than more lead monitors in the Laureldale area.	The commenter is incorrect in asserting that there are any ambient lead monitoring requirements in Exide's current Title V permit. There are none. Furthermore, even if there were such requirements, this would not prevent DEP from modifying or deleting those requirements for good cause in the permit renewal. The company-operated lead samplers have not been required to operate with the necessary QA/QC procedures to be used as valid indicators of compliance with the Lead NAAQS. Furthermore, it should be noted that per federal requirements, DEP has located a DEP-operated lead monitor at the location of the estimated maximum running 3-month concentration.	No
Lead issues	17	A review of the most recent lead monitoring data (3-month averages over first quarter 2010) collected by the PADERP at the new lead monitor located adjacent to Exide shows that the PADERP's lead levels are significantly lower than the lead levels measured by the Exide-operated lead samplers located at other areas in different directions downwind of the smelter. This shows the need for additional lead monitoring in the Laureldale area to better pinpoint the extent of excessive lead impacts on the community and to assist the PADERP in determining appropriate lead control measures to address the impending lead nonattainment designation for the area.	See the response to Comment 17. The data from the company-operated lead monitors was not collected in a manner that allows it to be used in drawing conclusions about compliance with the lead NAAQS.	No
Lead issues	18	We note that many comments concerning lead emissions and impacts on the community have not been addressed by the PADERP based on the position that it is premature to conclude that the Laureldale area will be designated nonattainment with the 2008 Lead NAAQS (response 60 in the comment/response matrix table provided with the PADERP review memo).	In the event that EPA designates the area around Exide as nonattainment for lead, DEP will be required to develop a State Implementation Plan to achieve attainment. The commenter's suggestions will be considered as part of this process.	No
Lead issues	19	We request that the DEP review and address each one of the public comments that have been deferred when the imminent nonattainment designation is made by the USEPA this October (note that USEPA responded to PADERP's recommendations for nonattainment areas in mid-July and supported the inclusion of the Laureldale area as lead nonattainment).		No
Lead issues	20	We believe that Exide's poor compliance history with the malodor standard provides ample reason to impose routine THC compliance testing (at least annually) to demonstrate that the afterburners provide sufficient capture and destruction efficiencies for malodorous compounds.	See the response to Comment 1.	No
Malodor issues	21	We thank the PADERP for imposing a continuous afterburner temperature requirement on the two afterburners employed by Exide to both control organic air toxics under Subpart X and to oxidize sulfurous and other reduced compounds from the blast furnaces that can result in objectionable offsite odors. However, we object to the PADERP specifying a temperature of 1,200°F with a reference to the PA malodor standard at 25 PA Code 123.31. We believe instead that it is reasonable for the PADERP to require that the afterburners meet the average temperatures documented during the most recent THC emission test program under Subpart X.	The Subpart X regulation was not designed to address malodors. The 123.31 regulation explicitly addresses malodors. DEP believes that the 123.31 regulation provides the appropriate temperature benchmark for malodors.	No
Malodor issues	22			No

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Malodor Issues	23	The temperature specified in the PA state malodor standard was not established based on odorous emissions that result from a lead smelter's operations. The afterburner temperature limits specified by PADERP as BAT for these types of sources should be imposed instead of the 1,200° F level. We request that a minimum temperature limit of 1,600° F be imposed based on precedent for other hazardous waste combustion sources.	The 123.31 regulation establishes a generic standard for the control of odors at a wide variety of facilities. See the response to Comments 22 and 23. This comment is inconsistent with the same commenter's earlier assertion (Comment 22) that the afterburner temperature limit should be set equal to the Subpart X limit. Furthermore, BAT is only applicable to the installation of new equipment.	No
Malodor Issues	24	We also request that the new malodor portion of the Title V permit include routine (at least annual) emissions testing for capture and destruction of THC and TRS emissions by the furnace afterburners.	See the responses to Comments 26 and 27. The draft permit already requires THC testing at intervals required in the Subpart X regulation. Given the lack of recent documented malodor violations, and the reduction in malodor complaints, DEP does not believe that annual THC testing is required. TRS testing is not required by Subpart X or by any other regulation.	No
Testing Issues	25	The PADERP has not adequately addressed the County of Berks comments regarding the need for furnace and other smelter source fume capture efficiency testing to better estimate the magnitude of fugitive emissions from the Exide operations during normal operations and during SSM events. We once again request that the PADERP adequately assess fugitive lead and other HAP emissions associated with Exide's smelter operations (both during normal operations and during SSM events) and require that these fugitive emissions be reported annually during Title V emission fees for these emissions.	In a letter to DEP dated 6/4/10, Exide asserts that "The air pollution controls applied to the Facility's buildings serve the primary purpose of maintaining inward air flow at any building openings (also referred to as negative pressure) to prevent the escape of fugitive emissions that might evade capture by process emission controls. These systems capture any fugitive emissions and remove them via the route of the control devices. Application of this technology has been determined to be in compliance with the Maximum Achievable Control Technology (MACT) requirements promulgated by U.S. EPA at 40 CFR Part 63, Subpart X. Due to these operating practices and engineering controls at the Exide facility, including the operation of buildings under negative pressure, Exide reassesses that the potential release of fugitive emissions is negligible, to the extent that information necessary to develop meaningful numeric estimates is unavailable." DEP inspections at Exide have not indicated any specific reason to contest the above assertions by Exide. Nevertheless, DEP will require Exide to estimate and report excess emissions from SSM events.	No
Testing Issues	26	We object to the PADERP's refusal to require TRS and THC emission testing of the furnace and furnace charging systems to demonstrate compliance with PA's malodor, H2S, and fugitive emission standards and with USEPA's 40 CFR 63 Subpart X standard. The substantial modifications made by Exide to their furnace and afterburner control systems dictates that THC testing be conducted for the furnace and furnace charging systems to ensure adequate capture and control of furnace vHAP and malodorous emissions is being achieved.	DEP has not refused to require THC testing. Exide was in fact required to perform THC testing when each of the smelter afterburners was recently replaced. The test related to the replacement of afterburner #2 was completed on 2/18-2/1/09. The test related to the replacement of afterburner #1 was conducted on 4/5-6/10. Both tests showed compliance with the Subpart X THC standard. With regard to TRS testing, DEP has concluded TRS is not a good surrogate for odor emissions, due to the heterogeneous nature of TRS compounds, as well as issues associated with fine particle adsorption of odorous compounds, which can cause perceived odors to be different than might be predicted based on raw measurements of specific sulfur compound emissions.	No
Testing Issues	27	We request that PADERP require testing of the furnace charging dust collector exhausts for THC and TRS to identify the magnitude of uncaptured furnace emissions consistent with the THC testing required under the Subpart X MACT standard.	DEP believes that it is appropriate to use the Subpart X requirements as a guide for the frequency and nature of THC testing. With regard to capture efficiency, please see the response to Comment 26. With regard to TRS testing, please see the response to Comment 27.	No

6/8/2010

RECEIVED DEP
SOUTHCENTRAL REGION

10 JUN 11 AM 10:00

Dear Mr Hanlon

REACTING DIST OFFICE

In regards to your pending Eagle 6/5/10 - our concerns over Epipe in addition to the horrible odor are.

If they don't meet specifications, how are they allowed to run for 5 yrs without a permit?

It is a blatant lie that no complaints have been filed since 2008 - I know for a fact that my husband and I called many times re: the odor, and we've not had a return call, nor has anyone been out here to address the odors - not since Julia left!

If knowing that turning at a higher temp would reduce the odors why hasn't it been done years ago? Who is going to watch over these, so called temp. increases to know it's being done?

We personally feel that if Epipe wanted to be a good neighbor they would have addressed these issues when foul odors were first emitted! not let it get to the point where we have health concerns.

We're afraid to have our grandchildren here to play outside because of the ill effect on their health.

The people on Maxwells Rd have polluted wells and Epipe provides bottled water because nothing is being done! Take a look at our one time beautiful Bernhard Lake near Epipe - but don't walk on those grounds because they are polluted as noted on the signs from the city. They-

If you would care drill areas in Epide property, you would see that their land is polluted to - I remember this beautiful park as a kid because I fished in the lake many a day. The overflow stream from the lake is polluted with sulfuric acid - even a frog would n't live there.

Issuing a permit before this is cleaned up will not eliminate the problem. Have them pay their fines and abide by the rules of pollution.

Show some concern for the residents! You don't have this in your neighborhood or in your homes why should we!

There's a new housing development aside of Epide, it should be interesting when these people become aware of what's going on. I'm hearing it already - what's that God awful smell we get especially on a damp ugly day - I'll tell you what it is, it's sulphur dioxide plus what lead flakes escape from the good neighbor Epide.

These people are a lot bigger than the city and has to put up with this aggravation!

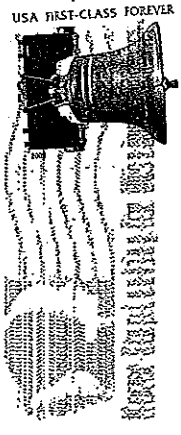
I could write more, but I'll stop here. If you don't get it by now, you never will.

It sounds like one big joke, they'll run their furnaces at a higher temp! Where was this all these many years while we had to close our windows on a beautiful day???

Sincerely,
Mrs. Rudy Perry
1304 Elizabeth Ave.
Laureldale, Pa. 19605

READING DIST. OFFICE
10 JUN 11 AM 10:00
RECEIVED - DEP
SOUTHERN REGION

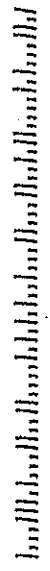
Mr Rudy Pfennig Jr
1304 Elizabeth Ave
Reading PA 19605-2604



POSTAGE WILL BE PAID BY ADDRESSEE
10 JUN 2005 PM 4:17

Mr William Borst
Pa. SEP
Rty. District Office
1005 Crossroads Blvd.
Reading, Pa. 19605

RECEIVED - DEP
SOUTHCENTRAL REGION
10 JUN 11 AM 10:00
READING DIST. OFFICE



19605-2604

Weaver, William (DEP)

From: Wheeler Environmental Services [wheeleres@dejazzd.com]
Sent: Tuesday, July 06, 2010 3:48 PM
To: Weaver, William (DEP); Hanlon, Thomas
Cc: Mark Scott; CLeinbach@countyofberks.com; KBarnhardt@countyofberks.com
Subject: Exide DRAFT Title V Comments

Mr. Weaver:

Attached are the County of Berks comments with regard to the Exide Technologies Draft Title V permit. If you have any questions, please feel free to contact us.

Sincerely,
Steve Wheeler

Stephen A. Wheeler
President
Wheeler Environmental Services
P.O. Box 501
Boyertown, PA 19512
Phone: 610-369-2905
Fax: 610-369-2906
Cell: 610-334-4209
wheeleres@dejazzd.com

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Wheeler Environmental Services

PO BOX 501 – Boyertown, PA 19512-0501
wheeleres@dejazzd.com

Phone: 610-369-2905
Fax: 610-369-2906

July 6, 2010

Sent via email

Mr. William Weaver
Southcentral Region Air Program Manager
PADEP- Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110

RE: Comments on Proposed Title V Permit for Exide Technologies Reading, PA Smelter and 5/21/10 PA DEP Review Memo from R. Fitterling to W. Weaver

Mr. Weaver:

Wheeler Environmental Services (WES), on behalf of the County of Berks, is pleased to present the following comments for the proposed Title V permit for Exide Technologies, Reading, PA Smelter and comment regarding the May 21, 2010 PADEP review memo from Mr. Roger Fitterling to William Weaver.

We thank the PADEP for requiring that emissions that occur during startup, shutdown, or malfunction (SSM) events be reported by the permittee and that emissions during SSM events meet the MACT emission limitations. However, the PADEP has not adequately addressed the County of Berks comments regarding the need for furnace and other smelter source fume capture efficiency testing to better estimate the magnitude of fugitive emissions from the Exide operations during normal operations and during SSM events. We once again request that the PADEP adequately assess fugitive lead and other HAP emissions associated with Exide's smelter operations (both during normal operations and during SSM events) and require that these fugitive emissions be reported annually and Title V emission fees be levied for these emissions

We object to the PADEP's refusal to require TRS and THC emission testing of the furnace and furnace charging systems to demonstrate compliance with PA's malodor, H₂S, and fugitive emission standards and with USEPA's 40 CFR 63 Subpart X standard. The substantial modifications made by Exide to their furnace and afterburner control systems dictates that THC testing be conducted for the furnace and furnace charging systems to ensure adequate capture and

control of furnace vHAP and malodorous emissions is being achieved. We believe that Exide's poor compliance history with the malodor standard provides ample reason to impose routine THC compliance testing (at least annually) to demonstrate that the afterburners provide sufficient capture and destruction efficiencies for malodorous compounds.

We challenge and reject the PADEP's conclusion that operation of the network of ambient lead samplers by Exide can be discontinued because the requirements of the 1984 Lead SIP are no longer applicable. We reject this conclusion and believe that the intent of the 1984 SIP was to require not only the continued operation of ambient lead monitoring networks surrounding the two secondary lead smelters in Berks County, but also the ongoing obligation by the PADEP, USEPA, and the smelters to evaluate ambient lead impacts following modifications made to the smelter operations. In addition, the inclusion of ambient lead monitoring network requirements in the existing Exide Title V permit means that this is a federally enforceable applicable air quality requirement that cannot be excluded from the Title V permit renewal.

Even if the PADEP and USEPA conclude that there are no ongoing obligations by Exide to operate their ambient lead monitoring network, we request that the PADEP use its authority under the PA Air Pollution Control Act to mandate the continued operation of the company-operated lead monitoring network. We believe it would be tragic if the promulgation of a much more stringent lead ambient air standard in 2008 could result in the operation of fewer rather than more lead monitors in the Laureldale area. A review of the most recent lead monitoring data (3-month averages over first quarter 2010) collected by the PADEP at the new lead monitor located adjacent to Exide shows that the PADEP's lead levels are significantly lower than the lead levels measured by the Exide-operated lead samplers located at other areas in different directions downwind of the smelter. This shows the need for additional lead monitoring in the Laureldale area to better pinpoint the extent of excessive lead impacts on the community and to assist the PADEP in determining appropriate lead control measures to address the impending lead nonattainment designation for the area.

We thank the PADEP for imposing a continuous afterburner temperature requirement on the two afterburners employed by Exide to both control organic air toxics under Subpart X and to oxidize sulfurous and other reduced compounds from the blast furnaces that can result in objectionable offsite odors.

However, we object to the PADEP specifying a temperature of 1,200°F with a reference to the PA malodor standard at 25 PA Code 123.31. We believe instead that it is reasonable for the PADEP to require that the afterburners meet the average temperatures documented during the most recent THC emission test program under Subpart X. The temperature specified in the PA state malodor standard was not established based on odorous emissions that result from a lead smelter's operations. The afterburner temperature limits specified by PADEP as BAT for these types of sources should be imposed instead of the 1,200° F level. We request that a minimum temperature limit of 1,600° F be imposed based on precedent for other hazardous waste combustion sources. We also request that the new malodor portion of the Title V permit include routine (at least annual) emissions testing for capture and destruction of THC and TRS emissions by the furnace afterburners. We request that PADEP require testing of the furnace charging dust collector exhausts for THC and TRS to identify the magnitude of uncaptured furnace emissions consistent with the THC testing required under the Subpart X MACT standard.

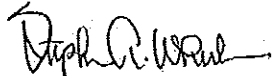
We note that many comments concerning lead emissions and impacts on the community have not been addressed by the PADEP based on the position that it is premature to conclude that the Laureldale area will be designated nonattainment with the 2008 Lead NAAQS (response 60 in the comment/response matrix table provided with the PADEP review memo). We request that the DEP review and address each one of the public comments that have been deferred when the imminent nonattainment designation is made by the USEPA this October (note that USEPA responded to PADEP's recommendations for nonattainment areas in mid-July and supported the inclusion of the Laureldale area as lead nonattainment). We believe that many of these comments that have been ignored by the PADEP relate not only to ambient lead impacts and compliance with the 2008 Lead NAAQS but also to compliance with PA's fugitive emissions standards at section 123.1 and 123.2. We therefore request that PADEP revisit these comments and adequately address comments related to fugitive emissions monitoring and work practice standards. For example, we request that PADEP require estimation of fugitive dust emissions from both truck traffic on onsite roadways and from traffic on public roads near the entrance to the smelter and that appropriate sweeping and road washing techniques be employed to ensure compliance with PA's fugitive emissions standards. We also request that daily Method 9 visible emissions observations be required each shift and during SSM events for the smelter

Wheeler Environmental Services
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furnace, refinery, and material handling areas be required to ensure that no visible fugitive emissions are observed to demonstrate ongoing compliance with PA's fugitive emissions standards.

If you should have any questions regarding these comments, please feel free to contact us.

Sincerely
Wheeler Environmental Services



Stephen A. Wheeler
President

Berks County 7-5-10 Comment response Document

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