



November 18, 2019

Mr. Michael Verzwyvelt
Source Evaluation Section
Bureau of Air Quality
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

**Re: Notification of Stack Testing
Clarios, LLC
Permit No. 1040-0129-CA, CB, CC, and CD**

Dear Mr. Verzwyvelt:

Clarios, LLC (Clarios) – Florence Recycling Center, operates a secondary lead smelting facility under Permit No. 1040-0129-CA, CB, CC and CD, located in Florence, South Carolina. The facility is subject to 40 CFR 63, Subpart X – National Emissions Standard for Hazardous Air Pollutants (NESHAPs) from Secondary Lead Smelting. The construction permits and Subpart X require initial performance testing for lead emissions and subsequent annual testing for all applicable sources. Based on previous stack testing completion dates, the next round of tests will be conducted in December 2019 in accordance with Subpart X and Permit CA, Section C. Source Test Schedule, including the following:

Table 1 – Required Compliance Testing

Required Test Date	Source	Pollutants
December 2019	Unit 01 – CX Scrubber	Lead, PM, SAM
	Unit 02 – CX FEU Vent	Lead
	Unit 06 – Melter & Charge Prep	Lead
	Unit 07 – Furnace 1	Lead, SO ₂
	Unit 08 – Furnace 2	Lead, SO ₂
	Unit 09 – Furnace 3	Lead, SO ₂
	Unit 10 – Foundry Ventilation	Lead
	Unit 11a – Refining Kettles (Process)	Lead, CO, SO ₂
	Unit 11b – Refining Kettles (Combustion)	CO
	Unit 12 – Refinery FEU Vent	Lead
Unit 14 – Slag Warehouse	Lead, PM	

Unit 11 – Refining Kettles Request

Clarios operates a total of nine (9) kettles for lead refining. The purpose of the refining kettles is to adjust the concentrations of various metals in the lead product by alloying or by removing impurities. Each kettle has two (2) indirect-fired natural gas burners with a combined heat input

rating of 9.58 MMBtu/hr. After refining in the kettles, the molten lead is poured into ingots and other finished lead products in the casting areas located adjacent to the refining kettles.

There are two (2) separate stacks for the refining kettle and ventilation process. The process emissions from the kettles and casting area are captured by a hood system and routed to a baghouse for control of particulate and lead emissions (Stack ID RB1). Combustion emissions from the refining kettles are routed to a separate stack (Stack ID R1). Stack RB1 and R1 have each been tested for CO and SO₂ every two (2) years since initial stack testing. As emissions from Stack R1 represent only emissions from combustion of pipeline-supplied natural gas, Clarios requests a variance in testing schedule and to cease SO₂ testing from Stack R1. Instead of using a calculated emission factor in units of pounds of SO₂ per ton of lead ingot produced, Clarios requests to use the AP-42 Section 1.4 *Natural Gas Combustion* emission factor of 0.6 lb/10⁶ scf to estimate SO₂ emissions from the refining kettle combustion source.

Stack Test Plan

Clarios is required to submit a site-specific test plan at least sixty (60) days prior to the proposed test date as required by 40 CFR 63 Subpart X. However, if the only amendments to the previously approved test plan are to facility information, the before mentioned notification requirement does not apply and Clarios is required to submit the amendments at least two (2) weeks prior to the proposed test date [SC Regulation 61-62.1 Section IV.B.5.b].

The content of the site specific test plans previously submitted to South Carolina Department of Health and Environmental Control (SC DHEC) in October 2014 with comments addressed in November 2014, and December 2014. A revision was submitted in November 2018 to remove building differential pressure data language and add AMP language. The same approach and test methods will be used as noted in the November 2018 version. Clarios plans to conduct a source test during the weeks of December 9 and December 16, 2019. An amended site-specific test plan will be submitted to SC DHEC, in accordance with SC Regulation 61-62.1 Section IV.B.5.b, two (2) weeks prior to the proposed test dates.

If you have any questions about the included information, please contact me at 843.673.5170 or Robert VandenMeiracker with TRC at 864.787.5261.

Sincerely,

Matt Hieshetter
Environmental Relations Manager, Clarios

cc: Melissa Bitter, Director, Environmental Compliance – Components, Clarios
Robert vandenMeiracker, TRC