

September 11, 2015

CN: 15279

Mr. Edwin L. Pupka
 Senior Enforcement Manager
 Office of Engineering and Compliance
 South Coast Air Quality Management District
 21865 Copley Drive
 Diamond Bar, CA 91765

SOUTH COAST AQMD
 CLERK OF THE BOARDS
 '15 SEP 11 P2:15

**PROJECT: EXIDE TECHNOLOGIES FACILITY ID NO. 124868,
 ORDER OF ABATEMENT CASE NO. 3151-32**
RE: WEEKLY STATUS REPORT # 52 (9/3/15 – 9/9/15)

Dear Mr. Pupka,

Tetra Tech Inc. is pleased to present the following Weekly Status Report for the above referenced project. This report covers the period of September 3, 2015 through September 9, 2015.

CURRENT ACTIVITIES WHERE PREVIOUSLY APPROVED MITIGATION MEASURES WERE FULLY IMPLEMENTED

Major items of work performed by Exide and/or its contractor(s) (including specific mitigation measures) during this reporting period where mitigation measures were observed to be implemented in full compliance with the previously approved mitigation measures under the Mitigation Plan for RCRA RFI Sampling, and Other Plant Activities or other Mitigation Plans, as approved by the SCAQMD, at the site during this period include:

TASK ID	Major Work Item	Mitigation Measure(s)
2a	Dust Removal	Total Enclosure Building Under Negative Pressure
EX83/4	RCRA RFI Soil Sampling	Total Enclosure Building Under Negative Pressure
EX 94	2 nd Round Feed Room Soil Sampling	Total Enclosure Building Under Negative Pressure

Dust Removal

National Response Corporation (NRC) resumed dust removal activities on Thursday, September 3, 2015, in the Blast Furnace Feed Room area. NRC used a vacuum truck (Vehicle License No. 7M95594) which has a valid SCAQMD Various Locations Permit for lead abatement (Permit No. G33129 A/N 568775).

Dust removal activities are generally complete and decontamination of NRC's equipment will continue through the next reporting period.

Tetra Tech personnel were onsite to observe work performed by NRC in the total enclosure building. Verification activities included:

- Visual observation of the dust removal process for fugitive dust within the total enclosure building.
- Verification that the total enclosure building was maintained under negative pressure and vented to operational air pollution control equipment during all dust removal activities.
- Verification that the SCAQMD Various Locations Permit was present for the vacuum truck HEPA vacuum and that filters were certified with a minimum efficiency of 99.97% for capture of 0.3 micron particles.

RCRA RFI Soil Sampling

Advanced Geoscience and their subcontractors Cascade Drilling, and Avocet continued RCRA RFI Soil Sampling at offsite locations to the west that are not under oversight by Tetra Tech Inc. On Thursday, September 3, 2015 Cascade Drilling and Avocet continued onsite drilling activities using the additional Rotosonic drill rig to complete the installation of monitoring well CB-1 located in the Bag House Row portion of the Total Enclosure Building. Activities included coring through the asphalt, advancing a hand auger to a depth of 5 feet to verify utility clearance, advancing the boreholes to depths greater than 5 feet using a Rotosonic drill rig, collection of soil samples, and installation of groundwater monitoring wells. Soil and asphalt cuttings were placed into 55-gallon drums within a temporary enclosure. RCRA RFI Soil Sampling will continue into the next reporting period at off-site locations.

Verification activities included:

- Visual observation of the RCRA RFI Soil Sampling for fugitive dust within the total enclosure building.
- Verification that the total enclosure building was maintained under negative pressure and vented to operational air pollution control equipment during all RCRA RFI Soil Sampling activities.

Soil Sampling – 2nd Round Feed Room Enclosure

Advanced Geoscience and their subcontractors Cascade Drilling, Advanced Construction, and Avocet resumed the second round of soil sampling in the feed room enclosure on Tuesday September 8, 2015. Advanced Construction began saw cutting and coring through the concrete floor at locations marked for trenches and borings respectively. All soil sampling activities were completed within the Total Enclosure Building during this reporting period. The second round of soil sampling beneath the feed room floor will continue into the next reporting period.

Verification activities included:

- Visual observation of the second round of feed room floor soil sampling for fugitive dust within the total enclosure building.

- Verification that the total enclosure building was maintained under negative pressure and vented to operational air pollution control equipment during all feed room floor soil sampling activities.

CURRENT ACTIVITIES WHERE A DEVIATION FROM PREVIOUSLY APPROVED MITIGATION MEASURES WERE OBSERVED AND THE CORRECTIVE ACTIONS TAKEN

Major items of work performed by Exide and/or its contractor(s) (including specific mitigation measures) currently under way or completed during this reporting period where for each of the activities described below, mitigation measures were implemented which to some extent deviated from the previously approved mitigation measures under the Mitigation Plan for RCRA RFI Sampling, and Other Plant Activities or other Mitigation Plans, as approved by the SCAQMD:

TASK ID	Major Work Item	Deviation(s)	CORRECTIVE ACTION
None			

In general accordance with the Order for Abatement Case No. 3151-32 Findings and Decision, air monitoring, if required, was conducted during a portion of all repair work performed within the temporary enclosures on a daily basis. If the results of continuous Dust Trak air monitoring detected excessive dust, additional suppression activities are required to be implemented. For this reporting period, Dust Trak monitoring did not detect excessive dust being generated from repair activities.

Activity Which Resulted in Excessive Dust	Additional Suppression Activity
None	None

ACTUAL vs. FORECAST PROGRESS:

Exide Technologies submitted a schedule which outlines the tasks needed to be completed in response to this abatement order. The attached Gant Chart shows scheduled progress for all activities planned for the upcoming two week period. The following table shows the status of these activities.

TASK	STATUS
Dust Removal	Ongoing
RCRA RFI Soil Sampling	Ongoing
2 nd Round Feed Room Soil Sampling	Ongoing

WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
Sept. 10 – Sept. 16	<ul style="list-style-type: none">• Dust Removal Continues• RCRA RFI Soil Sampling Continues• 2nd Round of Feed Room Floor Sampling Continues

Week	Anticipated Activities
Sept. 17 - Sept. 23	<ul style="list-style-type: none">• Dust Removal Completes• RCRA RFI Soil Sampling Continues• 2nd Round of Feed Room Floor Sampling Continues

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

- o None at this time.

WORKER SAFETY CONCERNS:

The following Health and Safety issues, as they apply to Tetra Tech employees, were observed during this reporting period:

- o None.

POTENTIAL CHANGES AND ACTION ITEMS REQUIRING RESOLUTION:

The following items require resolution:

- o None at this time.

SUMMARY:

The summary provided herein covers the activities for the period of September 3, 2015 through September 9, 2015. Please note that no work occurred on Monday, September 7, 2015 in observance of Labor Day. Please find attached a copy of Exide's upcoming two weeks schedule and site map identifying the location of the activities on the upcoming two weeks schedule.

Should you have questions regarding this report, or require additional information, please contact me at your earliest convenience.

Sincerely,

Alison Kosak for

Nick Somogyi
Project Engineer

ATTACHMENTS:
Gant Chart Schedule
Site Map

Gant Chart Schedule

Project Schedule

Week of 8/31/15 – 9/23/15

Rev: 9/10/2015



Recycling Division, Vernon, CA

Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	8/28/2015			09/05/15			09/12/15			09/19/15											
							31	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20
2a	Dust Removal for Structure	Total Enclosure	354 days	9/29/14	9/18/15	99%																					
Ex72	Clearing of Assorted Materials in Total Enclosure	Total Enclosure	406 days	1/20/14	12/31/15	72%																					
Ex76	Various Work Methods in Total Enclosure	Total Enclosure	405 days	1/21/14	12/31/15	72%																					
4	RCRA RFI Soil Sampling	General	234 days	2/18/15	10/10/15	80%																					
Ex83	RFI Soil Sampling Supplemental	General	234 days	2/18/15	10/10/15	80%																					
Ex94	2nd Round Feed Room Soil Sampling	General	208 days	3/9/15	10/31/15	50%																					

*Numbering system correlates with Mitigation plan document.
Ex refers to additional work part of Sec. 6b in the Mitigation plan document.*

Site Map



Mitigation Project Map Layout

Week 8/31/15 – 9/23/15

Rev: 9/10/15

- 2a. Dust Removal
- 4. RCRA RFI Soil Sampling
- Ex 83. RFI Soil Sampling Supplemental
- Ex 72. Cleaning of Assorted Materials in Total Enclosure
- Ex 76. Various Work Methods in Total Enclosure
- Ex 94. 2nd Round Feed Room Soil Sampling.

Numbering system correlates with Mitigation plan document. Ex refers to additional work part of Sec. 6b in the Mitigation plan document.

Mitigation Schedule and Map_091015.pptx

