

Application Review

Issue Date:

Region: Asheville Regional Office
County: Burke
NC Facility ID: 1200076
Inspector's Name: Harold Brady
Date of Last Inspection: 12/04/2018
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Saft America Inc.</p> <p>Facility Address: Saft America Inc. 313 Crescent Street Valdese, NC 28690</p> <p>SIC: 3692 / Primary Batteries, Dry And Wet NAICS: 335912 / Primary Battery Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 2Q .0513 NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): Yes Other: N/A</p>
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Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> <p>Michael McGuire Environmental Health and Safety Manager (828) 874-4111 313 Crescent Street Valdese, NC 28690</p>	<p style="text-align: center;">Authorized Contact</p> <p>Richard Boyens General Manager (828) 874-4111 313 Crescent Street Valdese, NC 28690</p>	<p style="text-align: center;">Technical Contact</p> <p>Michael McGuire Environmental Health and Safety Manager (828) 874-4111 313 Crescent Street Valdese, NC 28690</p>	<p>Application Number: 1200076.18B Date Received: 07/12/2018 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 04595/T15 Existing Permit Issue Date: 04/01/2014 Existing Permit Expiration Date: 03/31/2019</p>

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2017	0.1300	0.5300	80.22	0.4500	0.0100	0.2877	0.2566 [Glycol Ethers, Unlisted - Spec]
2016	0.0600	0.4600	78.61	0.4000	0.0200	0.2597	0.2289 [Glycol Ethers, Unlisted - Spec]
2015	0.0450	0.3600	51.97	0.3200	0.0200	0.0719	0.0592 [Glycol Ethers, Unlisted - Spec]
2014	0.0357	0.3700	56.15	0.3200	0.0200	0.0363	0.0252 [Glycol Ethers, Unlisted - Spec]
2013	0.1312	0.4900	106.36	0.4200	0.0300	0.1978	0.1690 [Glycol Ethers, Unlisted - Spec]

<p>Review Engineer: Alice Wessner</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue: 04595/T16 Permit Issue Date: XXXX, 2019 Permit Expiration Date: XXXX, 2019</p>
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1. Purpose of Application

Saft America, Inc. (Saft) currently holds Title V Permit No. 04595T15 with an expiration date of March 31, 2019 for a lithium sulfur dioxide battery manufacturing facility in Valdese, Burke County, North Carolina. This permit application is for a permit renewal. The renewal application was received on July 12, 2018, which is **not** nine months prior to the expiration date. Therefore, the existing permit may expire if the renewed permit is not issued by March 31, 2019. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

Saft certified that:

- (1) the current air quality permit identifies and describes all emissions units at the above subject facility, except where such units are exempted under the North Carolina Title V regulations at 15A NCAC 02Q .0500,
- (2) the current air quality permit cites all applicable requirements and provides the method or methods for determining compliance with the applicable requirements.

2. Facility Description

Saft primarily manufactures lithium sulfur dioxide batteries. The manufactured battery has carbon/aluminum cathode; a lithium metal anode; and a sulfur dioxide, lithium bromide, and acetonitrile electrolyte. The facility currently operates 16 hours per day, with one full eight-hour shift and a seasonal partially-manned shift, 5 days per week, and employs ~ 260 people. Production is currently ~550,000 Li-SO₂ cells per month (6 to 7 million cells per year) where peak production several years ago was ~75,000 cells per day. Li-MnO₂ batteries are also manufactured on site and used in communication devices.

3. History/Background/Application Chronology

April 1, 2014	Air Permit issued with an expiration date of March 31, 2019.
July 24, 2018	Received application for a TV permit renewal.
October 31, 2018	Emailed Michael McGuire of Saft requesting an update of the RMP.
November 29, 2018	Comments received from Michael McGuire of Saft.
December 6, 2018	Emailed Harold Brady of the Asheville Regional office (ARO) with questions.
December 11, 2018	Comments received from Harold Brady ARO
January 28, 2019	Comments from Booker Pullen, permitting supervisor
January 31, 2019	Comments from regional office received
February 8, 2019	Comments from Permittee received
February 11, 2019	Draft permit and permit review forwarded to public notice
XXXXXX 2019	Public comment period ends. No comments received. (one month)
XXXXXX 2019	EPA comment period ends.
XXXXXX 2019	Permit issued.

4. Permit Modification/Changes

Page(s)	Section	Description of Change(s)
Attachment to cover letter	Insignificant Activities	+ Added footnote 3 to bottom of insignificant activities list
All	All	+ Updated dates and permit revision number
	2.1 A.3	Removed requirement for 15A NCAC 02D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS from Permit 04595T15
	2.1 B.3	Removed requirement for 15A NCAC 02D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS from Permit 04595T15
8-16	3	+ Updated General Conditions to version 5.3

5. Regulatory Review:

As there were not any significant changes in the applicable regulations with the exception of 15A NCAC 02D .0958, a regulatory discussion for each regulation will not be included in this document.

The facility is currently subject to the following regulations:

15A NCAC 02D .0521, Control of Visible Emissions – The facility is subject to 02D .0521 but has no monitoring, recordkeeping, or reporting requirements for demonstrating compliance with this regulation

15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions

15A NCAC 02D .2100, Risk Management Program

15A NCAC 02Q .0317, Avoidance Conditions (for 15A NCAC 02D .0530, Prevention of Significant Deterioration)

NC General Statute, 143-215.108, Control of sources of air pollution; permits required

On November 1, 2016, amendments to 15A NCAC 02D .0902 were finalized to narrow applicability of work practice standards in 15A NCAC 02D .0958 from statewide to the maintenance area for the 1997 8-hour ozone standard. This change is being made primarily because the abundance of biogenic VOC emissions in North Carolina results in ozone formation being limited by the amount of available nitrogen oxides (NOx) emissions. Provisions of the Clean Air Act require VOC requirements previously implemented in an ozone nonattainment area prior to re-designation remain in place. However, facilities outside the maintenance area counties for the 1997 8-hour ozone standard would no longer be required to comply with the work practice standards in 15A NCAC 02D .0958. Burke County was never in nonattainment for ozone and 15A NCAC 02D .0958 is no longer applicable to facilities, including Saft, within the county. The permit condition for 15A NCAC 02D .0958 will be removed under this permit renewal.

6. NSPS, NESHAP, PSD, 112(r) and CAM:

a. NSPS

The facility is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

b. NESHAP

This facility is not a major source of HAPs. This permit renewal does not affect this status.

Boiler ID No. I-4 burns only natural gas and is therefore not subject to 40 CFR 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. Per 40 CFR 63.11195(e), gas-fired boilers are not subject to this Subpart.

c. PSD

Saft has limited facility-wide VOC emissions to less than 250 tpy in accordance with 15A NCAC 02D .0317 to maintain minor source status under the PSD program (15A NCAC 02D .0530). In 2017, total reported actual VOC emissions were 80.22 tons.

d. 112(r)

This facility is subject to 112(r) due to its sulfur dioxide storage tank (ID No. SO2TANK, 5,000-gallon capacity). As included in Section 2.3 of the revised air permit, the facility is required to submit an update to its Risk Management Plan (RMP) to EPA. An update of the plan was completed on November 9, 2018.

e. CAM

40 CFR 64 requires that a compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold and use a control device to meet an applicable standard. The following table indicates the current equipment/control device relationships:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-03	Sulfur dioxide storage area, the electrolyte mixing area, and the battery filling line	CD-03	One packed-bed caustic wet scrubber (230 gallons per minute liquid injection rate)
ES-04	Cell destruct room	CD-04	One packed-bed caustic wet scrubber (75 gallons per minute liquid injection rate)
SO2TANK	One sulfur dioxide storage tank (5,000-gallon storage capacity)	CD-03	One packed-bed caustic wet scrubber (230 gallons per minute liquid injection rate)

However, CAM does not apply as the facility is not using a control device to achieve compliance with a numerical limitation.

7. Facility-wide Air Toxics:

This permit renewal does not trigger an air toxics review.

8. Facility Emissions Review

There is no change in Title V potential emissions for this renewal. Actual emissions for 2013 – 2017 are provided in the header to this document.

9. Facility Compliance Status:

The last full inspection of this facility was completed on December 4, 2018 by Harold Brady of the ARO. At the time of the inspection, Saft “appeared to be in compliance with the applicable air quality regulations and Air Permit No. 04595T15.”

Five-year compliance history

On August 25, 2015, DAQ issued a Notice of Deficiency (NOD) to Saft for not performing monthly inspections as required by 15A NCAC 02D .0958.

On September 6, 2017, DAQ issued a NOD to Saft for deficiencies in their RMP.

All NODs have been resolved.

10. Draft Permit Review Summary:

The Asheville Regional Office was provided a draft permit and draft permit review document on January 30, 2019. ARO responded

Michael McGuire of Saft America was provided a draft permit for review on February 7, 2019. No comments were received at the time the permit was sent to notice.

U.S. EPA was provided a draft permit for review on February 11, 2019. No comments were received at the time of permit issuance.

A 30-day public notice period was initiated on February 11, 2019. No comments were received at the time of permit issuance.

11. Conclusion

Recommend issuance of Air Permit No. 04595T16.