



TO: Brian Foster, TCEQ
FROM: Donna Lazzari, ERG
CC: Rick Baker, ERG
DATE: May 17, 2011
SUBJECT Correction to Battery Recycling Report for TCEQ

This memorandum was prepared in response to the comments received by TCEQ on May 16, 2011 on the report prepared by ERG entitled “*Comprehensive Evaluation of Air Quality Control Technologies Used for Lead-Acid Battery Recycling*”. The commenter noted that the total potential reduction of fugitive emissions from the Exide Technologies secondary lead smelting facility in Frisco, Texas as stated in the report were higher than the actual stated fugitive emissions. The reduction available from the additional fugitive control measures have been revised from 0.074 lb/hr to 0.033 lb/hr and the total reduction potential if all controls in the report are adopted has been revised from 0.502 lb/hr to 0.461 lb/hr. The overall conclusions of the report have not been changed due to this correction.

These fugitive emissions reduction potentials were calculated in a two step process. The first step was the estimation of emissions reductions possible by implementing several practices with the largest impact on fugitives. The most significant of these practices included total enclosure of the lead smelting processes and venting the processes to a control device. The second step was to estimate the potential reductions available from the fugitive emissions that would remain after these practices were implemented.

Because there is an increase in stack emissions when fugitives are captured and sent to a control device, the "net" emissions reduction from installation of total enclosures is less than the reductions in fugitive emissions. In the original report, in order to calculate the reductions possible from additional fugitive control measures, the "net" emissions reduction was subtracted from the current fugitive emissions in order to make an estimate of the amount that could be captured from the remaining fugitives. The calculation in the revised report is based upon the actual reductions in fugitive emissions rather than the "net" emissions reduction.