

December 5, 2014

SOUTH COAST AQMD  
CLERK OF THE BOARD  
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

'14 DEC -5 P1:42

**PROJECT: EXIDE TECHNOLOGIES FACILITY ID NO. 124868,  
ORDER OF ABATEMENT CASE NO. 3151-32  
RE: WEEKLY STATUS REPORT # 12 (11/27/14 – 12/3/14)**

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 November 27, 2014 through December 3, 2014. No work was conducted onsite on November 27 and 28, 2014 in observance of the Thanksgiving holiday.

**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) currently under way or completed during this reporting period where mitigation measures were implemented in full compliance with the previously approved mitigation measures under the Mitigation Plan for Construction of Risk Reduction Measures, 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 43	West Yard Sump Piping	None Required
5d	Santa Maria Tank 12	Temporary Enclosure Under Negative Pressure in the Total Enclosure Building
EX 69	Scrap Cutting of Large Metal Pieces	Temporary Enclosure Under Negative Pressure in the Total Enclosure Building
5a	Reverb Furnace Activities	Temporary Enclosure Under Negative Pressure in the Total Enclosure Building
EX 73	Stormwater Repair – 3 Manholes	Temporary Enclosure Under Negative Pressure*
EX 71	Sump 62 Repair	Temporary Enclosure Under Negative Pressure
EX 33	Building Negative Pressure Monitoring Upgrade	Use of self-tapping screws, Pre-Cleaning of area
EX 44	Underground Pipe Project	Temporary Enclosure Under Negative Pressure

\* Dust Trak monitoring performed for this work item.

### Dust Removal

National Response Corporation (NRC) did not complete any dust removal activities onsite during this reporting period. NRC has completed approximately 85% of the dust removal with the Blast Feed Building and the RMPS corridor remaining to be cleaned. NRC was onsite to service the vacuum truck in the finished lead storage building, but no dust removal activities occurred. NRC will return once the re-bricking of the Reverb Furnace is complete, as the work areas overlap.

### West Yard Sump Piping

No work occurred on the West Yard Sump Piping during this reporting period. Exide is awaiting Department of Toxic Substances Control (DTSC) review and comment on proposed piping modification prior to completion of this task. This activity does not require a temporary negative pressure enclosure because no work is being performed that has the potential to generate dust.

### Santa Maria Tank 12

Bear Welding continued work within the temporary enclosure erected inside the Total Enclosure Building on Monday, December 1, 2014, continuing the reconstruction of the Santa Maria Tank #12. Work conducted included installing and welding pieces of the top, sides, and bottom support structure of the Santa Maria Tank #12. Bear Welding's work at the Santa Maria Tank will continue through the next reporting period.

Tetra Tech personnel were onsite to observe work performed by Bear Welding within the Santa Maria Tank #12 temporary enclosure. Verification activities included:

- Verification that the Total Enclosure Building was maintained under negative pressure and vented to operational air pollution control equipment during all activities.
- Confirmation that negative pressure was maintained on the temporary enclosure by checking the gauge.
- Visual inspection of the temporary enclosure prior to the start of each shift to confirm that no visible leaks or tears were present, that the structural integrity of the enclosure was maintained and that it was under negative pressure and vented to a SCAQMD permitted HEPA filtration system throughout the entirety of the project. Any noted areas where seams needed to be re-taped were repaired by Castlerock prior to resuming work within the enclosure. Seams that needed re-taping were identified during the initial inspection by Tetra Tech personnel or when a drop in negative pressure was noted. Any necessary repairs were made immediately.

### Scrap Cutting of Large Metal Pieces

Bear Welding continued work within the temporary enclosure erected inside the Total Enclosure Building on Monday, December 1, 2014, in support of the reconstruction of the Santa Maria Tank. Scrap metal pieces were cut and removed to facilitate the tank reconstruction process. The cutting was conducted inside the temporary enclosure and

removed metal pieces were moved out of the enclosure and placed into a lined closed top roll off bin to await transportation and disposal. The roll off bin was located outside of the RMPS room doorway within the west corridor of the baghouse area.

Tetra Tech personnel were onsite to observe work performed by Bear Welding within the Santa Maria Tank 12 temporary enclosure. Verification activities included:

- Verification that the Total Enclosure Building was maintained under negative pressure and vented to operational air pollution control equipment during all activities.
- Confirmation that negative pressure was maintained on the temporary enclosure by checking the gauge.
- Visual inspection of the temporary enclosure prior to the start of each shift to confirm that no visible leaks or tears were present, that the structural integrity of the enclosure was maintained and that it was under negative pressure and vented to a SCAQMD permitted HEPA filtration system throughout the entirety of the project. Any noted areas where seams needed to be re-taped were repaired by Castlerock prior to resuming work within the enclosure. Seams that needed re-taping were identified during the initial inspection by Tetra Tech personnel or when a drop in negative pressure was noted. Any necessary repairs were made immediately.
- Verification that North RMPS door remained closed to prevent cross draft from North Yard.
- Verification that pieces were cut small enough to fit into the roll-off bin designated for this task.

### Reverb Furnace

Advanced Construction continued cutting and installing the new brick and mortar and refractory material and welding of furnace structural elements for the Reverb Furnace on Monday, December 1, 2014, within the temporary enclosure erected inside the Total Enclosure Building. This work will continue into the next reporting period.

Tetra Tech personnel were onsite to observe installation of the new brick and mortar and welding operations. Verification activities included:

- Verification that the Total Enclosure Building was maintained under negative pressure and vented to operational air pollution control equipment during all activities.
- Confirmation that negative pressure was maintained on the temporary enclosure by checking the gauge.
- Visual inspection of the temporary enclosure prior to the start of each shift to confirm that no visible leaks or tears were present, that the structural integrity of the enclosure was maintained and that the enclosure was under negative pressure and vented to a SCAQMD permitted HEPA filtration system throughout the entirety of the project. Any noted areas where seams needed to be re-taped were repaired by Castlerock prior to resuming work within the enclosures.

Seams that needed re-taping were identified during the initial inspection by Tetra Tech personnel or when a drop in negative pressure was noted. Any necessary repairs were made immediately.

### Stormwater Repair – 3 Manholes

Innovative Construction Solutions (ICS) and their subcontractor Brownco continued work on the storm water manholes on Monday, December 11, 2014, at manhole CL-14. All work was done within a temporary enclosure under negative pressure and vented to an SCAQMD permitted HEPA filtration system. Brownco continued to chip out and remove concrete to expose the pipe joint that required repair. Work was halted on December 2 and 3, 2014 due to rain. The temporary enclosure was cleaned with a HEPA vacuum at the end of the day on December 1, 2014, and all equipment and materials were removed in anticipation of the storm event. Activities were to resume on December 4, 2015. Repair activities at manhole CL-14 will continue into the next reporting period.

Tetra Tech personnel placed Dust Trak monitors upwind and downwind of the temporary enclosure erected over the work areas for manhole CL-14 to monitor for fugitive dust during the repair activities. Tetra Tech personnel also routinely verified that the temporary enclosure maintained negative pressure and was vented to a SCAQMD permitted HEPA filtration system. All Dust Trak monitoring readings upwind and downwind of the work area was generally comparable, indicating that no significant dust emissions were generated from this project

Verification activities included:

- Continuous downwind Dust Trak monitoring on the repair activities performed within the temporary enclosure, to monitor for fugitive dust emissions.
- Confirmation that negative pressure was maintained by checking the gauge on the temporary enclosure.
- Visual inspection of the enclosure prior to the start of each shift to confirm that no visible leaks or tears were present, that the structural integrity of the enclosure was maintained and that the enclosure was under negative pressure and vented to a SCAQMD permitted HEPA filtration system throughout the entirety of the project. Any noted areas where seams needed to be re-taped were repaired by Castlerock prior to resuming work within the enclosure. Seams that needed re-taping were identified during the initial inspection by Tetra Tech personnel or when a drop in negative pressure was noted. Any necessary repairs were made immediately.
- Visual inspection of the completed repair areas to confirm that all liquid and dust had been captured by HEPA vacuum and containerized in sealed 55 gallon drums.
- Visual inspection of drum labels and transfer of the drums to the total enclosure building for proper waste management.

### Sump 62 Repair

Exide completed repairs within the temporary negative pressure enclosure over the Sump 62 area on Wednesday, November 26, 2014, at the waste water treatment plant. Since work was completed, the temporary enclosure was dismantled and removed on Monday, December 1, 2014. Prior to the start of dismantling of the temporary enclosure the area and the enclosure was cleaned using a HEPA vacuum and the enclosure walls were wiped down.

Since work was completed and the enclosure was cleaned prior to dismantling, no dust monitoring was conducted while the dismantling was conducted.

### Building Negative Pressure Monitoring Upgrade

Southwest Industrial Electric was scheduled to start work on this task on Monday, December 1, 2014. However, because of the forecasted rain storms the work was postponed until after the storms subsided. Work was scheduled to begin Thursday, November 4, 2014. Because the task was never started, Tetra tech did no monitoring of the task except for coordination with Exide Project Managers to determine when the task would begin.

### Underground Piping Project

Advanced Construction completed the phase of work for this task inside the temporary enclosure on Wednesday November 26, 2014. Since work was completed, the temporary enclosure was dismantled and removed on Monday, December 1, 2014. Prior to the start of dismantling of the temporary enclosure the area and the enclosure was cleaned using a HEPA vacuum and the enclosure walls were wiped down.

Since work was completed and the enclosure was cleaned prior to dismantling, no dust monitoring was conducted while the dismantling was conducted.

A new smaller enclosure is scheduled to be installed in this area to conduct some welding on the installed truss structure in order to continue with the next phase of this task on Thursday, December 4, 2014

### 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 Construction of Risk Reducing Measures, 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 accordance with the Order for Abatement Case No. 3151-32 Findings and Decision, air monitoring was conducted during enclosure installation/relocation and during all repair work performed within the temporary enclosures at the stormwater manhole repairs. Monitoring results and a site map showing the location of the temporary enclosures are attached. 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 readings upwind and downwind of the noted work areas were generally comparable, indicating that no significant dust emissions were generated through these tasks. Therefore, no additional dust suppression activities were implemented.

Activity Which Resulted in Excessive Dust	Additional Suppression Activity
None	Not Required

**WORKER SAFETY CONCERNS:**

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

- o 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 table below shows the status of these activities

TASK	STATUS
Dust Removal	Ongoing - on hold
West Yard Sump Piping	Ongoing - on hold
Santa Maria Tank 12	Ongoing
Scrap Cutting of Large Metal Pieces	Ongoing
Reverb Furnace Activities	Ongoing
Storm Water Repair – 3 Manholes	Ongoing
Sump 62 Repair	Completed
Feed Room Floor Repair	Completed
Building Negative Pressure Monitoring Upgrade	Ongoing
Underground Pipe Project	Ongoing

**WORK SCHEDULED DURING THE UPCOMING PERIOD:**

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
Dec. 4 - Dec.10	<ul style="list-style-type: none"> <li>• Dust Removal On Hold</li> <li>• West Yard Sump Piping On Hold</li> <li>• Santa Maria Tank #12 Continues</li> <li>• Reverb Furnace Activities Continues</li> <li>• Scrap Cutting Pieces Continues</li> <li>• Underground Piping Project Continues</li> <li>• Storm Water Repair 3 Manholes Continues</li> <li>• Building Negative Pressure Monitoring Upgrade Starts</li> </ul>

Week	Anticipated Activities
Dec 11 - Dec. 17	<ul style="list-style-type: none"> <li>• Dust Removal restarts</li> <li>• West Yard Sump Piping restarts</li> <li>• Santa Maria Tank #12 Continues</li> <li>• Reverb Furnace Activities Continue</li> <li>• Underground Pipe Project Continues</li> <li>• Containerizing Reverb Feed Starts</li> <li>• Scrap Cutting Pieces Continues</li> <li>• Wastewater Treatment Containment Coating Repair Starts</li> <li>• Shipment of Spent Furnace Brick Starts</li> <li>• Building Negative Pressure Monitoring Upgrade Continues</li> <li>• RCRA RFI Soil Sampling Starts</li> </ul>

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

- o Sump 62 Repairs - COMPLETE

POTENTIAL CHANGES AND ACTION ITEMS REQUIRING RESOLUTION:

The following items require resolution:

- o None at this time.

OTHER NOTES/COMMENTS

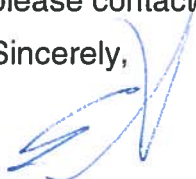
Limited weekend work has resumed.

SUMMARY:

The summary provided herein covers the activities for the period of November 27, 2014 through December 3, 2014. Daily Dust Trak monitoring data are attached. Also attached please find 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 *FS*  
Project Engineer

ATTACHMENTS:

Gant Chart Schedule  
Site Map  
Monitoring Results / Reports



## **Gant Chart Schedule**



## **Site Map**

## Mitigation Project Map Layout

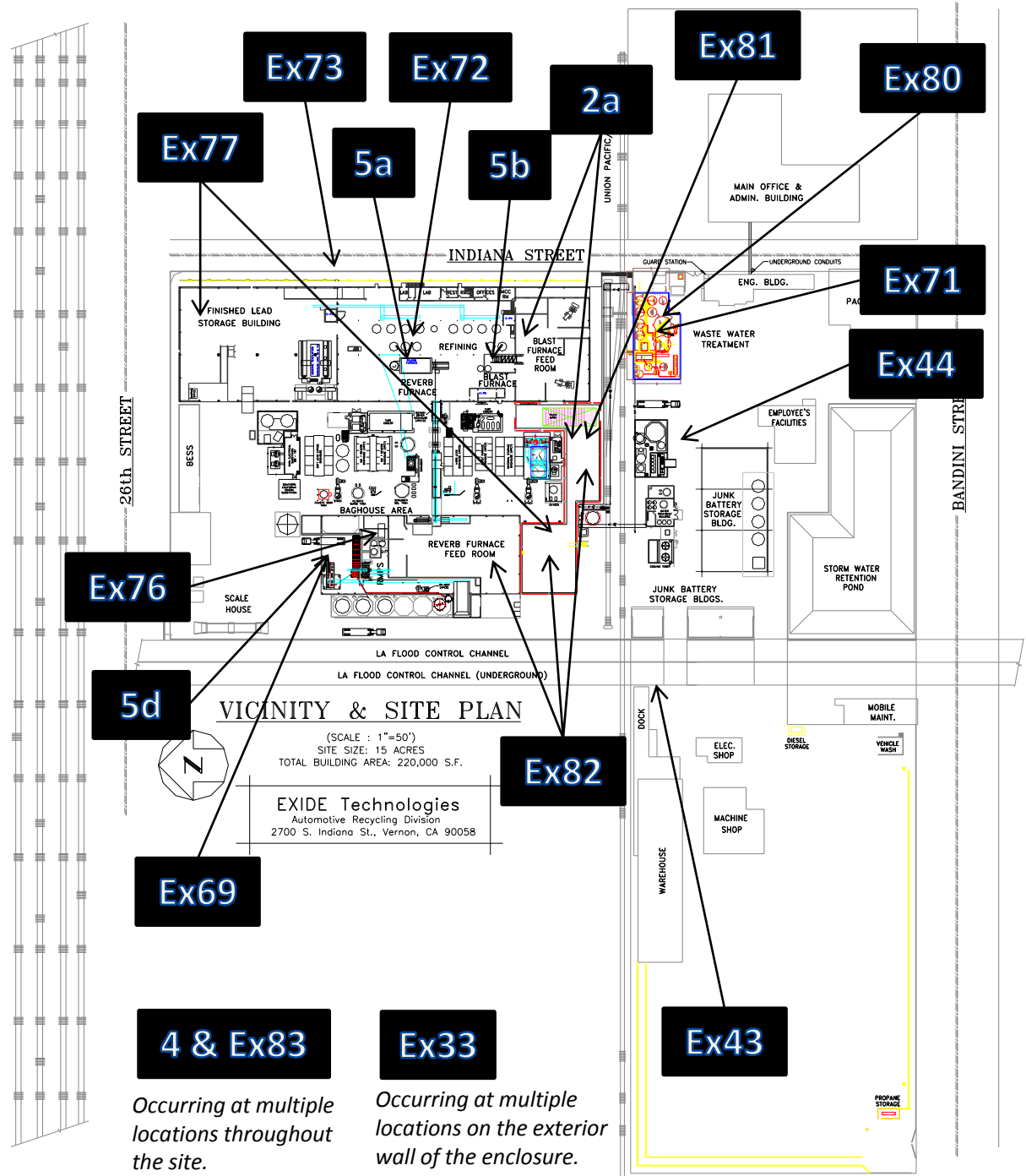
**Week 11/27/14 – 12/17/14**

**Rev: 12/4/2014**

- Ex43. West Yard Sump Piping
- 2a. Dust Removal
- 5d. Rebuild of Santa Maria (Tank 12)
- 5a. Reverb Furnace Activities
- Ex73. Stormwater Repair – 3 Manholes
- Ex71. Sump 62 Repair
- Ex44. Underground Pipe Project
- Ex69. Scrap Cutting Pieces
- Ex77. Containerizing Reverb Feed
- Ex80. WWT Containment Coating Repair
- Ex81. Removal & Shipment of Spent Furnace Brick & Refractory
- Ex33. Building Negative Pressure Monitoring Upgrade
- 4. RCRA RFI Soil Sampling
- Ex83. RFI Soil Sampling Supplemental
- Ex72. Cleaning of Assorted Materials in Total Enclosure
- Ex76. Various Work Methods in Total Enclosure
- 5b. Blast Furnace Activities
- Ex82. Soil Sampling – Reverb Feed Room Enclosure

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\_120414.pptx



**4 & Ex83**  
Occurring at multiple locations throughout the site.

**Ex33**  
Occurring at multiple locations on the exterior wall of the enclosure.

**Monitoring Results / Reports**  
**(December 1, 2014)**



**EXIDE TECHNOLOGIES FACILITY ID NO. 124838  
ORDER FOR ABATEMENT CASE NO. 3151-32  
INSTANTANEOUS DUSTTRAK AIR MONITORING FORM**

Date: 12/1/2014

Work Activity / Location: EX-73 - Storm Water Repair CL14

Cycle Reading No.	Upwind 1		Downwind 1		<del>Downwind 2</del>		<del>Downwind 3</del>	
	Location:	UCL14-1	Location:	DCL14-1	Location:		Location:	
	Serial No.:	8530142303	Serial No.:	8530100906	Serial No.:		Serial No.:	
	Time	Reading (mg/m <sup>3</sup> )	Time	Reading (mg/m <sup>3</sup> )	Time	Reading (mg/m <sup>3</sup> )	Time	Reading (mg/m <sup>3</sup> )
1	6:57	0.039	7:06	0.031				
2	8:09	0.045	8:05	0.024				
3	8:19	0.059	8:18	0.031				
4	9:15	0.074	9:12	0.045				
5	9:30	0.084	9:30	0.042				
6	9:44	0.078	9:45	0.042				
7	9:55	0.075	9:55	0.041				
8	10:06	0.097	10:07	0.048				
9	10:30	0.072	10:30	0.040				
10	11:00	0.071	11:00	0.039				
11	11:30	0.060	11:30	0.042				
12	11:55	0.057	11:55	0.041				
13	12:19	0.051	12:17	0.031				
14	12:30	0.040	12:30	0.030				
15	13:01	0.044	13:00	0.024				
16	13:16	0.042	13:15	0.022				
17	13:40	0.039	13:37	0.040				
18	13:57	0.025	13:53	0.024				
19	14:21	0.038	14:17	0.020				
20	14:44	0.031	14:44	0.026				
21	14:53	0.029	14:54	0.022				
22								
23								
24								
25								
26								
27								
28								
29								
30								
31								
32								

Time	7:05	8:00	9:15	12:25	14:00		
Wind Direction	N	N	N	N	N		
Avg. Wind Speed	1.1	2.5	1.7	1.0	0.2		[mph]
Temperature	63.4	61.9	62.3	71.9	73.7		[°F]

Comments: Work inside the tent began at 6:45am and finished at approximately 15:00pm.  
Tent enclosure negative pressure: -0.037" w.c. at 7:00, -0.029" w.c. at 9:10, -0.030" w.c. at 11:00, -0.026" w.c. at 13:00, -0.021" w.c. at 14:54.

Site Map attached showing location of Dusttrak Monitors, and locations of construction activities.

Recorded By: Henry Jaquez Date: 12/1/2014

Reviewed By: Chris Surdzial Date: 12/1/2014

# Test 042

Instrument		Data Properties	
Model	DustTrak II	Start Date	12/01/2014
Instrument S/N	8530142303	Start Time	06:56:27
		Stop Date	12/01/2014
		Stop Time	14:56:27
		Total Time	0:08:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m <sup>3</sup>
1	12/01/2014	07:11:27	0.050
2	12/01/2014	07:26:27	0.069
3	12/01/2014	07:41:27	0.067
4	12/01/2014	07:56:27	0.049
5	12/01/2014	08:11:27	0.045
6	12/01/2014	08:26:27	0.061
7	12/01/2014	08:41:27	0.086
8	12/01/2014	08:56:27	0.073
9	12/01/2014	09:11:27	0.091
10	12/01/2014	09:26:27	0.095
11	12/01/2014	09:41:27	0.097
12	12/01/2014	09:56:27	0.077
13	12/01/2014	10:11:27	0.079
14	12/01/2014	10:26:27	0.090
15	12/01/2014	10:41:27	0.075
16	12/01/2014	10:56:27	0.066
17	12/01/2014	11:11:27	0.067
18	12/01/2014	11:26:27	0.071
19	12/01/2014	11:41:27	0.059
20	12/01/2014	11:56:27	0.057
21	12/01/2014	12:11:27	0.050
22	12/01/2014	12:26:27	0.048
23	12/01/2014	12:41:27	0.048
24	12/01/2014	12:56:27	0.045
25	12/01/2014	13:11:27	0.048
26	12/01/2014	13:26:27	0.042
27	12/01/2014	13:41:27	0.038
28	12/01/2014	13:56:27	0.036
29	12/01/2014	14:11:27	0.024
30	12/01/2014	14:26:27	0.031
31	12/01/2014	14:41:27	0.034
32	12/01/2014	14:56:27	0.031

# Test 055

Instrument		Data Properties	
Model	DustTrak II	Start Date	12/01/2014
Instrument S/N	8530100906	Start Time	07:05:57
		Stop Date	12/01/2014
		Stop Time	15:05:57
		Total Time	0:08:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m <sup>3</sup>
1	12/01/2014	07:20:57	0.038
2	12/01/2014	07:35:57	0.040
3	12/01/2014	07:50:57	0.028
4	12/01/2014	08:05:57	0.027
5	12/01/2014	08:20:57	0.028
6	12/01/2014	08:35:57	0.052
7	12/01/2014	08:50:57	0.045
8	12/01/2014	09:05:57	0.042
9	12/01/2014	09:20:57	0.066
10	12/01/2014	09:35:57	0.059
11	12/01/2014	09:50:57	0.043
12	12/01/2014	10:05:57	0.047
13	12/01/2014	10:20:57	0.053
14	12/01/2014	10:35:57	0.049
15	12/01/2014	10:50:57	0.038
16	12/01/2014	11:05:57	0.040
17	12/01/2014	11:20:57	0.041
18	12/01/2014	11:35:57	0.039
19	12/01/2014	11:50:57	0.038
20	12/01/2014	12:05:57	0.034
21	12/01/2014	12:20:57	0.029
22	12/01/2014	12:35:57	0.030
23	12/01/2014	12:50:57	0.028
24	12/01/2014	13:05:57	0.032
25	12/01/2014	13:20:57	0.027
26	12/01/2014	13:35:57	0.025
27	12/01/2014	13:50:57	0.024
28	12/01/2014	14:05:57	0.017
29	12/01/2014	14:20:57	0.018
30	12/01/2014	14:35:57	0.021
31	12/01/2014	14:50:57	0.021
32	12/01/2014	15:05:57	0.020





Exide Technologies  
2700 Indiana Street  
Vernon, CA 90058

12/1/2014 Work Area EX-73 - CL14