

July 31, 2015

SOUTH COAST AQMD  
CLERK OF THE BOARDS

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

'15 JUL 31 P1:23

**PROJECT: EXIDE TECHNOLOGIES FACILITY ID NO. 124868,  
ORDER OF ABATEMENT CASE NO. 3151-32**  
**RE: WEEKLY STATUS REPORT # 46 (7/23/15 – 7/29/15)**

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 July 23, 2015 through July 29, 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
EX 33	Building Negative Pressure Monitoring Upgrade	Use of Self Tapping Screws, Pre-Cleaning of Area
EX83/4	RCRA RFI Soil Sampling	Temporary Enclosure Under Negative Pressure
EX 94	2 <sup>nd</sup> Round Feed Room Soil Sampling	Total Enclosure Building Under Negative Pressure
EX 97	Removal and Shipment of Blast Feed	Total Enclosure Building Under Negative Pressure
EX 100	Removal and Shipment of Tin and Antimony Dross	Total Enclosure Building Under Negative Pressure
EX 103	Removal and Shipment of Lead Dross and Plates	Total Enclosure Building Under Negative Pressure*

\* Dust Trak monitoring performed for this work item.

**Tetra Tech BAS, Inc.**

1360 Valley Vista Drive, Diamond Bar, CA 91765  
Tel 909.860.7777 Fax 909.860.8017 www.tetrattech.com

### Dust Removal

Dust removal is currently on hold, but will be scheduled and conducted on an as needed basis.

### Building Negative Pressure Monitoring Upgrade

Exide completed installation of alarms and upgrades to monitoring displays in CP-2 on July 24, 2015.

### RCRA RFI Soil Sampling

Advanced Geoscience and their subcontractors Cascade Drilling, and Avocet continued RCRA RFI Soil Sampling at offsite locations that are not under oversight by Tetra Tech Inc. RCRA RFI Soil Sampling activities on the Exide property are anticipated to resume in mid to late August.

### Soil Sampling – 2<sup>nd</sup> Round Feed Room Enclosure

Advanced Geoscience did not complete any soil sampling activities within the Total Enclosure Building during this reporting period. The second round of soil sampling beneath the feed room floor will resume in a future reporting period.

### Removal and Shipping of Blast Feed

Exide did not remove or ship any blast feed during this reporting period. Exide will resume shipment of the blast feed once they have completed the removal and shipment of Lead Dross and Plates.

### Removal and Shipment of Tin and Antimony Dross

Exide personnel continued shipment of the drummed Tin Dross to Conesus in Terrell, TX, on Thursday, July 23, 2015. The pallets of Tin Dross drums were loaded onto van trailers at the Blue Lead MRO Warehouse dock in the West Yard of the facility. Once loaded, the trailers were taken through the West Yard truck wheel wash unit, scaled and dispatched through the Bandini Boulevard gate. A total of 5 trucks of Tin Dross were shipped to Conesus during this reporting period.

Verification activities included:

- Visual observation witnessed loading and shipment of 1 truck of Tin Dross on July 23, 2015, 1 truck of Tin Dross on July 24, 2015, 1 truck of Tin Dross on July 27, 2015, and 2 trucks of Tin Dross on July 29, 2015.

### Removal and Shipping of Lead Dross and Plates

Removal and shipment of Lead Dross and Plates continued on Thursday, July 23, 2015. Exide inspected the “end dump” trailers when they arrived at the site to verify that they were in good working condition and met Exide’s Pre-Loading Checklist requirements. The trailers passed inspection and were lined with a 6-mil polypropylene liners, ensuring that the liners were dimensioned adequately (length and width) to fashion “burrito” type wrappings of the material after loading. Once lined, each trailer was driven into the Total Enclosure Building and loaded; the feed material burrito wrapped and then secured with duct tape; the trailer covered with a tarp; and the truck and trailer decontaminated prior to exiting the Total Enclosure Building. A total of 7 “end dump” trailers passed inspection, were loaded with Lead Dross and Plates, and shipped to the Doe Run facility in Boss,

MO or to Exide's Munsee, IN facility during this reporting period. Removal and shipment of Lead Dross and Plates will continue into the next reporting period. No shipment of Lead Dross and Plates occurred on Friday, July 24, 2015, and Monday, July 27, 2015 so that Exide could remove plastic sheeting, paper, plastic wrap and some pieces of concrete that were comingled with the Lead Dross and Plates stockpile. The trash was removed and shipment resumed on July 28, 2015.

Verification activities included:

- Upwind and Downwind Dust Trak monitoring at the entrance/exit to the Total Enclosure Building. Review of Dust Trak data did not indicate that work associated with the removal and shipment of Lead Dross and Plates was generating fugitive dust emissions when exiting the Total Enclosure Building.
- Confirmation that negative pressure was maintained by checking the gauge on the Total Enclosure Building.
- Visual observation of each phase of the removal and shipment of Lead Dross and Plates including: the pre-loading inspection, installation of 6-mil poly lining, loading of blast feed, application of water mist to reduce fugitive dust generated during the loading process, sealing of the burrito wrap, placement of the tarp on the trailer, truck and trailer decontamination, and wheel wash.
- Visual observation witnessed 1 shipment on July 23, 2015, 6 shipments on July 28, 2015.

**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 – on hold
Building Negative Pressure Monitoring Upgrade	Complete
RCRA RFI Soil Sampling	Ongoing – off site
2 <sup>nd</sup> Round Feed Room Soil Sampling	Ongoing – on hold
Removal and Shipment of Blast Feed	Ongoing – on hold
Removal and Shipment of Tin and Antimony Dross	Ongoing
Removal and Shipment of Lead Dross and Plates	Ongoing

**WORK SCHEDULED DURING THE UPCOMING PERIOD:**

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
July 30 – August 5	<ul style="list-style-type: none"> <li>• Dust Removal On Hold</li> <li>• RCRA RFI Soil Sampling Continues Offsite</li> <li>• 2<sup>nd</sup> Round of Feed Room Floor Sampling On Hold</li> <li>• Removal and Shipment of Blast Feed Continues</li> <li>• Removal and Shipment of - Tin and Antimony Dross Continues</li> <li>• Removal and Shipment of Lead Dross and Plates Continues</li> </ul>

Week	Anticipated Activities
August 6 - August 12	<ul style="list-style-type: none"><li>• Dust Removal On Hold</li><li>• RCRA RFI Soil Sampling Continues Offsite</li><li>• 2<sup>nd</sup> Round of Feed Room Floor Sampling Continues</li><li>• Removal and Shipment of Blast Feed Continues</li><li>• Removal and Shipment of - Tin and Antimony Dross Continues</li><li>• Removal and Shipment of Lead Dross and Plates Continues</li></ul>

**KEY MILESTONES:**

The following key milestones were achieved during this reporting period:

- o Building Negative Pressure Monitoring Upgrade COMPLETE

**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 July 23, 2015 through July 29, 2015. 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,



Nick Somogyi  
Project Engineer

ATTACHMENTS:  
Gant Chart Schedule  
Site Map  
Field Monitoring Data

## **Gant Chart Schedule**

# Project Schedule

## Week of 7/23/15 – 8/12/15

*Rev: 7/30/2015*



Recycling Division, Vernon, CA

Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	07/24/15							07/31/15					08/07/15						
							23	24	25	26	27	28	29	30	31	01	02	03	04	05	06	07	08	09	10
2a	Dust Removal for Structure	Total Enclosure	336 days	9/29/14	8/31/15	85%																			
Ex72	Cleaning of Assorted Materials in Total Enclosure	Total Enclosure	284 days	1/20/14	8/31/15	88%																			
Ex76	Various Work Methods in Total Enclosure	Total Enclosure	283 days	1/22/14	8/31/15	88%																			
Ex33	Building Negative Pressure Monitoring Upgrade	General	235 days	12/1/14	7/24/15	100%																			
4	RCRA RFI Soil Sampling	General	198 days	2/18/15	9/4/15	65%																			
Ex83	RFI Soil Sampling Supplemental	General	198 days	2/18/15	9/4/15	65%																			
Ex94	2nd Round Feed Room Soil Sampling	General	175 days	3/9/15	8/31/15	40%																			
Ex97	Removal & Shipment of Blast Feed*	Blast Furnace Feed Room	81 days	5/25/15	8/14/15	50%																			
Ex100	Removal Sn Sb Dross	Blast Furnace Feed Room	44 days	7/1/15	8/14/15	80%																			
Ex103	Removal & Shipment of Drosses & Plates	Blast Furnace Feed Room	30 days	7/15/15	8/14/15	40%																			

\* - (Ex-97) Blast Feed refers to Reverb Slag & Cast Iron.

\*\* - (Ex-101) Stopped removing Loose Lead per DTSC; considered "Closure activity."

*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\_073015.pptx



## **Site Map**

# EXIDE<sup>®</sup>

## TECHNOLOGIES

### Mitigation Project Map Layout

**Week 7/23/15 – 8/12/15**

**Rev: 7/30/15**

**2a. Dust Removal**

**Ex 33. Building Negative Pressure Monitoring Upgrade**

**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. 2<sup>nd</sup> Round Feed Room Soil Sampling**

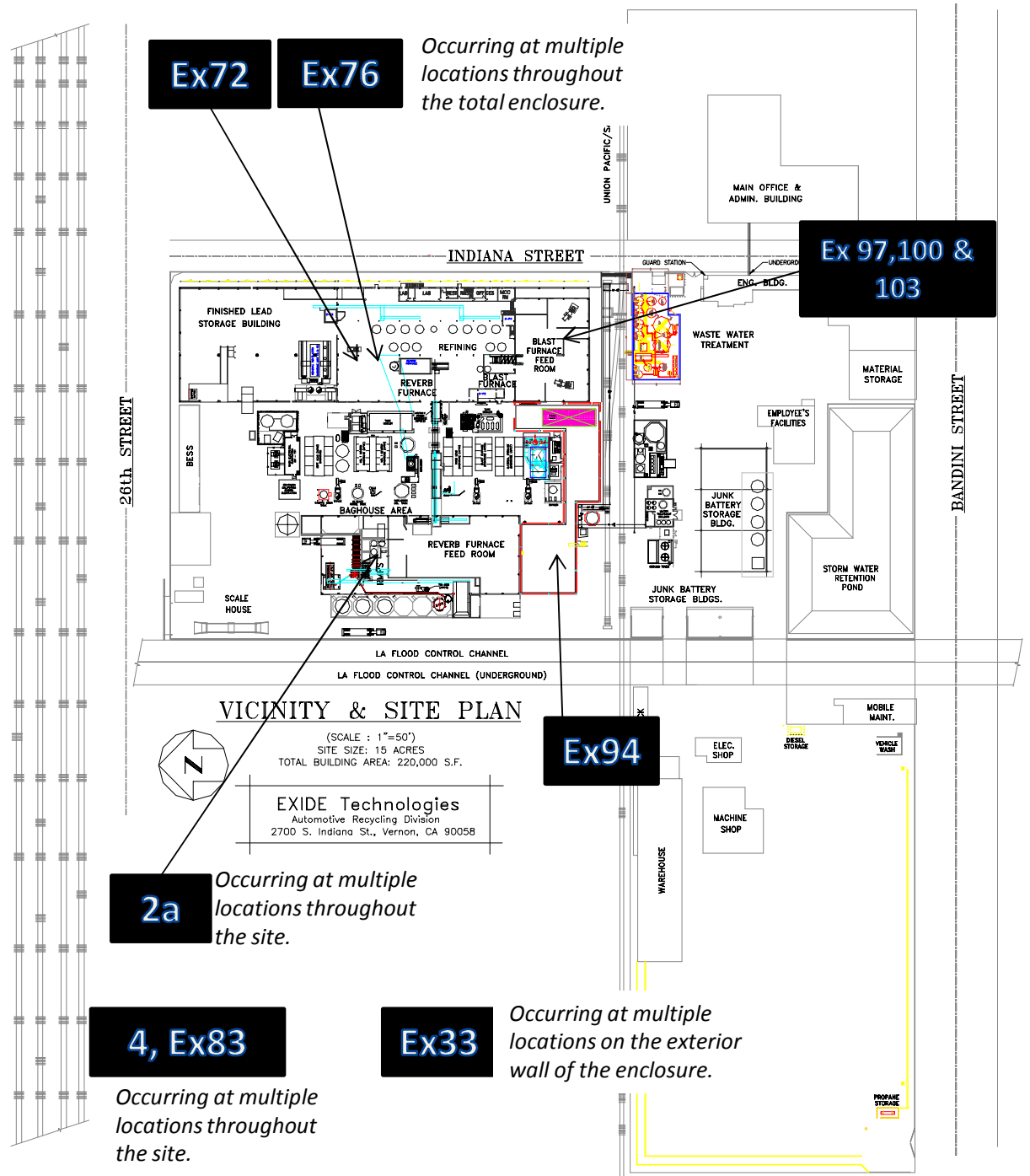
**Ex 97. Removal & Shipment of Blast Feed**

**Ex 100. Removal of Tin/Antimony Dross**

**Ex 103. Removal & Shipment of Drosses & Plates**

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\_073015.pptx



**Monitoring Results / Reports**  
**(Thursday, July 23, 2015)**

<b>ACTIVITY</b>	<b>SERIAL NUMBER</b>	<b>LOCATION</b>
EX103 Removal and Shipment of Dross and Plates	8530151905	Upwind
EX103 Removal and Shipment of Dross and Plates	8530151809	Downwind



Exide Technologies  
2700 Indiana Street  
Vernon, CA 90058

7/23/2015 Work Area EX-103

# Test 032

Instrument		Data Properties	
Model	DustTrak II	Start Date	07/23/2015
Instrument S/N	8530151809	Start Time	10:51:18
		Stop Date	07/23/2015
		Stop Time	13:06:18
		Total Time	0:02:15:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m <sup>3</sup>
1	07/23/2015	11:06:18	0.038
2	07/23/2015	11:21:18	0.039
3	07/23/2015	11:36:18	0.046
4	07/23/2015	11:51:18	0.042
5	07/23/2015	12:06:18	0.039
6	07/23/2015	12:21:18	0.033
7	07/23/2015	12:36:18	0.033
8	07/23/2015	12:51:18	0.033
9	07/23/2015	13:06:18	0.033

# Test 036

Instrument		Data Properties	
Model	DustTrak II	Start Date	07/23/2015
Instrument S/N	8530151905	Start Time	10:54:30
		Stop Date	07/23/2015
		Stop Time	13:09:30
		Total Time	0:02:15:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m <sup>3</sup>
1	07/23/2015	11:09:30	0.045
2	07/23/2015	11:24:30	0.045
3	07/23/2015	11:39:30	0.054
4	07/23/2015	11:54:30	0.045
5	07/23/2015	12:09:30	0.044
6	07/23/2015	12:24:30	0.035
7	07/23/2015	12:39:30	0.037
8	07/23/2015	12:54:30	0.037
9	07/23/2015	13:09:30	0.036

**Monitoring Results / Reports**  
**(Tuesday, July 28, 2015)**

<b>ACTIVITY</b>	<b>SERIAL NUMBER</b>	<b>LOCATION</b>
EX103 Removal and Shipment of Dross and Plates	8530151809	Upwind
EX103 Removal and Shipment of Dross and Plates	8530151905	Downwind



Exide Technologies  
2700 Indiana Street  
Vernon, CA 90058

7/28/2015 Work Area EX-103



# Test 034

Instrument		Data Properties	
Model	DustTrak II	Start Date	07/28/2015
Instrument S/N	8530151809	Start Time	05:36:32
		Stop Date	07/28/2015
		Stop Time	14:36:32
		Total Time	0:09:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m <sup>3</sup>
1	07/28/2015	05:51:32	0.078
2	07/28/2015	06:06:32	0.078
3	07/28/2015	06:21:32	0.080
4	07/28/2015	06:36:32	0.066
5	07/28/2015	06:51:32	0.064
6	07/28/2015	07:06:32	0.068
7	07/28/2015	07:21:32	0.080
8	07/28/2015	07:36:32	0.060
9	07/28/2015	07:51:32	0.058
10	07/28/2015	08:06:32	0.059
11	07/28/2015	08:21:32	0.061
12	07/28/2015	08:36:32	0.067
13	07/28/2015	08:51:32	0.067
14	07/28/2015	09:06:32	0.068
15	07/28/2015	09:21:32	0.065
16	07/28/2015	09:36:32	0.060
17	07/28/2015	09:51:32	0.057
18	07/28/2015	10:06:32	0.057
19	07/28/2015	10:21:32	0.052
20	07/28/2015	10:36:32	0.052
21	07/28/2015	10:51:32	0.051
22	07/28/2015	11:06:32	0.045
23	07/28/2015	11:21:32	0.059
24	07/28/2015	11:36:32	0.044
25	07/28/2015	11:51:32	0.040
26	07/28/2015	12:06:32	0.040
27	07/28/2015	12:21:32	0.037
28	07/28/2015	12:36:32	0.037
29	07/28/2015	12:51:32	0.037
30	07/28/2015	13:06:32	0.036
31	07/28/2015	13:21:32	0.042
32	07/28/2015	13:36:32	0.039
33	07/28/2015	13:51:32	0.037
34	07/28/2015	14:06:32	0.035
35	07/28/2015	14:21:32	0.034
36	07/28/2015	14:36:32	0.033

# Test 037

Instrument		Data Properties	
Model	DustTrak II	Start Date	07/28/2015
Instrument S/N	8530151905	Start Time	05:34:39
		Stop Date	07/28/2015
		Stop Time	14:34:39
		Total Time	0:09:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m <sup>3</sup>
1	07/28/2015	05:49:39	0.056
2	07/28/2015	06:04:39	0.057
3	07/28/2015	06:19:39	0.059
4	07/28/2015	06:34:39	0.050
5	07/28/2015	06:49:39	0.047
6	07/28/2015	07:04:39	0.046
7	07/28/2015	07:19:39	0.064
8	07/28/2015	07:34:39	0.045
9	07/28/2015	07:49:39	0.042
10	07/28/2015	08:04:39	0.043
11	07/28/2015	08:19:39	0.044
12	07/28/2015	08:34:39	0.049
13	07/28/2015	08:49:39	0.049
14	07/28/2015	09:04:39	0.050
15	07/28/2015	09:19:39	0.049
16	07/28/2015	09:34:39	0.043
17	07/28/2015	09:49:39	0.041
18	07/28/2015	10:04:39	0.041
19	07/28/2015	10:19:39	0.037
20	07/28/2015	10:34:39	0.037
21	07/28/2015	10:49:39	0.039
22	07/28/2015	11:04:39	0.034
23	07/28/2015	11:19:39	0.053
24	07/28/2015	11:34:39	0.035
25	07/28/2015	11:49:39	0.031
26	07/28/2015	12:04:39	0.029
27	07/28/2015	12:19:39	0.027
28	07/28/2015	12:34:39	0.027
29	07/28/2015	12:49:39	0.027
30	07/28/2015	13:04:39	0.026
31	07/28/2015	13:19:39	0.031
32	07/28/2015	13:34:39	0.030
33	07/28/2015	13:49:39	0.027
34	07/28/2015	14:04:39	0.026
35	07/28/2015	14:19:39	0.025
36	07/28/2015	14:34:39	0.025