



ARKANSAS

ENERGY & ENVIRONMENT

January 21, 2021

Via email to: dennis.heard@stryten.com & First Class Mail

Dennis Heard
Plant Manager
GNB Fort Smith LLC
4115 South Zero
Fort Smith, AR 72903

Re: Notice of Final Permitting Decision; Permit No. 0288-AR-16

Dear Mr. Heard,

After considering the application, any public comments, and other applicable materials as required by APC&EC Reg.8.211 and Ark. Code Ann. § 8-4-101 *et seq.*, this notice of final permitting decision is provided for:

GNB Fort Smith LLC
4115 South Zero
Fort Smith, AR 72903

Permit Number: 0288-AR-16

Permitting Decision: approval with permit conditions as set forth in final Permit No. 0288-AR-16

Accessing the Permitting Decision and Response to Comments, if any:
<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/0288-AR-16.pdf>.

Accessing the Statement of Basis:
<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/0288-AR-16-SOB.pdf>.

The permitting decision is effective on the date stated in the attached Certificate of Service unless a Commission review has been properly requested under Arkansas Pollution Control & Ecology Commission's Administrative Procedures, Regulation No. 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8. Such a request shall be in the form and manner

required by Reg.8.603, including filing a written Request for Hearing with the Commission secretary at 3800 Richards Rd, North Little Rock, Arkansas 72117. If you have any questions about filing the request, please call the Commission at 501-682-7890.

This permit is your authority to construct, operate, and maintain the equipment and control apparatus as set forth in your application initially received on 9/23/2020.

Sincerely,

A handwritten signature in black ink, appearing to read "William K. Montgomery", with a horizontal line extending to the right.

William K. Montgomery
Associate Director, Office of Air Quality, Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure: Certificate of Service

CERTIFICATE OF SERVICE

I, Cynthia Hook, hereby certify that the final permit decision notice has been mailed by first class mail to GNB Fort Smith LLC, 4115 South Zero, Fort Smith, AR, 72903, on this 21st day of January, 2021.

A handwritten signature in cursive script that reads "Cynthia Hook".

Cynthia Hook, AA, Office of Air Quality



DIVISION OF ENVIRONMENTAL QUALITY


MINOR SOURCE AIR PERMIT

PERMIT NUMBER: 0288-AR-16

IS ISSUED TO:
GNB Fort Smith LLC
4115 South Zero
Fort Smith, AR 72903
Sebastian County
AFIN: 66-00212

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DIVISION OF ENVIRONMENTAL QUALITY'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. § 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



William K. Montgomery
Associate Director, Office of Air Quality
Division of Environmental Quality

January 21, 2021

Date

GNB Fort Smith LLC
Permit #: 0288-AR-16
AFIN: 66-00212

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List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	Arkansas DEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: GNB Fort Smith LLC

AFIN: 66-00212

PERMIT NUMBER: 0288-AR-16

FACILITY ADDRESS: 4115 South Zero
Fort Smith, AR 72903

MAILING ADDRESS: 4115 South Zero
Fort Smith, AR 72903

COUNTY: Sebastian County

CONTACT NAME: Dennis Heard

CONTACT POSITION: Plant Manager

TELEPHONE NUMBER: (479) 646-8341

REVIEWING ENGINEER: Kyle Crane

UTM North South (Y): Zone 15: 3910335.1 m

UTM East West (X): Zone 15: 373851.82 m

Section II: INTRODUCTION

Summary of Permit Activity

GNB Fort Smith LLC owns and operates a lead-acid battery manufacturing facility in Fort Smith, Arkansas. This modification is to:

- Add a Casting process involving lead casting of all post seal products including tining station, lead pot, re-melt pot, and drossing. Emissions from this process are accounted for under the existing SN-58 Baghouse;
- Add a Coating process involving adding a coating to all lead casting posts to provide a seal between lead and injection molded plastic. Emissions from this process are accounted for under the existing SN-54 Non-Point Source Emissions and Specific Condition #7;
- Add a Plasticizing process as an A-13 Insignificant Activity;
- Modify the Helium Leak Tester process that is currently an A-13 Insignificant Activity;
- And add an Induction Welding process as an A-7 Insignificant Activity.

The permit's general conditions were updated. Annual permitted emissions do not change with this modification.

Process Description

The manufacturing of lead-acid batteries begins with two casting operations. The post casting and the grid casting operations both have a small gas-fired lead melting pot where lead ingots, also known as pigs, are melted and the temperature is maintained a few degrees above the melting point. By maintaining the lead close to the melting point, lead vapor emissions are minimized. In the post casting operation, the lead is manually poured by ladle into the mold. After cooling, the mold is opened and the part removed. Some post castings include a bus bar for attaching the plates. Grid casting is a similar operation. The grid is a thin frame with two lugs on one end or side. The center of the frame is made up of several stringers running from side to side and from top to bottom forming a rectangular grid, thus the name. In the next operation, a positive paste is prepared by mixing powdered lead oxide, water, and sulfuric acid. The same ingredients, in slightly different proportions, plus an expander, make a negative paste. After the paste is properly mixed in the pasting machine, a grid is placed in the machine where a quantity of paste is pressed into the voids of the grid. The grid passes under a roller which insures that the paste fills the voids and is of uniform thickness. The pasted grid is now called a plate. The plate passes through an oven where the paste is dried. Upon leaving the pasting machine, the plates are hung on a mobile rack.

When the rack is filled with plates, it is placed in one of the curing ovens. The paste in the plates is cured after several hours at an elevated temperature.

The post and the plates are the only battery components fabricated at this facility. The acid, the battery case, the case top, and the plate insulators are purchased. The assembly operation begins with plate stacking. The plates are stacked in an alternating positive and negative arrangement

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with insulating material between the plates. In the burning process, a torch is used to weld all the positive plate lugs to the positive post bus bar. The process is repeated for the negative plates and post. At this point, the plate assemblies destined for dry batteries, those to be shipped without acid, are sent to the charging area. The top and the posts are welded in place on the batteries to be shipped “wet,” with acid. The battery is filled with acid and the top is plugged, becoming a sealed unit.

The wet batteries, those filled with acid, are connected to a charging unit. The batteries are charged and discharged twice and then charged a third time. This cycling of the battery improves the life of the battery. This operation requires a week to complete.

The facility also manufactures posts for Absolyte GP, GX, and SVRLA battery groups. This involves a casting process for lead casting of all post seal products (emissions accounted for under SN-58), a coating process using tDCE for all lead casting posts to provide a seal between lead and injection molded plastic (emissions accounted for under SN-54), a plasticizing process (A-13 Insignificant Activity) for over-molding of posts, leak testing (A-13 Insignificant Activity) for posts, and induction welding (A-7 Insignificant Activity) of intermediate parts to produce final posts.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective March 14, 2016
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective October 10, 2019
NSPS Subpart KK, <i>Standards of Performance for Lead-Acid Battery Manufacturing Plants</i>

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Total Allowable Emissions

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	19.38	84.34
PM ₁₀	19.38	84.34
PM _{2.5}	See Note*	
SO ₂	0.6	0.6
VOC	12.2	18.2
CO	2.0	8.0
NO _x	2.5	10.2
Lead	0.96	3.91
H ₂ SO ₄	0.2	0.8

*PM_{2.5} limits are source specific, if required. Not all sources have PM_{2.5} limits.

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Section III: PERMIT HISTORY

Permit **#288-A** was issued to Gould Inc. in 1975. Gould proposed to install equipment for the control of particulate matter and fume emissions formed during the manufacture of lead-acid industrial batteries.

Permit **#288-AR-1** was issued to GNB Technologies Inc. (GNB) on April 14, 1987.

Permit **#288-AR-2** was issued to GNB on August 25, 1987. This permit allowed the installation of two new lead melting pots and a new dust collector.

Permit **#288-AR-3** was issued to GNB on July 25, 1991. This permit allowed the installation of a new pasting machine, the routing of the flash dryer to another source, modifications of SN-01 and SN-02, and an increase in the production of absolyte batteries.

Permit **#288-AR-4** was issued to GNB on June 11, 1992. This permit allowed the re-routing of some emissions, the installation of several new sources, and the reactivation of an old source.

Permit **#288-AR-5** was issued to GNB on October 15, 1993. This permit allowed the reconfiguration of duct work and control equipment, the installation of SN-51, and other changes related to processes and the control equipment for each process.

Permit **#288-AR-6** was issued to GNB on June 2, 1994. This permit allowed the installation of new sources and an increase in production.

Permit **#288-AR-7** was issued to GNB on January 23, 1997. In this permit, the plant underwent an equipment rearrangement in the production area. GNB eliminates some outdated product assembly lines and replaced them with assembly lines for new products. All equipment processing lead would now be vented to a baghouse.

Permit **#288-AR-8** was issued to GNB on September 30, 1998. This permit allowed several changes: an increase in the emission rates at several baghouses, a baghouse realignment, the modification of non-point source emissions, the installation of a new grid casting machine, and the correction of some emission rates due to a previous calculation error.

Permit **#288-AR-9** was issued to GNB on November 18, 1999. This de minimis modification included the following changes: (1) The construction of two new automated plate cleaning lines at the positive and negative pasting lines. The emissions of particulate matter and lead from SN-53 were increased as a result of this addition. (2) The construction of one new natural gas fired boiler (SN-55) for the curing ovens, each with a heat input capacity of 3.4 MMBtu/hr.

Permit **#288-AR-10** was issued to GNB on April 21, 2000. This de minimis modification included the following changes: (1) The construction and operation of six new plate curing ovens. The six new curing ovens are controlled by the existing Absolyte Assembly Area Baghouse and exhaust via SN-51. Each unit has a heat input capacity of 0.15 MMBtu/hr. (2)

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Relocation of an existing lead melt pot. The existing lead pot was moved from the casting department (controlled by a baghouse and exhausting via SN-04) to the Absolyte Assembly Area (controlled by a baghouse and exhausting via SN-51).

Permit #**288-AR-11** was issued to GNB on June 13, 2001. With this de minimis modification, GNB installed two grid casters, two melt pots and two oxide silos. The two oxide silos are controlled by the existing Paste Mixing and Curing Baghouse and exhaust via SN-03. The emissions of lead and particulate matter from SN-03 did not increase. The two grid casters and the two melt pots are controlled by the existing Curing Ovens, Oxide Unloading, Casting Baghouse and exhaust via SN-04. The total exhaust flow rate from SN-04 did not increase; however, the carbon monoxide emissions increased by 0.6 tons/yr and the nitrogen oxides emissions increased by 0.7 tons/yr. Emissions of other pollutants did not increase. The new grid casters, melt pots, and oxide silos are subject to all applicable requirements of 40 CFR Part 60 Subpart KK.

Permit #**288-AR-12** was issued to Exide Technologies on January 30, 2002. With this de minimis modification, Exide Technologies installed an additional dust collector, reconstructed the existing duct work, rerouted the emissions from the existing production equipment to different collection devices, and modified and/or replaced two baghouses. Total allowable emissions increased 4.8 tons/year of PM/PM₁₀ and 0.33 tons/year of lead. Total allowable emissions decreased 0.4 tons/year of volatile organic compounds and 6.7 tons/year of nitrogen oxides.

Permit #**288-AR-13** was issued to Exide Technologies on November 21, 2002. With this modification, Exide did the following:

1. removed the PDQ area and its associated burn box, and rerouted the ventilation from the existing M assembly area to SN-01; the N assembly area remained ducted and controlled by SN-02;
2. installed three new natural gas curing ovens, each with a heat input capacity of 150,000 Btu/hr, and one plate boxing back-draft hood (SN-04);
3. installed four new natural gas curing ovens (approximately 285 ft³/min each), each with a heat input capacity of 150,000 Btu/hr (SN-51), removed the Absolyte Line 1 ventilation duct (to be rerouted to SN-53), added the ventilation ductwork from Absolyte Line 3 (to be rerouted from SN-53), and added a burn box each to Absolyte Lines 2 and 3 (two burn boxes total);
4. removed the Absolyte Line 3 ventilation ducts (which was rerouted to SN-51), added the ventilation ductwork from Absolyte Line 1 (which was rerouted from SN-51), and added one burn box to Absolyte Line 1 (SN-51); and
5. reconfigured the melting and casting operation to replace outdated equipment (added four new grid casters) at SN-56.
6. was authorized to stack test the nine baghouses for lead and PM/PM₁₀ emissions every five years instead of every year.

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Total allowable emissions increased by 0.5 tons/year of PM/PM₁₀, 0.1 tons/year of sulfur dioxide, 0.9 tons/year of nitrogen oxides, 0.1 tons/year of volatile organic compounds, 2.6 tons/year of carbon monoxide, and 0.08 tons/year of lead.

Permit **#288-AR-14** was issued to Exide Technologies on December 15, 2008. With this modification, Exide replaced two existing grid casters with a new WIRTZ 450 grind casting machine and added an automated stacking system for assembly of flooded type lead-acid batteries. The new grid casting machine emissions were added to an existing baghouse (SN-56); PM/PM₁₀ and lead increased by less than 0.1 tpy for each pollutant. The new stacking system emissions were added to an existing baghouse (SN-01); emissions from this “Flooded Robotic System” were 0.1 tpy of lead and 1.31 tpy of PM/PM₁₀. These limits were based on the maximum capacity of the equipment and 8760 hours per year of operation; therefore, no additional recordkeeping was necessary to demonstrate compliance with these limits.

Permit **#288-AR-15** was issued to Exide Technologies on September 12, 2017. This modification was to add SN-58 (a 60,000 cfm baghouse for Mixing, Pasting, and Oxide Unloading) as well as to update the emission rates/factors for both PM and PM₁₀ across the plant. Permitted emissions increases were 36.54 tpy of both PM and PM₁₀, and 0.67 tpy of lead.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.19.501 *et seq.* and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy	Max gr/dscf
01	M and H Assembly Line (18,407 dry scfm)	PM ₁₀	1.18	5.18	0.0075
		Lead	0.07	0.24	0.00033
02	TekMax Automatic Plate Stacker (18,407 dry scfm)	PM ₁₀	1.18	5.18	0.0075
		Lead	0.06	0.23	0.00033
03	Paste Mixing and Curing (18,407 dry scfm)	PM ₁₀	1.18	5.18	0.0075
		Lead	0.06	0.25	0.00033
04	Curing Ovens, Oxide Unloading, and Casting (18 Ovens, 4 Grid Casters) (6.0 MMBtu/hr for all sources) (18,407 dry scfm)	PM ₁₀	1.18	5.18	0.0075
		SO ₂	0.1	0.1	
		VOC	0.1	0.2	
		CO	0.3	1.1	
		NO _x	0.3	1.3	
		Lead	0.05	0.19	0.000274
11	Boiler (2.0 MMBtu/hr)	PM ₁₀	0.1	0.2	
		SO ₂	0.1	0.1	
		VOC	0.1	0.1	
		CO	0.1	0.2	
		NO _x	0.2	0.9	
37	Pasting Area (16,566 dry scfm)	PM ₁₀	1.06	4.66	0.0075
		Lead	0.05	0.22	0.00035
51	Absolyte Assembly Area (4 lead pots @ 0.8 MMBtu/pot) (24 ovens @ 0.15 MMBtu/oven) (55,222 dry scfm)	PM ₁₀	3.4	14.7	0.0075
		SO ₂	0.1	0.1	
		VOC	0.1	0.2	
		CO	0.6	2.5	
		NO _x	0.7	3.0	
		Lead	0.17	0.69	0.00032
53	MST Assembly Area (60,000 actual cfm)	PM ₁₀	3.4	15.1	0.0075
		Lead	0.16	0.67	0.00032

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SN	Description	Pollutant	lb/hr	tpy	Max gr/dscf
54	Non-Point Source Emissions	VOC	11.6	17.3	
55	Boiler (6.8 MMBtu/hr)	PM ₁₀	0.2	0.4	
		SO ₂	0.2	0.2	
		VOC	0.2	0.2	
		CO	0.6	2.6	
		NO _x	0.8	3.0	
56 (52a)	Grid Casting (13 lead pots) (0.8 MMBtu/hr per pot) (40,000 actual cfm)	PM ₁₀	1.6	6.81	0.0075
		SO ₂	0.1	0.1	
		VOC	0.1	0.2	
		CO	0.4	1.6	
		NO _x	0.5	2.0	
		Lead	0.07	0.26	0.000176
57	Mixing, Pasting, and Oxide Unloading (40,000 actual cfm)	PM ₁₀	1.5	6.65	0.0075
		Lead	0.11	0.49	0.00035
58	Mixing, Pasting, Oxide Unloading (Baghouse, 60,000 cfm)	PM ₁₀	3.4	15.1	0.0075
		Lead	0.16	0.67	0.00032

2. The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy	Max gr/dscf
01	M and H Assembly Line (18,407 dry scfm)	PM	1.18	5.18	0.0075
02	Tek Max Automatic Plate Stacker (18,407 dry scfm)	PM	1.18	5.18	0.0075
03	Pasting, Mixing and Curing (18,407 dry scfm)	PM	1.18	5.18	0.0075
04	Curing Ovens, Oxide Unloading, and Casting (18 Ovens, 4 Grid Casters)	PM	1.18	5.18	0.0075

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SN	Description	Pollutant	lb/hr	tpy	Max gr/dscf
	(6.0 MMBtu/hr for all sources) (18,407 dry scfm)				
11	Boiler (2.0 MMBtu/hr)	PM	0.1	0.2	
37	Pasting Area (16,566 dry scfm)	PM	1.06	4.66	0.0075
47	No. 1 Acid Storage Tank (3000 gallons)	H ₂ SO ₄	0.1	0.4	
48	No. 2 Acid Storage Tank (3000 gallons)	H ₂ SO ₄	0.1	0.4	
51	Absolyte Assembly Area (4 lead pots @ 0.8 MMBtu/pot) (24 ovens @ 0.15 MMBtu/oven) (55,222 dry scfm)	PM	3.4	14.7	0.0075
53	MST Assembly Area (60,000 actual cfm)	PM	3.4	15.1	0.0075
55	Boiler (6.8 MMBtu/hr)	PM	0.2	0.4	
56 (52a)	Grid Casting (13 lead pots @ 0.8 MMBtu/hr) (7 grid casting systems @ 0.025 MMBTU/hr) (40,000 actual cfm)	PM	1.6	6.81	0.0075
57	Mixing, Pasting, and Oxide Unloading (40,000 actual cfm)	PM	1.5	6.65	0.0075
58	Mixing, Pasting, Oxide Unloading (Baghouse, 60,000 cfm)	PM	3.4	15.1	0.0075

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Limit	Regulatory Citation
01, 02, 03, 04, 37, 47, 48, 51, 53, 54, 56, 57, and 58	0%	Reg.18.501
11 and 55	5%	Reg.18.501

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation 18, if the emission of the air contaminant constitutes air pollution within the meaning of Ark. Code Ann. § 8-4-303. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Reg.18.901 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. Natural gas shall be the only fuel used for the combustion sources at this facility. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311 and Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
7. The permittee shall not use in excess of 34,584 lb of VOC per twelve consecutive months. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall maintain records which demonstrate compliance with Specific Condition #7. These records shall be kept on site, updated by the last day of the following month and provided to Department personnel upon request. [Reg.19.705 and 40 C.F.R. § 52 Subpart E]

Control Equipment

9. The equipment, control apparatus and emission monitoring equipment shall be operated within their design specifications as described in the permit application at all times and shall be maintained in good condition at all times. [Reg.19.303 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

- A. The lead oxide unloading building shall be maintained in good and weather-tight condition. All doors shall remain closed during the lead oxide transfer to the silos.
- B. All nine baghouses (SN-01, SN-02, SN-03, SN-04, SN-37, SN-51, SN-53, and SN-56, and SN-57) shall be operated according to the vendor's specifications at all times. They shall be inspected as necessary, but not less than once per month, to insure that they are in good working condition. Maintenance records shall be kept on site at all times and shall be made available to Department personnel upon request.
- C. The Department reserves the right to add additional pollution control requirements as needed.

NSPS Subpart KK

- 10. Exide Technologies is subject to and shall comply with all applicable provisions of NSPS Subpart KK - Standards of Performance for Lead-Acid Battery Manufacturing Plants. A copy of Subpart KK is provided in Appendix A. [Reg.19.304 and 40 C.F.R. § 60.370]

Testing

- 11. The permittee shall conduct a compliance test on all ten baghouses (SN-01, SN-02, SN-03, SN-04, SN-37, SN-51, SN-53, SN-56, SN-57, and SN-58) within one testing period as defined in Subpart KK. The stack shall be tested for lead and PM/PM₁₀. EPA Reference Method 12, as found in 40 CFR Part 60 Appendix A, shall be used for lead. EPA Reference Method 5, with inclusion of the back half sampling train particulate, as found in 40 CFR Part 60 Appendix A, shall be used for PM/PM₁₀. A testing period shall not exceed ten working days. At least one compliance test shall be conducted every five calendar years. There shall be no more than sixty-two months between any two compliance tests. The 5-year testing cycle shall commence with the stack testing event scheduled for November 2002. [Reg.19.702 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- 12. This testing shall be used to demonstrate compliance with the gr/dscf and lb/hr limits of each of the ten baghouses. The annual emission limits are based on the maximum capacity of the baghouse. [Reg.19.702 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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Section V: INSIGNIFICANT ACTIVITIES

The Division of Environmental Quality deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and Regulation 19 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated September 24, 2020. [Reg.19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
20 Lead Pots (NG fired at 0.8 MM BTU/hr each)	A-1
2 Linburg ovens (0.5 MM Btu/hr each)	A-1
Milling machine, drill press, grinder, sander at electrical test lab	A-5
23 Battery Chargers Area	A-5
Induction Welding	A-7
Sink Station	A-13
Heat Sealer	A-13
Helium Leak Tester	A-13
Finishing and Pack Operation	A-13
Shop Size Glass Bead Blaster	A-13
Milling and Sawing of Post at Casting Operation	A-13
Plasticizing	A-13

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
3. The permittee shall notify the Division of Environmental Quality in writing within thirty (30) days after each of the following events: commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Reg.19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Reg.19.410(B) and/or Reg.18.309(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee must keep records for five years to enable the Division of Environmental Quality to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Division of Environmental Quality may use the records, at the discretion of the Division of Environmental Quality, to determine compliance with the conditions of the permit. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Division of Environmental Quality electronically using <https://portal.adeq.state.ar.us> or mail them to the address below. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Division of Environmental Quality
Office of Air Quality

GNB Fort Smith LLC
Permit #: 0288-AR-16
AFIN: 66-00212

ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Division of Environmental Quality. The permittee must notify the Division of Environmental Quality of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Division of Environmental Quality within sixty (60) calendar days after the completion of testing. [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall provide: [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Reg.19.303 and/or Reg.18.1104 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Division of Environmental Quality may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Reg.19.601 and/or Reg.18.1101 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Division of Environmental Quality that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, overnight delivery, or online at <https://portal.adeq.state.ar.us>) to the Division of Environmental Quality by the

- end of the next business day after the occurrence or the discovery of the occurrence.
- c. The permittee must submit to the Division of Environmental Quality, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.
11. The permittee shall allow representatives of the Division of Environmental Quality upon the presentation of credentials: [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
 12. The Division of Environmental Quality issued this permit in reliance upon the statements and presentations made in the permit application. The Division of Environmental Quality has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 13. The Division of Environmental Quality may revoke or modify this permit when, in the judgment of the Division of Environmental Quality, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Reg.19.410(A) and/or Reg.18.309(A) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Division of Environmental Quality and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Division of Environmental Quality denies the request to transfer within thirty (30) days of the receipt of the

disclosure statement. The Division of Environmental Quality may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Reg.19.407(B) and/or Reg.18.307(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Reg. 18 and/or Reg. 19 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [Ark. Code Ann. § 8-1-105(c)]
19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Division of Environmental Quality approval. The Division of Environmental Quality may grant such a request, at its discretion in the following circumstances:
 - a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Reg.18.314(A) and/or Reg.19.416(A), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Division of Environmental Quality approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:
 - a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;

- d. The request contains such information necessary for the Division of Environmental Quality to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
- e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
- f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Reg.18.314(B) and/or Reg.19.416(B), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Division of Environmental Quality approval. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Reg.18.314(C) and/or Reg.19.416(C), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

22. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [Reg.18.1001, Reg.19.701, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

Appendix A

NSPS 40 C.F.R. Part 60 Subpart KK – *Standards of Performance for Lead-Acid Battery
Manufacturing Plants*

Subpart KK—Standards of Performance for Lead-Acid Battery Manufacturing Plants

§60.370 Applicability and designation of affected facility.

(a) The provisions of this subpart are applicable to the affected facilities listed in paragraph (b) of this section at any lead-acid battery manufacturing plant that produces or has the design capacity to produce in one day (24 hours) batteries containing an amount of lead equal to or greater than 5.9 Mg (6.5 tons).

(b) The provisions of this subpart are applicable to the following affected facilities used in the manufacture of lead-acid storage batteries:

- (1) Grid casting facility.
- (2) Paste mixing facility.
- (3) Three-process operation facility.
- (4) Lead oxide manufacturing facility.
- (5) Lead reclamation facility.
- (6) Other lead-emitting operations.

(c) Any facility under paragraph (b) of this section the construction or modification of which is commenced after January 14, 1980, is subject to the requirements of this subpart.

§60.371 Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

(a) *Grid casting facility* means the facility which includes all lead melting pots and machines used for casting the grid used in battery manufacturing.

(b) *Lead-acid battery manufacturing plant* means any plant that produces a storage battery using lead and lead compounds for the plates and sulfuric acid for the electrolyte.

(c) *Lead oxide manufacturing facility* means a facility that produces lead oxide from lead, including product recovery.

(d) *Lead reclamation facility* means the facility that remelts lead scrap and casts it into lead ingots for use in the battery manufacturing process, and which is not a furnace affected under subpart L of this part.

(e) *Other lead-emitting operation* means any lead-acid battery manufacturing plant operation from which lead emissions are collected and ducted to the atmosphere and which is not part of a grid casting, lead oxide manufacturing, lead reclamation, paste mixing, or three-process operation facility, or a furnace affected under subpart L of this part.

(f) *Paste mixing facility* means the facility including lead oxide storage, conveying, weighing, metering, and charging operations; paste blending, handling, and cooling operations; and plate pasting, takeoff, cooling, and drying operations.

(g) *Three-process operation facility* means the facility including those processes involved with plate stacking, burning or strap casting, and assembly of elements into the battery case.

§60.372 Standards for lead.

(a) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere:

(1) From any grid casting facility any gases that contain lead in excess of 0.40 milligram of lead per dry standard cubic meter of exhaust (0.000175 gr/dscf).

(2) From any paste mixing facility any gases that contain in excess of 1.00 milligram of lead per dry standard cubic meter of exhaust (0.000437 gr/dscf).

(3) From any three-process operation facility any gases that contain in excess of 1.00 milligram of lead per dry standard cubic meter of exhaust (0.000437 gr/dscf).

(4) From any lead oxide manufacturing facility any gases that contain in excess of 5.0 milligrams of lead per kilogram of lead feed (0.010 lb/ton).

(5) From any lead reclamation facility any gases that contain in excess of 4.50 milligrams of lead per dry standard cubic meter of exhaust (0.00197 gr/dscf).

(6) From any other lead-emitting operation any gases that contain in excess of 1.00 milligram of lead per dry standard cubic meter of exhaust (0.000437 gr/dscf).

(7) From any affected facility other than a lead reclamation facility any gases with greater than 0 percent opacity (measured according to Method 9 and rounded to the nearest whole percentage).

(8) From any lead reclamation facility any gases with greater than 5 percent opacity (measured according to Method 9 and rounded to the nearest whole percentage).

(b) When two or more facilities at the same plant (except the lead oxide manufacturing facility) are ducted to a common control device, an equivalent standard for the total exhaust from the commonly controlled facilities shall be determined as follows:

$$S_e = \sum_{a=1}^N S_a (Q_{sd_a} / Q_{sd_T})$$

Where:

S_e = is the equivalent standard for the total exhaust stream.

S_a = is the actual standard for each exhaust stream ducted to the control device.

N = is the total number of exhaust streams ducted to the control device.

Q_{sda} = is the dry standard volumetric flow rate of the effluent gas stream from each facility ducted to the control device.

Q_{sdt} = is the total dry standard volumetric flow rate of all effluent gas streams ducted to the control device.

[47 FR 16573, Apr. 16, 1982, as amended at 65 FR 61760, Oct. 17, 2000]

§60.373 Monitoring of emissions and operations.

The owner or operator of any lead-acid battery manufacturing facility subject to the provisions of this subpart and controlled by a scrubbing system(s) shall install, calibrate, maintain, and operate a monitoring device(s) that measures and records the pressure drop across the scrubbing system(s) at least once every 15 minutes. The monitoring device shall have an accuracy of ± 5 percent over its operating range.

§60.374 Test methods and procedures.

(a) In conducting the performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b).

(b) The owner or operator shall determine compliance with the lead standards in §60.372, except §60.372(a)(4), as follows:

(1) Method 12 or Method 29 shall be used to determine the lead concentration (C_{pb}) and, if applicable, the volumetric flow rate (Q_{sda}) of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 0.85 dscm (30 dscf).

(2) When different operations in a three-process operation facility are ducted to separate control devices, the lead emission concentration (C) from the facility shall be determined as follows:

$$C = \left[\sum_{a=1}^n (C_a Q_{sda}) \right] / \sum_{a=1}^n Q_{sda}$$

Where:

C = concentration of lead emissions for the entire facility, mg/dscm (gr/dscf).

C_a = concentration of lead emissions from facility "a", mg/dscm (gr/dscf).

Q_{sda} = volumetric flow rate of effluent gas from facility "a", dscm/hr (dscf/hr).

N = total number of control devices to which separate operations in the facility are ducted.

(3) Method 9 and the procedures in §60.11 shall be used to determine opacity. The opacity numbers shall be rounded off to the nearest whole percentage.

(c) The owner or operator shall determine compliance with the lead standard in §60.372(a)(4) as follows:

(1) The emission rate (E) from lead oxide manufacturing facility shall be computed for each run using the following equation:

$$E = \left(\sum_{i=1}^M C_{P_{bi}} Q_{sd_i} \right) / (PK)$$

where:

E = emission rate of lead, mg/kg (lb/ton) of lead charged.

$C_{P_{bi}}$ = concentration of lead from emission point "i," mg/dscm (gr/dscf).

Q_{sd_i} = volumetric flow rate of effluent gas from emission point "i," dscm/hr (scdf/hr).

M = number of emission points in the affected facility.

P = lead feed rate to the facility, kg/hr (ton/hr).

K = conversion factor, 1.0 mg/mg (7000 gr/lb).

(2) Method 12 or Method 29 shall be used to determine the lead concentration ($C_{P_{bi}}$) and the volumetric flow rate (Q_{sd_i}) of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 0.85 dscm (30 dscf).

(3) The average lead feed rate (P) shall be determined for each run using the following equation:

$$P = N W / \Theta$$

where:

N = number of lead pigs (ingots) charged.

W = average mass of a pig, kg (ton).

Θ = duration of run, hr.

[54 FR 6675, Feb. 14, 1989, as amended at 65 FR 61760, Oct. 17, 2000; 79 FR 11250, Feb. 27, 2014]