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BUREAU OF AIR QUALITY

August 15, 2012

Mr. Michael Shroup, Manager Source Evaluation Section
Division of Air Compliance Management
Bureau of Air Quality
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Subject: Request for Extension to Complete Source Testing
Johnson Controls Battery Group Inc. (JCI), Florence, South Carolina
Permit No. 1040-0129-CA

Dear Mr. Shroup:

On behalf of JCI, TRC Environmental Corporation Inc. (TRC) is requesting that the South Carolina Department of Health and Environmental Control (SC DHEC) provide additional time to conduct the initial source test required in condition 58 of Air Permit No. 1040-0129-CA (air permit). This permit condition requires testing within 180 days after startup. JCI started one of the sources described in Condition 58, Emission Unit ID 03 – PP Storage and Extrusion, on May 24, 2012. Thus, testing for this unit will be required by late November 2012.

Many other sources that require source testing at the facility have not started up and JCI does not anticipate that these sources will be at full production until after September 1st, 2012. Therefore, JCI would require two separate stack testing mobilizations in order to meet requirements to conduct testing within 180 days of startup and achieve production levels representative of maximum production.

JCI would prefer to mobilize one time to conduct all of the sampling required by Condition 58. Separate mobilizations will result in increased cost and complexity for an already complex sampling program that requires testing of nine emission units and 30 individual pollutants. JCI believes that allowing synchronization of Unit ID 03 with the testing of the other sources will streamline the testing requirements of Condition 58. Since Unit ID 03 is not regulated by federal regulations such as National Emission Standards for Hazardous Air Pollutants (neither Part 61 nor Part 63) or New Source

Mr. Michael Shroup, Manager Source Evaluation Section
South Carolina Department of Health and Environmental Control
August 15, 2012
Page 2

Performance Standards (Part 60), United States Environmental Protection Agency (USEPA) approval for extension of stack testing date does not appear to be necessary.

If you have any questions, please do not hesitate to contact me at 864.234.9177. If this extension is acceptable to SC DHEC, JCI requests a written notification from SC DHEC that defers testing of Unit ID 03 until testing for the other sources is required.

Sincerely,

TRC Environmental Corporation



Robert F. vandenMeiracker, P.E.
Project Manager

cc: Kim Davis, JCI
Central Files