



REGION 4

ATLANTA, GA 30303

SENT VIA ELECTRONIC MAIL

Tori Ramsey
Environmental Engineer
1895 Tobacco Road
Augusta, Georgia 30906
vramsey@usbattery.com

Dear Tori Ramsey:

On May 28, 2024, the U.S. Environmental Protection Agency Region 4 Air Enforcement Branch conducted a Partial Compliance Evaluation inspection of U.S. Battery Manufacturing Company, located in Augusta, Georgia. Enclosed is the final report generated for this inspection (Enclosure)

If you have any questions, please contact me at (404) 562-9206, or by email at hughes-fairley.rosalyn@epa.gov.

Sincerely,

Rosalyn
Hughes Fairley
Rosalyn Hughes Fairley
Environmental Engineer
South Air Enforcement Section

Digitally signed by Rosalyn
Hughes Fairley
Date: 2024.07.25 15:06:14
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Enclosure

**ENCLOSURE
INSPECTION REPORT**

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report**

I. GENERAL INFORMATION

Facility Name: U.S. Battery Manufacturing Co.

Location (Address): 1895 Tobacco Road, Augusta, Georgia 30906

Inspection Date: May 28, 2024

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation

PROGRAMMATIC ID: GA000000132450162

PERMIT NUMBERS: 3691-245-0162-S-03-0

EPA Region 4 Investigator(s)/Inspector(s):

1. Rosalyn Hughes Fairley, Environmental Engineer
2. Kevin Taylor, Environmental Engineer

State/Local Investigator(s)/Inspector(s):

1. Kenneth Phillips, GEPA

Person(s) Contacted at Facility (Name and Title):

1. Victoria (Tori) Ramsey, Environmental Engineer
2. John Newsome (Records Review)

Report Prepared by: Rosalyn Hughes Fairley

FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Lead Acid Battery Manufacturing
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	3691-245-0162-S-03-0
3. Air permit issuance date.	October 21, 2014
4. Air permit expiration date.	No expiration date
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Synthetic Minor
6. Major source pollutants (if applicable).	N/A
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	State Implementation Plan NSPS Subpart KK NESHAP Subpart PPPPPP
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Process vents, stacks
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Baghouses, Dust Collector, Scrubber

B. Process Description

U. S. Battery Manufacturing Company is located at 1895 Tobacco Road in Augusta, Georgia, and manufactures lead-acid storage batteries used in golf

carts, floor scrubbers, and off grid systems. The facility is approximately 120,000 ft², consisting of the main building, the oxide plant, and battery assembly. 250 staff are employed at the facility, which runs 2- 10 hour shifts.

The facility currently operates under facility-wide emission limitations for hazardous air pollutants (HAPs) and criteria pollutants (primarily particulate matter emissions) to stay below the applicable major source levels for 40 CFR Part 63 major source applicability and 40 CFR Part 70 applicability.

The plant consists of the following areas:

- Grid Casting Area, where pig lead is melted and cast into grids for battery plates. All emissions are vented to Baghouse BH1 and Baghouse BH2 for control of lead emissions.
- Small Parts Casting Area, where pig lead is melted and cast into internal and external connection parts. All emissions are vented to a Baghouse BH2 for control of lead emissions.
- Oxide Mills, where lead oxide melt pots serve the two lead oxide production lines. Each lead oxide production line consists of a Barton Oxide Mill (OM1-OM-4), an oxide collection cyclone, and product screw conveyor. Emissions from each line are controlled by a baghouse which also serves as a product collection device.
- Pasting Department has several point sources of emissions: mixer, hopper, oven, plate racking and scrap barrels. The emissions from this area are controlled by Baghouse BH1.
- The Assembly Department has the following areas: stacking groups, burning groups together, taping and boxing the groups into the battery case, and scrap barrels. The emissions from this area are controlled by Baghouse BH2.

The facility also has sulfuric acid tanks that are controlled by a Packed Tower Acid Scrubber (PT1). The tower is used to control off gassing from the unloading of acid into the storage tanks.

II. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	EPA Region 4 (R4) and GEPD inspector arrived at the facility on May 28, 2024, at approximately 1:15 pm.
2. Credentials presented to facility personnel (include name and title).	Y	All inspectors presented their credentials to Tori Ramsey, Environmental Engineer
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	Inspectors held an opening meeting with Tori Ramsey to discuss the purpose and objectives of the inspection.
4. Discussed safety issues.	Y	Inspectors asked about the appropriate PPE.
5. Discussed which records to be reviewed.	Y	The inspection team requested to review all the records required by the permit.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	Inspectors discussed walking through the process from the beginning (where the raw materials are received) through the manufacturing/assembly process of the batteries and ending in storage area.
7. Discussed facility policy regarding photographs or video (if applicable).	Y	Region 4 inspectors indicated a camera may be used to take photographs at the facility.
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	TVA/PID were not used during the inspection.

Activity	Yes No NA	Comments
9. Discussed CBI.	Y	EPA inspectors indicated that any material claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.
Records Reviewed at the Facility		

Activity	Yes No NA	Comments
10. The types of records reviewed, and the time period reviewed.	Y	<p>March 2024 Records Battery Production – 35,026 Hourly Battery Production – 66 Lead used in pounds 1,802,300 Total Lead used in tons – 901 Lead melted in tons – 901</p> <p>March 2023 Records Battery Production – 77,197 Hourly Battery Production – 145 Lead used in pounds 2,992,720 Total Lead used in ton – 1,496 Lead melted in tons – 1,496</p> <p>Packed Scrubber Tower pH and pressure drops were reviewed for the months of July 2023 and April 2024. The pH and pressure were within the permitted range.</p> <p>Baghouse Daily pressure drops for the weeks of 01/29/2024 and 05/20/2024 were reviewed and were within the permitted ranges.</p> <p>Stack testing for the Baghouses and the Packed Tower Scrubber was conducted in March 2024. The test results have been submitted to the GEPD, but the review of the stack test, has not been completed.</p>

Activity	Yes No NA	Comments
Facility Walk-Through Observations		
<p>11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr).</p> <p>Provide the date and time the information was recorded by the inspector.</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>	N/A	<p>The State Operating Permit does not have any process operational limits. The duct work in the battery assembly building was observed during the walk through and no obvious emissions were observed.</p>

Activity	Yes No NA	Comments
<p>12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch).</p> <p>Provide the date and time the information was recorded by the inspector.</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>	N/A	
<p>13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.</p>	N/A	

Activity	Yes No NA	Comments
<p>14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.).</p> <p>(For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher).</p> <p>Provide the date and time the information was recorded by the inspector.</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>	Y	

Activity	Yes No NA	Comments
<p>15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.).</p> <p>Provide the date and time the information was recorded by the inspector.</p> <p>Identify the permit limit (if applicable).</p> <p>An attachment may be used for a large amount of information.</p>	N/A	
<p>16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.</p>	N/A	.
<p>17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).</p>	N/A	

Activity	Yes No NA	Comments
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	Y	During the inspection no fugitive emissions were observed from the duct work.
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	N	
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	

Activity	Yes No NA	Comments
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	NA	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N	The infrared camera was not used.

Activity	Yes No NA	Comments
<p>26. Was the TVA used? If so, identify the equipment monitored and the results.</p> <p>Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release.</p> <p>An attachment may be used for a large amount of information.</p>	N	EPA R4 inspectors did not use a TVA at the facility.
<p>27. Was the PID used? If so, identify how the PID was used and the results.</p> <p>Provide the date and time the information was recorded by the inspector.</p> <p>An attachment may be used for a large amount of information.</p>	N	EPA R4 inspectors did not use a PID at the facility.
Closing Meeting		
28. Conducted a closing meeting.	Y	EPA Region 4 inspectors conducted a closing meeting on May 28, 2024, at approximately 3:40 pm.

Activity	Yes No NA	Comments
29. Summarize any additional information needed, if applicable?	N	
30. Accept a declaration of CBI, if applicable?	N	Inspectors did notify the facility of the opportunity to declare information in the draft inspection report as confidential.
31. Discussed observations.	Y	Inspectors thanked facility personnel for their time and summarized inspection activities.
32. Discussed next steps, if applicable?	Y	The final inspection report from EPA Region 4 will be sent to the company within a 70-day timeframe.
33. Date and time inspection concluded.		The inspection concluded on May 28, 2024, at approximately 4:00 p.m.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	Ms. Ramsey indicated that she will be out of the office on maternity leave. The report should be sent to her manager, Eric Rueter. Mr. Rueter was not in the office the day of the inspection.

EPA Investigator/Inspector Signature: Rosalyn Hughes Fairley Digitally signed by Rosalyn Hughes Fairley
Date: 2024.07.11 11:13:45 -04'00'

EPA Supervisor Signature & Title: TODD GROENDYKE Digitally signed by TODD GROENDYKE
Date: 2024.07.25 14:14:27 -04'00'

Date Report Finalized: July 11, 2024

