

SOUTH COAST AOMD CLERK OF THE BOARDS

CN: 15279

September 14, 2016

Ms. Cher Snyder
Assistant Deputy Executive Officer
Office of Engineering and Compliance
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

16 SEP 14 P2 27

PROJECT: EXIDE TECHNOLOGIES FACILITY ID NO. 124838,

ORDER FOR ABATEMENT CASE NO. 3151-32

RE: WEEKLY STATUS REPORT # 104 (9/1/16 – 9/7/16)

Dear Ms. Snyder,

Tetra Tech Inc. is pleased to present the following Weekly Status Report for the above referenced project. This report covers the period of September 1, 2016 through September 7, 2016.

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)
EX83/4	RCRA RFI Soil Sampling	Temporary Enclosure Under Negative Pressure
EX115	Sediment Removal from Equalization Tanks	Maintain Wetted Surfaces
EX 120	Remove Linde LOX Equipment	Pressure wash, Temporary Enclosure Under Negative Pressure*

Dust Trak monitoring performed for this work item.

RCRA RFI Soil Sampling

No work occurred related to the RCRA RFI Soil Sampling. RCRA RFI Soil Sampling activities on the Exide property will continue once a revised scope of work to address changed field conditions is developed and approved by the regulatory agencies.

Sediment Removal from Equalization Tanks

No work occurred related to the sediment removal from the Equalization Tanks. Removal of sediment from Equalization Tank #1 will occur during a future reporting period when it will not impact water treatment activities.

Removal of Linde LOX Equipment

Exide and its subcontractor, Castlerock resumed construction of the temporary enclosure around the base of the liquid oxygen (LOX) equipment on Tuesday, September 6, 2016, and once it was complete Linde began detaching the equipment. On Wednesday, September 7, 2016, Linde mobilized two cranes to the site to remove the LOX equipment. Linde loaded the LOX equipment onto flatbed trucks where it was wrapped in plastic prior to departure. The activities were completed in accordance with the approved mitigation plan with one exception. One of the cranes mobilized to the site was too big to fit through Exide's wheel wash. The approved mitigation plan called for all equipment associated with the removal of the LOX equipment to go through the wheel wash prior to leaving the facility. Exide personnel manually washed each wheel of the crane in the west yard parking lot adjacent to the wheel wash prior to it leaving the site.

Castlerock will complete removal of the temporary enclosure during the next reporting period. Tetra Tech personnel were onsite to monitor work related to the removal of the Linde LOX equipment including upwind and downwind Dust Trak monitoring.

Verification activities included:

- Visual observation of the removal activities to verify compliance with the SCAQMD approved mitigation plan.
- Visual observation of the LOX equipment and support vehicles passing through the wheel wash prior to leaving the facility.
- Visual observation of the manual washing of the wheels of the crane that was too big to fit through Exide's wheel wash.
- Upwind and Downwind Dust Trak monitoring of the areas when activities were conducted, to monitor for fugitive dust emissions. Review of Dust Trak data did not indicate that work associated with removal of the Linde LOX Equipment was generating fugitive dust emissions.

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	
EX 120	Remove Linde	Crane too large for	Manually Wash	
	LOX Equipment	Exide's Wheel Wash	Tires	

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
None	None

WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
Sept. 8 – Sept. 14	Remove Linde LOX Equipment

Week	Anticipated Activities
Sept. 15 - Sept. 21	None at this time

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 1, 2016 through September 7, 2016. Tetra Tech personnel were onsite to attend routine weekly meetings on Thursday, September 2, 2016, and on Tuesday, September 6, 2016 and Wednesday, September 7, 2016 to observe activities associated with the removal of the Linde LOX equipment. No work occurred on Monday, September 6, 2016 in observance of the Labor Day holiday. 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 Data Sheets

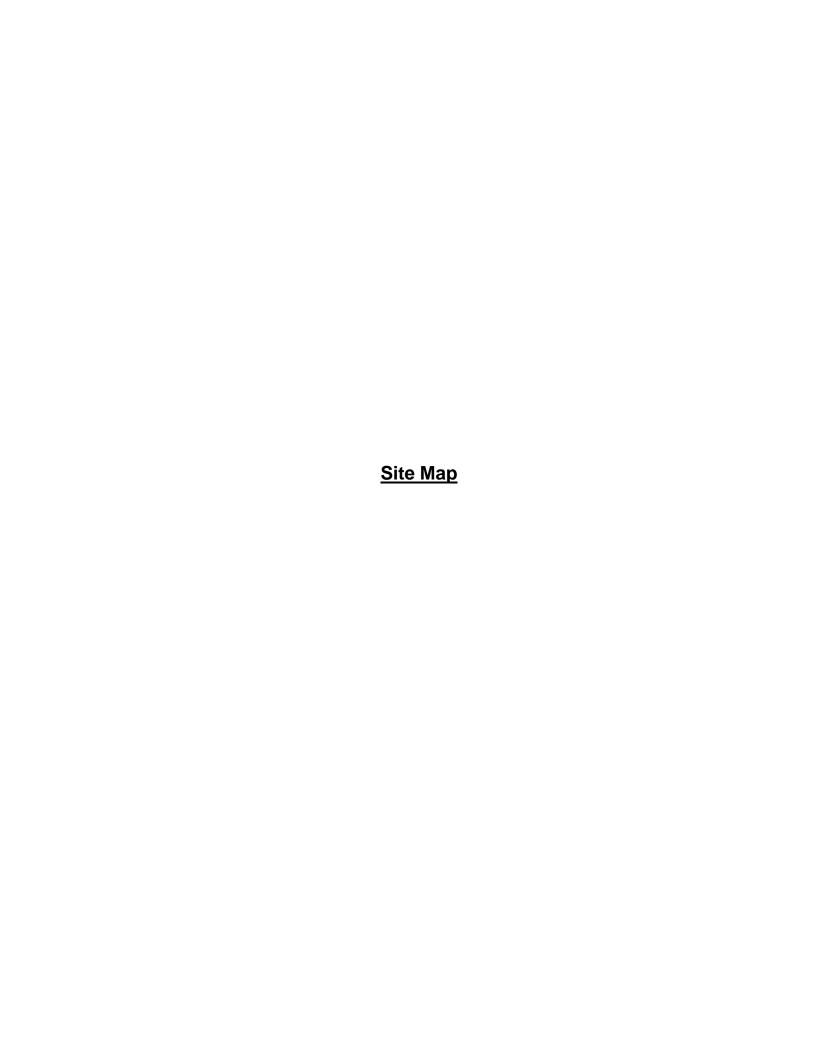


Project Schedule Week of 08/31/16 – 09/22/16

Rev: 09/08/2016

TECHNOLOGIES Recycling Division, Vernon, CA							09/03/16		09/10/16	09/17/16	09/24/
Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	31 01 02 0	03 04	05 06 07 08 09 10	11 12 13 14 15 16 17	18 19 20 21 22
Ex 72 Cleaning of Ass	orted Materials in Total Enclosure	Total Enclosure	772 days	11/20/14	12/31/16	80%					
Ex 76 Various Work M	fethods in Total Enclosure	Total Enclosure	771 days	11/21/14	12/31/16	80%					
4 RCRA RFI Soil	Sampling	General	682 days	2/18/15	12/31/16	97%					
Ex 83 RFI Soil Sampli	ng Supplemental	General	682 days	02/18/15	12/31/16	97%					
Ex 115 Sediment Remo	val from EQ Tanks	WWTP	5 days	3/7/16	12/31/16	50%					
Ex 120 Remove Linde L	OX Equip	South of Total Enclosure	5 days	8/29/16	09/08/16	90%					

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





Mitigation Project Map Layout

Week 08/31/16 - 09/22/16 Rev: 09/08/2016

4. RCRA RFI Soil Sampling

Ex 83. RFI Soil Sampling Supplemental

Ex 72. Cleaning of Assorted Materials in Total Encl.

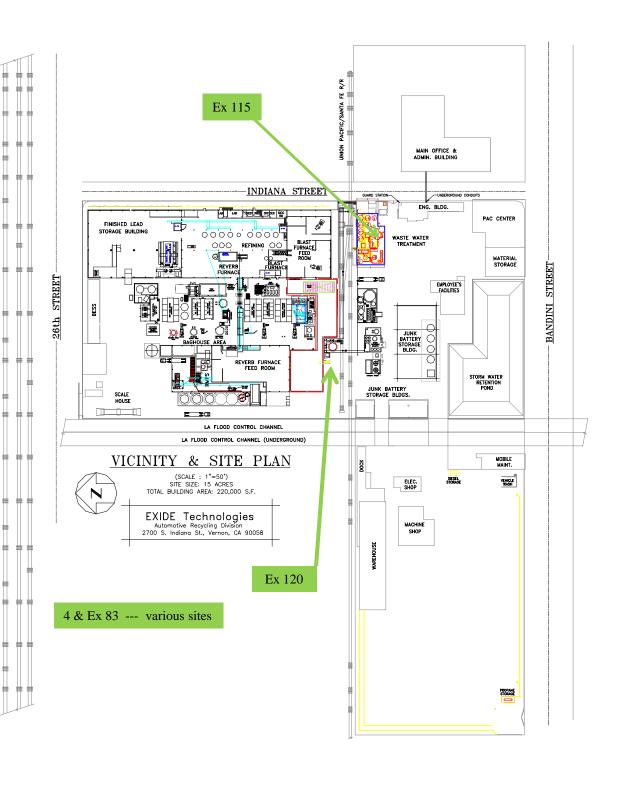
Ex 76. Various Work Methods in Total Enclosure

Ex 115. Sediment Removal from EQ Tanks

Ex 120 Remove Linde LOX Equip

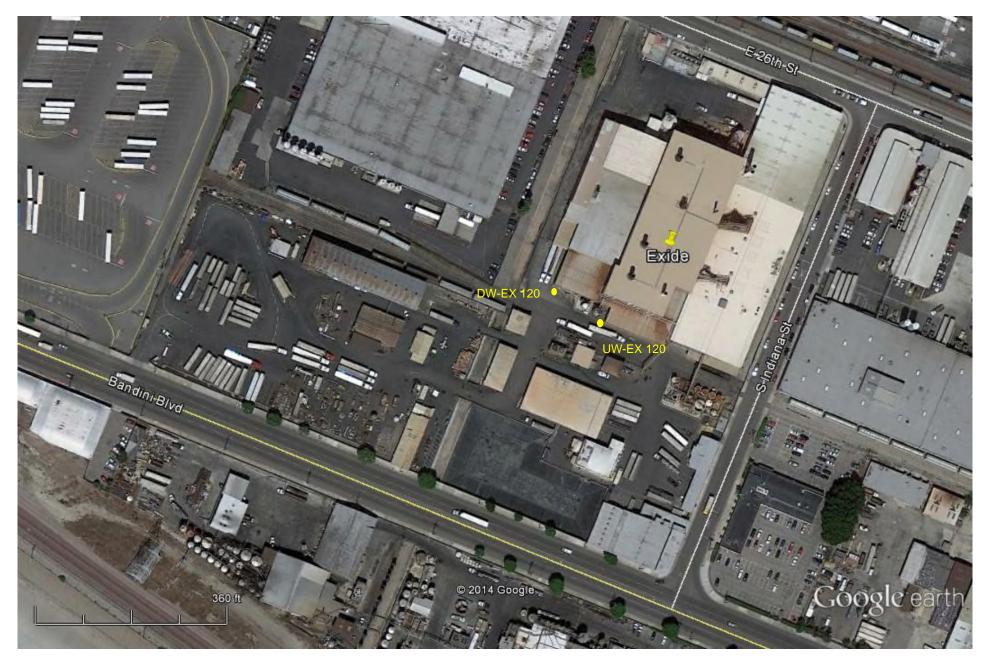
Numbering system correlates with Mitigation plan document. Ex refers to additional work part of Sec. 6b in the Mitigation plan document.

Mitigation Schedule and Map_09/08/2016.pptx



Monitoring Results / Reports (Tuesday, September 6, 2016)

ACTIVITY	SERIAL NUMBER	LOCATION
EX 120 – Remove Linde LOX Equipment	8533113401	Upwind
EX 120 – Remove Linde LOX Equipment	8533151002	Downwind



Exide Technologies 2700 Indiana Street Vernon, CA 90058

9/6/2016 EX 120

Test 003

Inst	rument	Data Properties		
Model	DustTrak DRX	Start Date	09/06/2016	
Instrument S/N	8533113401	Start Time	08:13:27	
		Stop Date	09/06/2016	
		Stop Time	15:28:27	
			0:07:10:00	
		Logging Interval	900 seconds	

				Test Data			
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3
1	09/06/2016	08:28:27	0.036	0.036	0.037	0.037	0.037
2	09/06/2016	08:43:27	0.039	0.039	0.040	0.041	0.041
3	09/06/2016	08:58:27	0.039	0.039	0.040	0.040	0.040
4	09/06/2016	09:13:27	0.038	0.038	0.039	0.040	0.040
5	09/06/2016	09:28:27	0.039	0.040	0.040	0.041	0.042
6	09/06/2016	09:43:27	0.042	0.043	0.043	0.045	0.045
7	09/06/2016	09:58:27	0.043	0.044	0.044	0.045	0.046
8	09/06/2016	10:13:27	0.044	0.044	0.045	0.046	0.046
9	09/06/2016	10:28:27	0.046	0.047	0.047	0.048	0.048
10	09/06/2016	10:43:27	0.047	0.047	0.048	0.048	0.048
11	09/06/2016	10:58:27	0.047	0.048	0.048	0.049	0.049
12	09/06/2016	11:13:27	0.048	0.049	0.049	0.050	0.050
13	09/06/2016	11:28:27	0.047	0.047	0.048	0.049	0.049
14	09/06/2016	11:43:27	0.051	0.052	0.053	0.054	0.054
15	09/06/2016	11:58:27	0.046	0.047	0.047	0.048	0.049
16	09/06/2016	12:13:27	0.042	0.043	0.043	0.044	0.044
17	09/06/2016	12:28:27	0.040	0.040	0.041	0.042	0.042
18	09/06/2016	12:43:27	0.038	0.038	0.039	0.040	0.040
19	09/06/2016	12:58:27	0.036	0.036	0.037	0.038	0.038
20	09/06/2016	13:13:27	0.033	0.033	0.034	0.035	0.035
21	09/06/2016	13:28:27	0.031	0.031	0.032	0.033	0.034
22	09/06/2016	13:43:27	0.029	0.030	0.030	0.031	0.031
23	09/06/2016	13:58:27	0.028	0.029	0.029	0.030	0.031
24	09/06/2016	14:13:27	0.028	0.028	0.028	0.029	0.029
25	09/06/2016	14:28:27	0.028	0.028	0.028	0.029	0.029
26	09/06/2016	14:43:27	0.027	0.027	0.028	0.029	0.029
27	09/06/2016	14:58:27	0.026	0.026	0.027	0.028	0.028
28	09/06/2016	15:13:27	0.026	0.027	0.027	0.028	0.028
29	09/06/2016	15:24:21	0.000	0.000	0.000	0.000	0.000

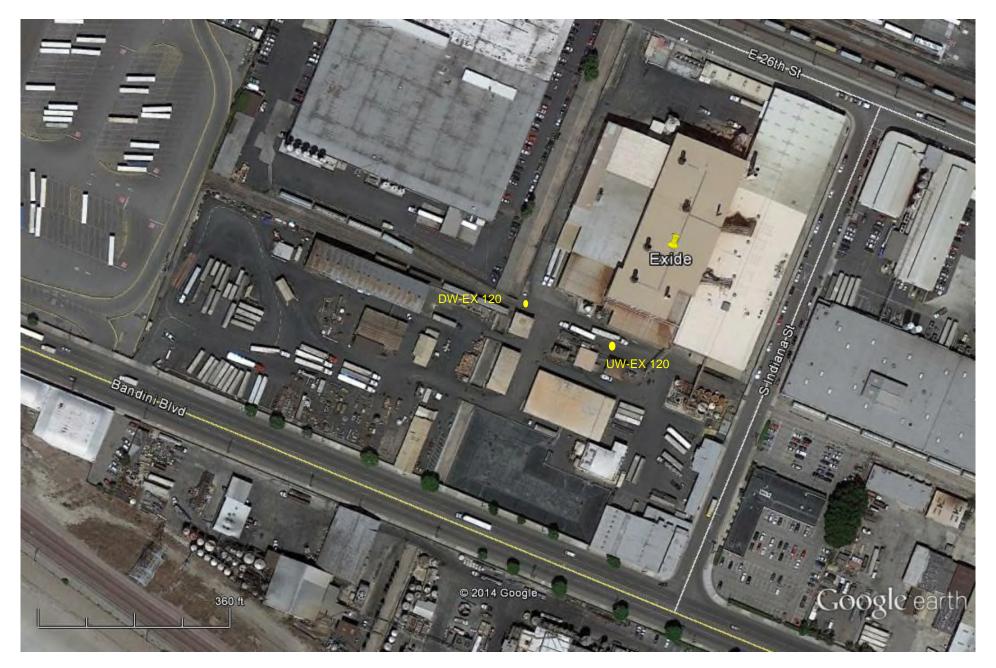
Test 003

Inst	rument	Data Properties		
Model	DustTrak DRX	Start Date	09/06/2016	
Instrument S/N	8533151002	Start Time	08:17:23	
		Stop Date	09/06/2016	
		Stop Time	15:02:23	
			0:06:45:00	
			900 seconds	

	Test Data							
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3	
1	09/06/2016	08:32:23	0.025	0.027	0.028	0.031	0.032	
2	09/06/2016	08:47:23	0.028	0.030	0.030	0.031	0.031	
3	09/06/2016	09:02:23	0.028	0.030	0.030	0.031	0.031	
4	09/06/2016	09:17:23	0.028	0.030	0.030	0.031	0.032	
5	09/06/2016	09:32:23	0.032	0.034	0.035	0.036	0.036	
6	09/06/2016	09:47:23	0.035	0.036	0.037	0.038	0.038	
7	09/06/2016	10:02:23	0.037	0.039	0.039	0.041	0.041	
8	09/06/2016	10:17:23	0.038	0.039	0.040	0.041	0.041	
9	09/06/2016	10:32:23	0.038	0.040	0.040	0.041	0.041	
10	09/06/2016	10:47:23	0.036	0.038	0.038	0.039	0.039	
11	09/06/2016	11:02:23	0.036	0.037	0.038	0.039	0.039	
12	09/06/2016	11:17:23	0.035	0.036	0.037	0.038	0.038	
13	09/06/2016	11:32:23	0.035	0.037	0.037	0.038	0.038	
14	09/06/2016	11:47:23	0.034	0.036	0.037	0.039	0.039	
15	09/06/2016	12:02:23	0.030	0.031	0.031	0.033	0.033	
16	09/06/2016	12:17:23	0.026	0.028	0.028	0.029	0.029	
17	09/06/2016	12:32:23	0.023	0.024	0.025	0.026	0.026	
18	09/06/2016	12:47:23	0.022	0.023	0.023	0.025	0.025	
19	09/06/2016	13:02:23	0.019	0.020	0.021	0.022	0.022	
20	09/06/2016	13:17:23	0.016	0.017	0.018	0.019	0.019	
21	09/06/2016	13:32:23	0.015	0.016	0.016	0.017	0.017	
22	09/06/2016	13:47:23	0.014	0.015	0.015	0.017	0.017	
23	09/06/2016	14:02:23	0.013	0.014	0.014	0.015	0.016	
24	09/06/2016	14:17:23	0.012	0.013	0.014	0.015	0.015	
25	09/06/2016	14:32:23	0.011	0.012	0.012	0.013	0.014	
26	09/06/2016	14:47:23	0.012	0.013	0.013	0.014	0.014	
27	09/06/2016	15:02:23	0.011	0.012	0.013	0.014	0.014	

Monitoring Results / Reports (Wednesday, September 7, 2016)

ACTIVITY	SERIAL NUMBER	LOCATION
EX 120 – Remove Linde LOX Equipment	8533113401	Upwind
EX 120 – Remove Linde LOX Equipment	8533151002	Downwind



Exide Technologies 2700 Indiana Street Vernon, CA 90058

9/7/2016 EX 120

Test 004

ERROR: MAX PM1, MAX PM2.5, MAX RESP, MAX PM10, MAX TOTAL

Instr	ument	Data Properties		
Model DustTrak DRX		Start Date	09/07/2016	
Instrument S/N	8533113401	Start Time	06:26:00	
			09/07/2016	
		Stop Time	16:11:00	
			0:09:39:00	
		Logging Interval	900 seconds	

	Test Data							
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3	
1	09/07/2016	06:41:00	0.042	0.042	0.043	0.043	0.043	
2	09/07/2016	06:56:00	0.044	0.045	0.045	0.046	0.046	
3	09/07/2016	07:11:00	0.042	0.043	0.043	0.044	0.044	
4	09/07/2016	07:26:00	0.044	0.044	0.045	0.045	0.046	
5	09/07/2016	07:41:00	0.046	0.047	0.047	0.048	0.048	
6	09/07/2016	07:56:00	0.048	0.049	0.049	0.050	0.050	
7	09/07/2016	08:11:00	0.051	0.052	0.052	0.053	0.053	
8	09/07/2016	08:26:00	0.056	0.057	0.057	0.058	0.058	
9	09/07/2016	08:41:00	0.058	0.058	0.059	0.060	0.060	
10	09/07/2016	08:56:00	0.061	0.061	0.062	0.063	0.063	
11	09/07/2016	09:11:00	0.062	0.063	0.064	0.064	0.064	
12	09/07/2016	09:26:00	0.057	0.058	0.058	0.059	0.059	
13	09/07/2016	09:41:00	0.057	0.057	0.058	0.059	0.059	
14	09/07/2016	09:56:00	0.056	0.056	0.057	0.058	0.058	
15	09/07/2016	10:11:00	0.052	0.053	0.053	0.054	0.054	
16	09/07/2016	10:26:00	0.050	0.050	0.051	0.052	0.052	
17	09/07/2016	10:41:00	0.049	0.050	0.050	0.051	0.051	
18	09/07/2016	10:56:00	0.048	0.048	0.048	0.049	0.049	
19	09/07/2016	11:11:00	0.045	0.045	0.046	0.046	0.047	
20	09/07/2016	11:26:00	0.044	0.044	0.045	0.046	0.046	
21	09/07/2016	11:41:00	0.047	0.048	0.048	0.049	0.049	
22	09/07/2016	11:56:00	0.049	0.049	0.050	0.051	0.051	
23	09/07/2016	12:11:00	0.043	0.044	0.044	0.045	0.045	
24	09/07/2016	12:26:00	0.049	0.049	0.050	0.051	0.051	
25	09/07/2016	12:41:00	0.054	0.054	0.055	0.056	0.056	
26	09/07/2016	12:56:00	0.050	0.051	0.051	0.052	0.052	
27	09/07/2016	13:11:00	0.050	0.051	0.052	0.052	0.053	
28	09/07/2016	13:26:00	0.047	0.048	0.049	0.050	0.050	
29	09/07/2016	13:41:00	0.048	0.048	0.049	0.050	0.050	
30	09/07/2016	13:56:00	0.047	0.047	0.048	0.049	0.049	
31	09/07/2016	14:11:00	0.048	0.048	0.049	0.050	0.050	
32	09/07/2016	14:26:00	0.046	0.046	0.047	0.048	0.048	
33	09/07/2016	14:41:00	0.045	0.046	0.046	0.047	0.047	
34	09/07/2016	14:56:00	0.044	0.045	0.045	0.046	0.047	

Test Data							
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3
35	09/07/2016	15:11:00	0.043	0.044	0.044	0.046	0.046
36	09/07/2016	15:26:00	0.041	0.041	0.042	0.043	0.043
37	09/07/2016	15:41:00	0.041	0.041	0.042	0.043	0.043
38	09/07/2016	15:56:00	0.042	0.042	0.042	0.043	0.044
39	09/07/2016	16:05:46	0.000	0.000	0.000	0.000	0.000

Test 004

Insti	rument	Data Properties		
Model	Model DustTrak DRX		09/07/2016	
Instrument S/N	8533151002	Start Time	06:27:03	
		Stop Date	09/07/2016	
		Stop Time	15:42:03	
		Total Time	0:09:15:00	
		Logging Interval	900 seconds	

	Test Data							
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3	
1	09/07/2016	06:42:03	0.033	0.035	0.036	0.037	0.038	
2	09/07/2016	06:57:03	0.035	0.037	0.038	0.039	0.039	
3	09/07/2016	07:12:03	0.034	0.036	0.036	0.037	0.037	
4	09/07/2016	07:27:03	0.035	0.037	0.038	0.038	0.039	
5	09/07/2016	07:42:03	0.038	0.040	0.041	0.042	0.042	
6	09/07/2016	07:57:03	0.040	0.043	0.043	0.044	0.044	
7	09/07/2016	08:12:03	0.043	0.046	0.046	0.047	0.047	
8	09/07/2016	08:27:03	0.048	0.050	0.051	0.051	0.051	
9	09/07/2016	08:42:03	0.050	0.053	0.054	0.054	0.054	
10	09/07/2016	08:57:03	0.053	0.056	0.056	0.057	0.057	
11	09/07/2016	09:12:03	0.055	0.057	0.058	0.059	0.059	
12	09/07/2016	09:27:03	0.053	0.056	0.057	0.057	0.058	
13	09/07/2016	09:42:03	0.054	0.057	0.058	0.059	0.059	
14	09/07/2016	09:57:03	0.051	0.054	0.054	0.055	0.055	
15	09/07/2016	10:12:03	0.046	0.048	0.049	0.050	0.050	
16	09/07/2016	10:27:03	0.041	0.043	0.044	0.045	0.045	
17	09/07/2016	10:42:03	0.040	0.042	0.043	0.044	0.044	
18	09/07/2016	10:57:03	0.035	0.037	0.038	0.039	0.039	
19	09/07/2016	11:12:03	0.034	0.035	0.036	0.037	0.037	
20	09/07/2016	11:27:03	0.034	0.036	0.037	0.039	0.039	
21	09/07/2016	11:42:03	0.031	0.033	0.033	0.035	0.035	
22	09/07/2016	11:57:03	0.030	0.032	0.032	0.034	0.034	
23	09/07/2016	12:12:03	0.032	0.033	0.034	0.035	0.035	
24	09/07/2016	12:27:03	0.032	0.034	0.035	0.036	0.036	
25	09/07/2016	12:42:03	0.035	0.036	0.037	0.039	0.039	
26	09/07/2016	12:57:03	0.033	0.035	0.035	0.037	0.038	
27	09/07/2016	13:12:03	0.032	0.034	0.035	0.036	0.036	
28	09/07/2016	13:27:03	0.030	0.032	0.033	0.035	0.035	
29	09/07/2016	13:42:03	0.026	0.027	0.028	0.029	0.030	
30	09/07/2016	13:57:03	0.029	0.031	0.031	0.033	0.033	
31	09/07/2016	14:12:03	0.028	0.030	0.031	0.032	0.032	
32	09/07/2016	14:27:03	0.029	0.030	0.031	0.033	0.033	
33	09/07/2016	14:42:03	0.030	0.032	0.032	0.034	0.034	
34	09/07/2016	14:57:03	0.028	0.029	0.030	0.031	0.031	
35	09/07/2016	15:12:03	0.028	0.029	0.030	0.031	0.032	

Test Data							
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3
36	09/07/2016	15:27:03	0.027	0.029	0.029	0.031	0.031
37	09/07/2016	15:42:03	0.029	0.030	0.031	0.032	0.032