



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

August 28, 2014

Ms. Lizzette Danner
Johnson Controls Battery Group, Inc.
1800 Paper Mill Road
Florence, SC 29501

Re: CX Scrubber (ID 01), Foundry Ventilation (ID 10), and Slag Warehouse (ID 14) Metals Emissions Testing – Conducted March 18-26, 2014

Dear Ms. Danner:

On May 12, 2014, the Department received the referenced source test reports for the Johnson Controls Battery Group, Inc. (JCI) battery recycling plant located in Florence, SC. A review of the reports indicated that JCI omitted a substantial amount of required production and parametric monitoring information from the report. Neither the source test plan nor the source test results indicated that JCI intended for these tests to be used to demonstrate compliance with 40CFR 63, Subpart X; however, JCI's Notification of Compliance Status (NOCS) dated May 22, 2014, states that these tests were intended to demonstrate compliance with Subpart X. Department Source Evaluation Section personnel determined that with additional supplemental information the test may have the information necessary to be satisfactory for Subpart X compliance. On July 29, 2014, the Department requested the missing and supplemental data from JCI. On August 18, 2014, the Department received the requested information. After review of the additional data, the Department has determined the following:

During the source test of the CX Scrubber in the Battery Breaker area, the scrubber pressure drop readings indicated that the scrubber operated at both positive and negative pressure drops. 40 CFR 63.548(i) requires JCI to establish pressure drop ranges during initial or compliance tests. Department personnel contacted JCI to explain this fluctuation. On August 25, 2014, JCI indicated a possible gauge malfunction as an explanation to the positive and negative readings. A malfunction in the pressure drop gauge would lead to incorrect scrubber parameters being established. As a result, the Department rejects the results of this test as invalid.

During the source tests of both the Foundry Ventilation and Slag Warehouse stacks, JCI failed to maintain the total enclosure negative pressure in the range required by 40 CFR 63, Subpart X. In accordance with 40 CFR 63.544(c)(1) to demonstrate compliance with the standard for differential pressure, you must maintain the pressure in total enclosures such that the average pressure in any 15-minute period does not fall below 0.013 mm of mercury (0.007 inches of water). As a result, the Department rejects the results of these tests as invalid.

Additionally, since these tests are invalid, these sources have failed to demonstrate compliance with Subpart X as required by 40 CFR 63.546 Compliance Dates. This matter is being referred to the Bureau of Air Quality Enforcement Section for resolution.

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D. Williams to L. Danner

JCI must correct problems with any malfunctioning equipment and/or parametric monitoring devices and then conduct retests on the referenced sources which demonstrate compliance with 40 CFR 63, Subpart X, and its permit as soon as possible. A revised test plan must be submitted that addresses the tests are to be conducted to satisfy the requirements of Subpart X. These retests must be conducted in accordance with SC Regulation 61-62.1, Section IV – Source Tests.

If I can be of further assistance, please do not hesitate to call me at (803) 898-0834 or e-mail me at williadt@dhec.sc.gov.

Sincerely,



Derek T. Williams
Environmental Health Manager
Source Evaluation Section
SC DHEC Bureau of Air Quality

Cc: Compliance file 1040-0129

Ec: Michael Shroup, BAQ
David Meekins, BAQ
Dawn Jordan, BAQ
Eve Leitzsey, BAQ
Christopher Hardee, BAQ
James Myers, BAQ
Heinz Kaiser, BAQ
Mary Peyton Wall, BAQ
Curt Branham, BAQ
Randy Stewart, BAQ
Bryan Baxley, Pee Dee Region – Florence EQC