



July 25, 2024

Mr. Dave Cline
Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
MC61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Electronic Mail: AirCompl@IDEM.IN.gov
FedEx # 7775 4424 1546

Mr. Nathan Frank
Air Enforcement & Compliance Assurance Branch
Environmental Protection Agency, Region 5
77 West Jackson Street, Mail Code AE-17J
Chicago, Illinois 60604-3507

FedEx # 7775 4420 8319

Re: Ecobat Resources Indiana, LLC NESHAPs Semi-Annual Reports

Gentlemen:

Enclosed for your review are the following reports for the period of January 1 through June 30, 2024.

- 1) Part 70 Operating Permit Certification.
- 2) Reporting required pursuant to 40 CFR 63.550(e) and 326 IAC 20-13.1.

Pursuant to 63.10(a)(4)(ii), a copy is being sent to the US EPA Region 5 Administrator.

Please contact me at 317-515-6821 or john.jones@ecobat.com should you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "J.R. Jones", with a long horizontal stroke extending to the right.

John R. Jones, P.E.
EHS Compliance Manager

Attachments



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Ecobat Resources Indiana, LLC
Source Address: 7870 West Morris Street, Indianapolis, Indiana 46231
Mailing Address: 7870 West Morris Street, Indianapolis, Indiana 46231
Part 70 Permit No.: T097-46091-00079

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☒ Certification Letter
- ☐ Test Result (specify):
- ☒ Reports (specify): 1H24 Semi-Annual NESHAPs Report
- ☐ Notification (specify)
- ☐ Affidavit (specify)
- ☐ Other (specify):

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name: Cory Bodnar

Title/Position: Vice President, Indiana Operations

Phone: 317-515-6822

Date: 07/25/2024



January - June 2024

40 CFR 63.550(e)(1) and 326 IAC 20-13.1-5

Process Vent Lead Concentrations in Vent Gases

| | <u>S-100A</u> | <u>S-101</u> | <u>S-102</u> | <u>S-103</u> | <u>S-104</u> | <u>S-105</u> | <u>S-106</u> | <u>S-107</u> | <u>S-108</u> | <u>S-109</u> | <u>WESP</u> |
|-----------------|---------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------|
| Pb (mg/dscm) | 0.0015 | 0.0027 | 0.0068 | 0.0031 | 0.0013 | 0.0045 | 0.0055 | 0.0028 | 0.0023 | 0.0019 | 0.0049 |

Flow Weighted Average Lead Concentration in Vent Gases

$$C_{FWA} = \frac{\text{Sum : } Fi \times Ci}{\text{Sum } Fi}$$

CWA = flow weighted ave. of all "process vents"
 Fi = flow rate from process vent i as measured in dscfm from latest stack test
 Ci = concentration of lead in process vent i as measured from latest stack test
Note: FWA must be \leq to 0.20 mg/dscm or 0.000087 gr/dscf

| | | |
|-----------------------------|----------|-----------------------|
| C_{FWA} | = | 0.0032 mg/dscm |
|-----------------------------|----------|-----------------------|

40 CFR 63.550(e)(2) and 326 IAC 20-13.1-5

Total Hydrocarbons in Process Vents with Established Limits

| Emission Point | THC (ppmv) |
|----------------|------------|
| DA046 | 5.6 |

40 CFR 63.550(e)(2) and 326 IAC 20-13.1-5

Total Dioxins/Furans in Process Vents with Established Limits

| Emission Point | D/F (ng/dscm) |
|----------------|---------------|
| WESP | 0.021 |



40 CFR 63.550(e)(3) and 326 IAC 20-13.1-5 Total Hydrocarbon or Lead CEMS Periods of Non-Compliance

The facility does not have a Total Hydrocarbon or Lead CEMS system in place.

40 CFR 63.550(e)(4),(5),(6) and 326 IAC 20-13.1-14 Records of Bag Leak Detection System (BLDS) Alarms, Procedures Taken Following Each BLDS Alarm, and Records Maintained as described in the SOP for BLDS and Corrective Actions

40 CFR 63.548(g) and 326 IAC 20-13.1-9 [Hazardous Air Pollutants: Secondary Lead Smelters, Bag Leak Detection System Requirements], include an exemption from the provisions of the requirement for Bag Leak Detection Systems on baghouses equipped with HEPA filters or followed by wet electrostatic precipitators (WESP) as a secondary control device. All baghouses at this facility are followed by HEPA filters or the WESP.

40 CFR 63.550(e)(7) and 326 IAC 20-13.1-14 Periods of Low Pressure Drop and Water Flow Rate for Wet Scrubbers controlling Process Fugitive Emissions

The facility does not use a wet scrubber to control these types of emissions.

40 CFR 63.550(e)(8) and 326 IAC 20-13.1-14 Low Temperature Monitoring Records

On June 10, 2019, Ecobat implemented the Alternative Monitoring Plan approved by EPA Region 5 on March 8, 2019. For this recording period, the facility has recorded no periods when the three-hour average furnace firing rate fell below the setpoint.

40 CFR 63.550(e)(9) and 326 IAC 20-13.1-14 Plastic Separation Process Certification

Ecobat Resources Indiana, LLC certifies that it operates a plastic separation process at all times the battery breaking process operates which results in separating plastic casing material from all automotive batteries prior to introducing the feed into its Reverberatory furnace.

40 CFR 63.550(e)(10), 326 IAC 20-13.1-14 Loss of Negative Pressure Records, Power Loss

| Date | Start and | End Time | Description of Power Outage and/or Exceedance above - 0.007"WC |
|------|-----------|----------|---|
| n/a | | | There were no power loss or loss of negative pressure events during this period |

40 CFR 63.550(e)(11) and 326 IAC 20-13.1-14 Malfunctions

No malfunctions were recorded during this reporting period.



40 CFR 63.550(e)(12) and 326 IAC 20-13.1-14 Fugitive Dust Control Measures Summary

The control measures in the SOP dated August 19, 2016 include, but are not limited to:

- a) total enclosure of process areas with emissions vented to a control device,
- b) paved areas cleaned at least twice per day, weather permitting,
- c) equipment washing prior to exiting the building,
- d) wet suppression of dust,
- e) maintaining the building at negative pressure while operating,
- f) collection and treatment of plant runoff on-site, and
- g) uniform vacuum stations and boot washing facilities for employees to use prior to leaving the process areas.

40 CFR 63.550(e)(13) and 326 IAC 20-13.1-14 Furnace Startup/Shutdown Report

Ecobat conducted startups and shutdowns according to the Standard Operating Procedures outlined in the Startup, Shutdown, and Malfunction Plan designed to minimize emissions of hydrocarbons.

40 CFR 63.550(e)(14) and 326 IAC 20-13.1-14 Performance Test Uploads or Submission

63.550(e)(14)(i): There were no performance tests completed during this period.