To: Christenson, Kara[Christenson.Kara@epa.gov]
Cc: Harvey, Lornette[Harvey.Lornette@epa.gov]
From: BECKHAM, LISA
Sent: Thur 10/27/2016 6:37:23 PM
Subject: FW: 40 CFR Part 63, Subpart X - National Emission Standards For Hazardous Air Pollutants From Secondary Lead Smelting

Hi Kara,

Just keeping you in the loop on this.

To our knowledge, we never received anything from Exide.

Lisa Beckham

Environmental Engineer

Air Permits Office

EPA Region 9

(415) 972-3811

From: Harvey, Lornette
Sent: Thursday, October 27, 2016 11:30 AM
To: BECKHAM, LISA <BECKHAM.LISA@EPA.GOV>
Subject: FW: 40 CFR Part 63, Subpart X - National Emission Standards For Hazardous Air Pollutants From Secondary Lead Smelting

Lisa,

Fyi.

Lornette Harvey

Air Permits Office (AIR-3)

U.S. Environmental Protection Agency, Region 9

75 Hawthorne Street

San Francisco, CA 94105

(415) 972-3498 (phone) / (415) 947-3579 (fax)

Harvey.lornette@epa.gov

From: Andrew Lee [mailto:ALee@aqmd.gov]
Sent: Tuesday, September 06, 2016 1:14 PM
To: Harvey, Lornette <Harvey.Lornette@epa.gov>
Subject: RE: 40 CFR Part 63, Subpart X - National Emission Standards For Hazardous Air Pollutants From Secondary Lead Smelting

Thanks Lornette for the directions.

From: Harvey, Lornette [mailto:Harvey.Lornette@epa.gov]
Sent: Tuesday, September 6, 2016 1:10 PM
To: Andrew Lee <ALee@aqmd.gov>
Cc: Amir Dejbakhsh <adejbakhsh@aqmd.gov>; Rios, Gerardo <Rios.Gerardo@epa.gov>
Subject: Re: 40 CFR Part 63, Subpart X - National Emission Standards For Hazardous Air Pollutants From Secondary Lead Smelting

Good Morning Andrew,

I do remember our conversation about Exide Technology after the quarterly meeting and you mentioned the company is tentatively closing their Title V facility. You also mentioned that a clean up process is planned for the site after closure.

If the company wants EPA to make a determination regarding air permitting issues, please ask them to submit the request in writing to our office. They can submit the request electronically to our email address (R9AirPermits@epa.gov)or they can mail the request to the following address:

Air Permits Office (AIR-3)

U.S. Environmental Protection Agency, Region 9

75 Hawthorne Street

San Francisco, CA 94105

If you have additional questions about this subject, please call me at (415) 972-3498, or submit an email to Harvey.lornette@epa.gov or to the R9AirPermits email address.

From: Andrew Lee <ALee@aqmd.gov>
Sent: Tuesday, September 6, 2016 2:20 PM
To: Harvey, Lornette
Cc: Amir Dejbakhsh
Subject: 40 CFR Part 63, Subpart X - National Emission Standards For Hazardous Air Pollutants From Secondary Lead Smelting

Good morning Lornette,

Hope all is going well with you. On August 24, in our quarterly meeting with you and your staff, after the meeting Amir and I met with you and LaWeeda whereby I asked the question of Exide Technology and their request to know whether the facility is still obligated to meet the requirements of 40CFR 63, Subpart X – National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting even though they stopped operations in March 2014 and have since determined the facility will no longer be operational. I further explained that there are several refining kettles that contain lead that may still be able to be operated long enough to be fired and heated to a point where the lead may be poured to remove it from the premises as the kettles and the lead content are too heavy to be moved in one piece. At this point, the California Department of Toxics Substance Control (DTSC) is the lead authority on determining how the lead may be removed. At this moment DTSC has not stated how that may

occur. Therefore, based upon our conversation I had conveyed to Exide Technology's consultant that the facility is still under the requirements of the above mentioned NESHAP, Subpart X, as long as there is equipment available on the site.

The facility has made a request that I get written documentation from US EPA regarding the need for Exide Technology to continue to be under requirements of this NESHAP. Therefore, I would like some written confirmation that this is indeed the case.

Best regards,

Andrew

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Andrew Lee, P.E.

Sr. Air Quality Engineering Manager

So. Coast Air Quality Management District

21865 Copley Drive

Diamond Bar, CA 91765

(909) 396-2643
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