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
- [x] Complaints
- [ ] Other

Results of Inspection:
- [x] 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,

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 ☐ PM₂·₅ ☐

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:

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Phone Number</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mike Henry</td>
<td>Environmental Manager</td>
<td>765-747-9980x124</td>
<td><a href="mailto:Michael.Henry@na.exide.com">Michael.Henry@na.exide.com</a></td>
</tr>
<tr>
<td>Mike Aber</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

OBJECTIVES:

Complaints ☑ Surveillance ☐ Multimedia Screening ☐ Other: ☐

DESCRIPTION OF SOURCE:
Stationary Secondary Lead Smelting Operation

BACKGROUND:

<table>
<thead>
<tr>
<th>Permittion</th>
<th>Date</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part 70</td>
<td>22352 9/7/2007</td>
<td>Transition from FESOP</td>
</tr>
<tr>
<td>SPM</td>
<td>26410 9/12/2008</td>
<td>Alternate Method for down time calculation</td>
</tr>
<tr>
<td>AA</td>
<td>28360 8/25/2009</td>
<td>Add soda ash silo &amp; remove a pot furnace</td>
</tr>
<tr>
<td>AA</td>
<td>29201 5/5/2010</td>
<td>Add maintenance dust collector</td>
</tr>
<tr>
<td>Part 70 Renewal</td>
<td>31230 8/1/2012</td>
<td></td>
</tr>
<tr>
<td>SPM</td>
<td>33188 2/4/2014</td>
<td>Additional baghouses added</td>
</tr>
<tr>
<td>SPM</td>
<td>34525 9/9/2014</td>
<td></td>
</tr>
<tr>
<td>SSM</td>
<td>35751 7/9/2015</td>
<td></td>
</tr>
<tr>
<td>SPM</td>
<td>35766 7/28/2015</td>
<td></td>
</tr>
</tbody>
</table>
Exide Technologies, 035-00028, 7/18/2017 Complaint Inspection  
Page 2 of 3  

<table>
<thead>
<tr>
<th>SSM</th>
<th>36672</th>
<th>10/5/2016</th>
<th>RLS Compliance requirements from consent decree</th>
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</thead>
<tbody>
<tr>
<td>SPM</td>
<td>36882</td>
<td>10/21/2016</td>
<td>Not yet issued</td>
</tr>
<tr>
<td>Draft 2nd Renewal</td>
<td>37825</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Enforcement:** There have been no air cases in the last 5 years. Since 2006 here 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:

<table>
<thead>
<tr>
<th>D.1 Emissions Unit</th>
<th>Control Equipment</th>
<th>Exhaust to</th>
</tr>
</thead>
<tbody>
<tr>
<td>NG Rotary Dryer Unit 3</td>
<td>Rotary Dryer Baghouse</td>
<td></td>
</tr>
<tr>
<td>Lead Reverberatory Furnace Unit 4</td>
<td>NG Afterburner/Process Baghouse/Parallel</td>
<td></td>
</tr>
<tr>
<td>Blast Furnace (cupola) Unit 5</td>
<td>North and South Sodium Carbonate Packed Tower Scrubbers</td>
<td></td>
</tr>
<tr>
<td>Reverberatory Furnace Charge Point Hoods</td>
<td>Ventilation Baghouse</td>
<td></td>
</tr>
<tr>
<td>Blast Furnace Charge Point Hoods</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>D.2 Emissions Unit</th>
<th>Control Equipment</th>
<th>Exhaust to</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 Lead Pig Casting Machines Unit 7</td>
<td>Refinery Baghouses No. 1 and 2</td>
<td>Separate Stacks</td>
</tr>
<tr>
<td>11 NG Pot Furnaces 6K1, 6K2, 6K 4-12</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>D.3 Emissions Unit</th>
<th>Control Equipment</th>
<th>Exhaust to</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead Battery Crusher/Breaker Unit 1</td>
<td>Venturi Scrubber</td>
<td></td>
</tr>
<tr>
<td>Soda Ash/Caustic Soda Neutralizing Wash</td>
<td>Fabric Filters</td>
<td></td>
</tr>
<tr>
<td>2 Soda Ash Silos Units 2a,b</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 Soda Ash Silo Silo 3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Materials Handling Unit 9</td>
<td>Bin Room Baghouses No. 1,2</td>
<td>Separate Stacks</td>
</tr>
<tr>
<td>Rolled Lead Strip (RLS) Line with Melting Pots MP-1 and MP-2</td>
<td>RLS Baghouse and HEPA Filters</td>
<td></td>
</tr>
</tbody>
</table>

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.
**Description**

- **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  
Telecom: Business phone number 1  765-587-0663
Email address 1  bcook@co.delaware.in.us

Actions

<table>
<thead>
<tr>
<th>Task</th>
<th>Staff Assigned</th>
<th>Start Date</th>
<th>Due Date</th>
<th>Completed Date</th>
<th>Hours Spent</th>
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<tbody>
<tr>
<td>Enter Initial Complaint</td>
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<td>06/20/2017</td>
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<tr>
<td>Provide Acknowledgement</td>
<td>Frownfelter, Karla</td>
<td>06/20/2017</td>
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Description

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