UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

DATE: OCT 31 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Energizer Holdings, Inc., Fennimore, Wisconsin

FROM: Dakota Prentice, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Energizer Holdings, Inc.

Facility Location: 100 Rayovac Court, Fennimore, Wisconsin

Date of Inspection: 10/21/19

EPA Inspector(s):
1. Dakota Prentice, Environmental Engineer

Other Attendees
1. Wayne Kerrigan, Safety Health and Environmental Affairs Coordinator - Energizer
2. Dean Rindy, Senior Facilities Supervisor - Energizer
3. Michael D. Vida, Plant Manager - Energizer

Contact Email Address: Wayne.Kerrigan@energizer.com

Purpose of Inspection: Determine compliance with applicable State and Federal regulations

Facility Type: Alkaline battery manufacturing

Regulations Central to Inspection: National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources, at 40 C.F.R. Part 63, Subpart VVVVVV (NESHAP VVVVVV)

Arrival Time: 1:40 PM
Departure Time: 3:20 PM

Inspection Type:
☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Credentials Presented
☒ CBI warning to facility provided

The following information was obtained verbally from Energizer Holdings representatives unless otherwise noted.

Company Ownership: In January 2019 Energizer Holdings purchased the facility. The facility was previously owned by Spectrum Brands as a part of its Rayovac battery unit.

Process Description:
The facility produces alkaline batteries. Each battery size is produced on a dedicated production line. The facility manufactures AAA, AA, C, and D sized batteries.

Battery production begins with raw material delivery, including manganese dioxide. Manganese dioxide is stored onsite at internal silos. Manganese dioxide is mixed with additional compounds, granulated, and pressed into a cathode tablet. Tablets are then placed into the battery casing, which is open on one end. A separator is added to the casing followed by an anode gel including zinc and potassium hydroxide. The battery is completed by inserting a cap with a rod into the battery opening. This cap is held in place with a volatile organic compound (VOC) containing sealant.

Staff Interview: The facility has three main baghouses and one vacuum dust collection system for particulate matter control. VOCs are controlled by a thermal oxidizer. The facility transitioned to a registration permit in approximately 2010. The facility is in the process of installing an additional battery production line.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:
EPA walked the production process from cathode mixing to battery labelling and observed the thermal oxidizer.

Photos and/or Videos: were taken during the inspection.
See Appendix A.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Requested documents:

- Most recent performance test conducted at the thermal oxidizer

Compliance Assistance: EPA used an infrared camera designed to identify VOCs during the tour of production areas of the plant. EPA informed Energizer representatives that the infrared camera did not detect VOCs during the tour.

Concerns: EPA informed Energizer representatives that the facility may be subject to the requirements of NESHAP VVVVVV.

SIGNATURES

Report Author: _____ Date: 10/25/19

Section Chief: _____ Date: 10/31/19

APPENDICES AND ATTACHMENTS

1. Appendix A - Photo Log
2. Confidential Business Information Attachment

Facility Name: Energizer Holdings, Inc.
Facility Location: 100 Rayovac Court, Fennimore, Wisconsin
Date of Inspection: 10/21/19

APPENDIX A: DIGITAL IMAGE LOG

1. **Inspector Name:** D. Prentice	2. **Date(s) of Inspection:** 10/21/19
3. **Company/Facility Name:** Energizer Holdings, Inc.	4. **Street Address, City, State:** 100 Rayovac Court, Fennimore, Wisconsin
5. **Number of Images:** 3	6. **Archival Record Location:** CD-R labelled as "Energizer - Fennimore, WI Photo Log"

Image Number	File Name	Date and Time (incl. time zone and DST)	Description of Image
1	PA210001.JPG	2019:10:21 14:50:19	Cathode Mixing
2	PA210002.JPG	2019:10:21 14:57:23	Accumulation Table - AA Line
3	PA210003.JPG	2019:10:21 15:11:17	Thermal Oxidizer