

**PERMIT AMENDMENT NO. 3691-089-0012-S-05-2**  
**ISSUANCE DATE:**



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

**ENVIRONMENTAL PROTECTION DIVISION**

**Air Quality – Permit Amendment**

In accordance with The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to or in effect under that Act, Permit No. 3691-089-0012-S-05-0 issued on July 11, 2013 to:

**Facility Name:** Trojan Battery Company, LLC  
**Facility Address:** 5174 Minola Drive  
Lithonia, Georgia 30038 DeKalb County  
**Mailing Address:** 5174 Minola Drive  
Lithonia, Georgia 30038  
**Facility AIRS Number:** 04-13- 089-00012

for the following: For the operation of an existing lead-acid battery manufacturing plant and an existing lead oxide manufacturing facility. This Permit is issued for the purpose of establishing practically enforceable limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

is hereby amended as follows: To construct and operate one (1) 100 ton Unmilled oxide storage silo (US3) and one (1) 50 ton milled oxide storage silo (MS4). These silos will be enclosed and will be controlled by existing baghouse DC1. To construct and operate one (1) new Continuous Caster (CC1), three (3) Lead Melting Pots (LP7 – LP9), and three (3) Grid Casting Machines (GC20 – GC22). These pieces of equipment will be controlled by existing baghouse BH3. To construct and operate one (1) new Continuous Paster (CP1), one (1) lead oxide batch silo (PO3), one (1) Paste Mixer (PM2), one (1) plaste pasting machine (PA2), one (1) WIRTZ oven (OV2), and one (1) plate stacker station (PS1). These pieces of equipment for the Paste Mixing Facility will be controlled by existing baghouses BH1 and BH2. To construct and operate one (1) central vacuum system (V2). The central vacuum system (V2) will be controlled by existing baghouse BH4.

Reason for Amendment: Application Number 28665 and December 13, 2022

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 5 page(s).

This Permit Amendment is hereby made a part of Permit No. 3691-089-0012-S-05-0 and compliance herewith is hereby ordered. Except as amended hereby, the above referenced Permit remains in full force and effect.



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Richard E. Dunn, Director  
Environmental Protection Division

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

**Permit Amendment No.**  
**3691-089-0012-S-05-2**

**Page 1 of 5**

**1. General Requirements**

NEW CONDITION

- 1.8 The Permittee shall comply with all applicable provisions, standards and requirements of 40 CFR 60 Subpart A – “General Provisions” and 40 CFR 60 Subpart KKa – “Standards of performance for Lead Acid Battery Manufacturing Plants.”  
[40 CFR 60 Subparts A and KKa]

**2. Allowable Emissions**

MODIFIED CONDITION

- 2.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the following sources any gases which exhibit greater than zero percent (0%) opacity, or contain lead emissions in excess of:  
[40 CFR 60.372a(a)(1), (2), (3), (4), and (6)]
- a. 0.08 ~~0.40~~ mg/dscm from any grid casting facility.
  - b. 0.10 ~~1.00~~ mg/dscm from any paste mixing facility.
  - c. 1.00 mg/dscm from any three-process facility.
  - d. 5.0 mg/kg lead feed from any lead oxide manufacturing facility (0.01 lb/ton)
  - e. 1.00 mg/dscm from any other lead-emitting facility.

**3. Fugitive Emissions**

NEW CONDITION

- 3.2 The Permittee shall prepare, and at all times operate according to, a fugitive dust mitigation plan that describes in detail the measures that will be put in place and implemented to control the fugitive dust emissions in the lead oxide unloading and storage areas. The Permittee shall submit the fugitive dust mitigation plan to the Division for review and approval within 15 days of starting operation of the new equipment proposed in Application Number 28865 and any time changes are made. The fugitive dust mitigation plan must at a minimum include the requirements specified in 40 CFR 60, Subpart KKa.  
[40 CFR 60.372a(c) and 391-3-1-.03(2)(c)]

**4. Process & Control Equipment**

NEW CONDITION

- 4.4 The Permittee shall conduct quarterly inspections and maintenance to ensure proper performance of each fabric filter. This includes inspection of structural and filter integrity.  
[40 CFR 63.373a(b)(1)]

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

**Permit Amendment No.**  
**3691-089-0012-S-05-2**

**Page 2 of 5**

**NEW CONDITION**

- 4.5 If it is not possible to take the corrective actions specified in 40 CFR 60.373a(b)(3)(i) through 40 CFR 60.373a(b)(3)(iv) for a process or fabric filter control device, the Permittee shall keep at least one replacement fabric filter onsite at all times for that process or fabric filter control device. The characteristics of the replacement filters must be the same as the current fabric filters in use or have characteristics that would achieve equal or greater emission reductions.  
[40 CFR 63.373a(b)(2)]

**5. Monitoring**

**NEW CONDITION**

- 5.8 The Permittee shall install, calibrate, operate, and maintain a pressure drop monitoring device for each of the control devices listed in permit condition to measure the differential pressure drop across the fabric filter during all times when the process is operating.  
[40 CFR 63.373a(b)(3)]

- a. Lead Oxide Baghouses (Source Codes: B1 through B8)
- b. Ventilation Baghouse (Source Code: DC1)
- c. Formation Room (Source Codes: ME3, ME4, ME5, and ME6)
- d. Battery Manufacturing Baghouses (Source Codes: BH1 through BH4)

If the results of the most recent performance test indicate that emissions from any equipment listed in this permit condition are greater than 50 percent of the applicable lead limits in 40 CFR 60.372a(a)(1) through 40 CFR 60.372a(a)(6), the pressure drop must be recorded at least twice per day (at least 8 hours apart).

If the results of the most recent performance test indicate that emissions from any equipment listed in this permit condition are less than 50 percent of the applicable lead limits in 40 CFR 60.372a(a)(1) through 40 CFR 60.372a(a)(6), the pressure drop must be recorded at least once per day.

The Permittee shall perform and retain a record suitable for inspection or submittal utilizing the operation and maintenance checks of operation of the units controlled by baghouses B1 through B8, DC1, and BH1 through BH4 (a checklist or other similar log may be used for this purpose).

If a pressure drop is observed outside of the normal operational ranges as specified by the manufacturer for any of the equipment listed in this condition, the Permittee shall record the incident and take immediate corrective actions. The Permittee shall submit an excess emissions and continuous monitoring system performance report and summary report required under 40 CFR 60.375a(c). The Permittee shall also record the corrective actions taken and verify pressure drop is within normal operational range. These corrective actions may include but not be limited to those provided in 40 CFR 60.373a(b)(3)(i) through 40 CFR 60.373a(b)(3)(iv).

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

**Permit Amendment No.**  
**3691-089-0012-S-05-2**

**Page 3 of 5**

**NEW CONDITION**

- 5.9 In lieu of the monitoring specified in Condition 5.8, the Permittee shall conduct visible emissions observations using EPA Method 9 or EPA Method 22 while the applicable process is in operation to verify that no visible emissions are occurring at the discharge point to the atmosphere.  
[40 CFR 63.373a(b)(4)]

If the results of the most recent performance test indicate that emissions from any equipment listed in this Condition 5.9 are greater than 50 percent of the applicable lead limits in 40 CFR 60.372a(a)(1) through 40 CFR 60.372a(a)(6), the visible emissions must be recorded at least twice per day (at least 8 hours apart).

If the results of the most recent performance test indicate that emissions from any equipment listed in this Condition 5.9 are less than 50 percent of the applicable lead limits in 40 CFR 60.372a(a)(1) through 40 CFR 60.372a(a)(6), the visible emissions must be recorded at least once per day.

The Permittee shall perform and retain a record suitable for inspection or submittal utilizing the operation and maintenance checks of operation of the units controlled by baghouses B1 through B8, DC1, and BH1 through BH4 (a checklist or other similar log may be used for this purpose).

If visible emissions per the requirements of this condition are detected, the Permittee shall record the incident and submit this information in an excess emissions and continuous monitoring system performance report and summary report required under 40 CFR 60.375a(c) and take immediate corrective action. The Permittee shall also record the corrective actions taken. These corrective actions may include, but are not limited to, those provided in 40 CFR 60.375a(b)(3)(i) through 40 CFR 60.375a(b)(3)(iv).

## **6. Performance Testing**

**NEW CONDITION**

- 6.11 Within 180 days of startup of the equipment included in Application Number 28665, the Permittee shall conduct or cause to be conducted a performance test for the determination of lead emissions from the grid casting facility, paste mixing facility, other lead-emitting sources baghouses, and ventilation baghouse (Source Codes: BH1, BH2, BH3, BH4 and DC1). The Permittee shall record the rate of battery production (in batteries per hour) during the performance tests. The results of the performance tests shall be submitted to the Division within 60 days of the completion of testing. Annual performance testing as required by Permit Condition 6.6 shall be conducted thereafter.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

**Permit Amendment No.**  
**3691-089-0012-S-05-2**

**Page 4 of 5**

**7. Notification, Reporting and Record Keeping Requirements**

NEW CONDITION

- 7.8 The Permittee shall provide written notification to the Division within 60 days of the installation and operation of the new equipment proposed in Application Number 28865.  
[391-3-1-.03(2)(c)]

NEW CONDITION

- 7.9 The Permittee shall keep the records specified in 40 CFR 60.375a(a)(1) through 40 CFR 60.375a(a)(7) and maintain them in a format readily available for review onsite for a period of 5 years.  
[40 CFR 63.375a(a)]

NEW CONDITION

- 7.10 Beginning on April 24, 2023, within 60 days after the date of completing each performance test or demonstration of compliance as required Permit Condition 6.11, the Permittee shall submit the results of the performance test following the procedures specified in 40 CFR 60.375a (b)(1) through 40 CFR 60.375a(b)(3).  
[40 CFR 63.375a(b)]

NEW CONDITION

- 7.11 The Permittee shall submit a report of excess emissions and monitoring systems performance report and summary report according to 40 CFR 60.7(c) and 40 CFR 60.7(d) to the Division semiannually. Report the number of failures to meet an applicable standard in 40 CFR 60 Subpart KKa. For each instance, report the date, time, cause, and duration of each failure. For each failure, the report shall include a list of the affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions. The Permittee shall use the appropriate spreadsheet template on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/cedri>) for 40 CFR 60, Subpart KKa. The date report templates become available will be listed on the CEDRI website. The report shall be submitted by the deadline specified in 40 CFR 60, Subpart KKa, regardless of the method in which the report is submitted. Submit all reports to the EPA via CEDRI, which can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The EPA will make all the information submitted through CEDRI available to the public without further notice. Per 40 CFR 60.375a(b)(3), the Permittee shall not use CEDRI to submit information the Permittee claims as CBI. Anything submitted using CEDRI cannot later be claimed CBI. If the Permittee claims CBI, the Permittee shall submit the report following description in 40 CFR 60.375a (b)(3). The same file with the CBI omitted shall be submitted to CEDRI as described in 40 CFR 60.375a.  
[40 CFR 63.375a(c)]

NEW CONDITION

- 7.12 If the Permittee is required to electronically submit a report through CEDRI in the EPA's CDX, the Permittee may assert a claim of EPA system outage for failure to timely comply with that reporting requirement. To assert a claim of EPA system outage, the Permittee shall meet the requirements outlined in 40 CFR 60.375a(d)(1) through 40 CFR 60.375a(d)(7).  
[40 CFR 63.375a(d)]

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

**Permit Amendment No.  
3691-089-0012-S-05-2**

**Page 5 of 5**

**NEW CONDITION**

- 7.13 If the Permittee is required to electronically submit a report through CEDRI in the EPA's CDX, the Permittee may assert a claim of force majeure for failure to timely comply with that reporting requirement. To assert a claim of force majeure, the Permittee must meet the requirements outlined in 40 CFR 60.375a(e)(1) through 40 CFR 60.375a(e)(5).  
[40 CFR 63.375a(e)]

**NEW CONDITION**

- 7.14 Any records required to be maintained by 40 CFR 60 Subpart KKa that are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the Division or the EPA as part of an on-site compliance evaluation.  
[40 CFR 63.375a(f)]