



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

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Commissioner

AUG 01 2017

Mike Henry, Environmental Manager
Exide Technologies
2601 West Mt. Pleasant Blvd.
Muncie, IN 47302

Re: Inspection Summary Letter
Exide Technologies
Plant ID 035-00028
Muncie, Delaware County

Dear Mr. Henry:

On July 18, 2017, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Exide Technologies (Exide), located at 2601 West Mt. Pleasant Blvd in Muncie, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:

- Commitment
- Surveillance
- Complaints
- Other

Results of Inspection:

- No violations were observed.
- Violations were observed.
- Violations were observed but corrected during the inspection.
- Additional information/review is required to evaluate overall compliance.
- Violations were observed and will result in an enforcement action.

The inspection was conducted in response to two complaints:

- 1) Children of some Exide employees had exhibited Elevated Blood Lead Levels. It was determined that this was not an air emissions issue and thus was not within the purview of IDEM-OAQ. This matter may be addressed by another branch of IDEM or by another agency.

- 2) An anonymous complainant alleged that sometimes a smell coming from Exide "takes your breath away." No such odor was detected in the July 18, 2017 inspection.

Please direct any questions to me at 317-232-8441 or by email at wclark@idem.in.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Wyman Clark". The signature is fluid and cursive, with the first name "Wyman" and the last name "Clark" clearly distinguishable.

Wyman Clark, Compliance Inspector
Air Compliance Section 1
Office of Air Quality

ACES IDs: 214090 (Inspection), 212849 (Complaint), 213599 (Complaint)

**OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT**

SOURCE: Exide Technologies
 LOCATION: 2601 West Mt. Pleasant Blvd.
 CITY: Muncie
 COUNTY: Delaware

PLANT ID NUMBER: 035-00028
 INSPECTED BY: Wyman Clark
 TIME IN: 9:26 am TIME OUT: 10:19 pm
 INSPECTION DATE: 7/18/2017
 REPORTED BY: Wyman Clark
 REPORT DATE: 7/24/2017
 ACES NUMBER: 214090 (Inspection)
 TEMPO NUMBER: 74326, 74656

COMPLAINT INVESTIGATION: YES NO
 COMPLAINT NUMBER: 212849. 213599

ATTAINMENT:

NONATTAINMENT: SO₂ CO O₃ NO₂ Pb PM₁₀ PM_{2.5}

PERMIT TYPE: Part 70
 PERMIT NO: T035-36882-00028

CHECK IF APPLICABLE: NSPS NESHAP PSD OTHER (explain):
 40 CFR 60 Subpart L: Secondary Lead Smelters NSPS
 40 CFR 63 Subpart X: Lead Smelting NESHAP
 40 CFR 63 Subpart ZZZZ: Stationary Reciprocating Internal Combustion Engines NESHAP
 40 CFR 63 Subpart CCCCCC: Gasoline Dispensing Facilities NESHAP

PERSONS/TITLE INTERVIEWED:

Name	Title	Phone Number	Email
Mike Henry	Environmental Manager	765-747-9980x124	Michael.Henry@na.exide.com
Mike Aber			

OBJECTIVES:

Complaints	<input checked="" type="checkbox"/>	Surveillance	<input type="checkbox"/>
Multimedia Screening	<input type="checkbox"/>	Other:	<input type="checkbox"/>

DESCRIPTION OF SOURCE:

Stationary Secondary Lead Smelting Operation

BACKGROUND:

Permitting:

Part 70	22352	9/7/2007	Transition from FESOP
SPM	26410	9/12/2008	Alternate Method for down time calculation
AA	28360	8/25/2009	Add soda ash silo & remove a pot furnace
AA	29201	5/5/2010	Add maintenance dust collector
Part 70 Renewal	31230	8/1/2012	
SPM	33188	2/4/2014	Additional baghouses added.
SPM	34525	9/9/2014	
SSM	35751	7/9/2015	
SPM	35766	7/28/2015	

SSM SPM	36872 36882	10/5/2016 10/21/2016	RLS Compliance requirements from consent decree
Draft 2 nd Renewal	37825		Not yet issued

Enforcement: There have been no air cases in the last 5 years. Since 2006 there have been 4 air cases and 9 hazardous waste cases.

At the time of inspection there is: 1 EPA Consent Decree active.

Compliance: Inspections &/or Attempts: 5/9/2017 Commitment (Commit) Out of Compliance (OUT) Violation Letter (VL); 9/15/16 (Compliance Monitoring Strategy (CMS) – In Compliance (IN). 3/3/16 (Surveillance-IN), 8/14/2014 (CMS-IN), 2/25/14 (Partial Inspection [record review w/ EPA]-IN), 11/21/13 (Limited Inspection [weather damage]-IN), 2/7/13 (Surveillance-IN) , 6/27/12 (CMS-In) + 57 older inspections

Violations: 5/26/17 (Late stack test, magnehelic out of range, unlabeled cold cleaner degreaser); 9/19/11 (2010 ACC issue),

EPA: Record review February 25, 2014, Inspection April 2012, issue information request June 2012

PROCESS DESCRIPTIONS/FINDINGS/OBSERVATIONS:

This lead smelter has the following emissions and control units:

D.1 Emissions Unit	Control Equipment	Exhaust to
NG Rotary Dryer Unit 3	Rotary Dryer Baghouse	
Lead Reverberatory Furnace Unit 4	NG Afterburner/Process Baghouse/Parallel	
Blast Furnace (cupola) Unit 5	North and South Sodium Carbonate Packed Tower Scrubbers	
Reverberatory Furnace Charge Point Hoods	Ventilation Baghouse	
Blast Furnace Charge Point Hoods		
D.2 Emissions Unit	Control Equipment	Exhaust to
2 Lead Pig Casting Machines Unit 7	Refinery Baghouses No. 1 and 2	Separate Stacks
11 NG Pot Furnaces 6K1, 6K2, 6K 4-12		
D.3 Emissions Unit	Control Equipment	Exhaust to
Lead Battery Crusher/Breaker Unit 1	Venturi Scrubber	
Soda Ash/Caustic Soda Neutralizing Wash		
2 Soda Ash Silos Units 2a,b	Fabric Filters	
1 Soda Ash Silo Silo 3		
Materials Handling Unit 9	Bin Room Baghouses No. 1,2	Separate Stacks
Rolled Lead Strip (RLS) Line with Melting Pots MP-1 and MP-2	RLS Baghouse and HEPA Filters	

It was inspected two months ago. Since then there have been two complaints:

- ACES 212849: 3 children of Exide employees have tested for elevated blood lead levels in the past couple of years. This is not within the purview of IDEM-OAQ. It is being handled by IDEM-OLQ (Hazardous Waste). Exide has recently been inspected by IDEM-OLQ, EPA, and the Delaware County Health Department concerning this issue. I suggested that Exide review its training and procedures for employee decontamination when exiting the lead smelter building.
- ACES 213599: An anonymous complainant said "Some times there is a smell coming from Exide that it takes your breath away." Before identifying myself, I drove around the very large block around Exide. I detected no odor. I observed no particulate emissions from any visible stack. There was a substantial steam plume from one stack. Upon entry, I discussed the complaint with Mike Henry (MH) and Mike Aber (MA). They did not recall any recent instances of excess odor. MH said that sometimes there can be a sulfurous odor if the furnace oxygen level gets too low. He said they occasionally have odors from their water treatment systems. He also suggested that sometimes there are odors from Diamond Plastics (an unpermitted source located about 1/3 mile away). MH and MA accompanied me on a tour of the perimeter of the site. There were normal industrial-type smells – nothing strong. At one place I detected a faint and temporary whiff of what I thought was SO₂: there was a slight irritation in my throat. It went away before I could trace down the source.

ADDITIONAL COMMENTS:

Diamond Plastics had a fugitive dust complaint in 2006 (ACES 47427), There was no violation.

CONCLUSION(S):

There were no violations of the permit or air pollution rules determined during this inspection.

RECOMMENDATION:

- An inspection summary letter should be issued.
- Follow-up inspections should be conducted as CMS/Commitment schedules dictate.
- Both complaints should be closed with no further action.

EXIT INTERVIEW:

I explained my findings, conclusions, and recommendations to Mike Henry and Mike Aber prior to leaving the source.

ATTACHMENTS:

None.



Indiana Department of Environmental Management

TEMPO Record

Description

Incident # 74326

Received By: Frownfelter, Karla

Received Date: 06/20/2017 2:47 pm

Receipt Method: Complaint Form

Incident Description: I am not sure where the release might be coming from; the common link is simply Exide. I do not have information on specific job duties or areas of operation.

Have you talked with anybody else about your complaint? Yes

Report History:

I spoke with Theresa Pichtel about this facility as the likely source of lead contaminants that may be responsible for recently increased child lead poisoning cases.

Nature of Complaint:

I am the Director of Environmental Health at the Delaware County Health Department. Without revealing personal health information, I wish to report a recent increase in the amount of elevated blood lead level (EBLL) cases reported to the Health Dept. Several of these cases have revealed connections to the Exide plant, and we believe that this business's activities are a likely source of this lead exposure.

Date of Complaint:

ongoing

How Aware of Complaint:

The DCHD is responsible for the case management of children with EBLLs.

Incident Type: Complaint-IW Health Concerns

Occurred Date/Time: 06/20/2017 12:00 am

Regulatory Program: Hazardous Waste

Incident Status: Assigned to Staff

Resolution Desc: Wyman Clark is Air Inspector for Exide Technologies.

Location

Location Description: 2601 W Mt Pleasant Blvd

Region Code: Indianapolis Office

County: Delaware

Municipality: Muncie



Indiana Department of Environmental Management

TEMPO Record

Source Entity

Source Type: Agency Interest
Source Entity Name: Exide Corporation
Address 1: 2601 W Mount Pleasant Blvd
Municipality: Muncie
County: Delaware
State: IN
Zip Code: 47302
Telecom: Business phone number 1 765-747-9980

Reporter

Reporter Type: Other Governmental Agency
Name: Brodie Cook
Title: Director of Environmental Health
Organization: Delaware County Health Dept
State: IN
Reporter Requested: Yes
Telecom: Business phone number 1 765-587-0663
Email address 1 bcook@co.delaware.in.us

Actions

Task	Staff Assigned	Start Date	Due Date	Completed Date	Hours Spent
Enter Initial Complaint Into	Frownfelter, Karla	06/20/2017		06/20/2017	
Provide Acknowledgement	Frownfelter, Karla	06/20/2017		06/20/2017	



Indiana Department of Environmental Management

TEMPO Record

Description

Incident # 74656

Received By: Frownfelter, Karla

Received Date: 07/06/2017 1:08 pm

Receipt Method: Complaint Form

Incident Description: Some times there is a smell coming from Exide that it takes your breath away. I think they are trying to hide something.

Incident Type: Complaint-Air Odor

Occurred Date/Time: 07/06/2017 12:00 am

Regulatory Program: Air

Incident Status: Assigned to Staff

Lead Investigator: Clark, Wyman

Location

Location Description: 2601 Mt Pleasant Blvd

Region Code: Indianapolis Office

County: Delaware

Municipality: Muncie

Source Entity

Source Type: Agency Interest

Source Entity Name: Exide Corporation

Address 1: 2601 W Mount Pleasant Blvd

Municipality: Muncie

County: Delaware

State: IN

Zip Code: 47302

Telecom: Business phone number 1

765-747-9980

Reporter

Reporter Type: Anonymous



Indiana Department of Environmental Management

TEMPO Record

Actions

Task	Staff Assigned	Start Date	Due Date	Completed Date	Hours Spent
Investigate Complaint	Clark, Wyman	07/06/2017			
Enter Initial Complaint Into Comments: sent to air on 7/6	Frownfelter, Karla	07/06/2017		07/06/2017	
Provide Acknowledgement	Frownfelter, Karla	07/06/2017		07/06/2017	