



SOUTH COAST AQMD
CLERK OF THE BOARDS

July 10, 2015

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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

**PROJECT: EXIDE TECHNOLOGIES FACILITY ID NO. 124868,
ORDER OF ABATEMENT CASE NO. 3151-32**
RE: WEEKLY STATUS REPORT # 43 (7/2/15 – 7/8/15)

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 2, 2015 through July 8, 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 73	Stormwater Repair – 3 Manholes	Temporary Enclosure 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 nd 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 101	Removal Loose Lead in Kettles	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.

Stormwater Repair – 3 Manholes

Innovative Construction Solutions (ICS) resumed activities on Monday, July 6, 2015 at Manhole CL-14. Repair activities during this reporting period included additional removal of soil from around the storm drain pipe. Soil cuttings were placed into 55-gallon drums within a temporary enclosure. Once sufficient soil was removed from around the storm drain pipe, ICS completed the necessary repairs. Testing and backfill activities will continue into the next reporting period.

Verification activities included:

- Upwind and Downwind Dust Trak monitoring on the temporary enclosure when activities were conducted within the enclosure, to monitor for fugitive dust emissions. Review of Dust Trak data did not indicate that work associated with the stormwater repair was generating fugitive dust emissions.
- Confirmation that negative pressure was maintained by checking the gauge on the temporary enclosure.
- Periodic visual inspection of the temporary enclosures to confirm that no visible leaks or tears were present, that the structural integrity of the enclosures were maintained and that they were under negative pressure and vented to a SCAQMD permitted HEPA filtration system. Any noted areas where seams needed to be re-taped were repaired by Castle rock prior to resuming work within the enclosures. Any observed conditions requiring repair were addressed immediately.

Building Negative Pressure Monitoring Upgrade

Exide continued installation activities on July 2, 2015. The negative pressure monitoring upgrades installation activities are complete and debugging of software will continue into the next reporting period.

RCRA RFI Soil Sampling

Advanced Geoscience and their subcontractors Cascade Drilling, and Avocet did not complete any of the RCRA RFI Soil Sampling on site during this reporting period. RCRA RFI Soil Sampling is scheduled to resume on Monday, July 13, 2015.

Soil Sampling – 2nd 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 continue into the next reporting period.

Removal and Shipping of Blast Feed

Removal and shipment of feed resumed on Tuesday, July 7, 2015. Exide inspected the “end dump” trailer when it arrived at the site to verify that it was in good working condition and met Exide’s Pre-Loading Checklist requirements. The trailer passed inspection and was lined with a 6-mil polypropylene liner, ensuring that the liner was dimensioned adequately (length and width) to fashion a “burrito” type wrapping of the material after loading. Once lined, the 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 1 “end dump” trailer passed inspection, was loaded with blast feed, and shipped to Exide’s Munsee, Indiana facility during this reporting period. Removal and shipment of feed will continue into the next reporting period.

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 Blast Feed 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 blast feed 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 7, 2015.

Removal and Shipment of Tin and Antimony Dross

Advanced Construction personnel continued the removal and shipment of Tin Dross on Thursday, July 2, 2015. Advanced personnel loaded the Tin Dross material into brand new purchased 30-gallon DOT approved drums. The drums were inspected by Exide and Advanced prior to being lined and covered with plastic. The material was slowly lowered into the drum with the shovel and not dumped from the top of the drum to minimize the amount of fugitive dust generated. A manually controlled misting sprayer was used to keep the material moist to further minimize fugitive dust during loading of this material into the drums. The loaded drums were moved from the Blast Feed Room to the Refining room where the plastic was removed from the outside of the drums, the drums were securely capped, and then vacuumed using a permitted HEPA vacuum. After the drums were sealed and decontaminated, they were moved to the Finished Goods Shipping area where they were palletized, labeled, and prepared for shipment.

After the drums were secured on the pallet and ready for shipping they were transported out of the total enclosure building to the outside Container Storage Area Units 1, 2 and 3 in the South Yard of the plant until shipped offsite. A total of

approximately 280 drums of tin dross were inspected, loaded, decontaminated and palletized for shipment during this reporting period.

On Monday, July 6, 2015 Exide began shipping Tin Dross to a recycling facility in Texas. A total of 27 pallets, 108 drums, of tin dross were loaded onto a truck and shipped offsite for recycling.

Verification activities included:

- 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 Tin Dross including: the pre-loading inspection of the drums, installation of plastic lining and covering, loading of Tin Dross, application of water mist to reduce fugitive dust generated during the loading process, sealing and decontamination of the drums, placement of the drums on the pallet, and movement of the pallets to Container Storage Area Units 1, 2 and 3.
- Visual observation witnessed 80 drums on July 2, 2015, 100 drums on July 6, 2015, and 100 drums on July 7, 2015.

Removal of Loose Lead from Kettles

Exide personnel stopped the removal of loose lead from the kettles indicating that DTSC had requested that this activity be included in the site Closure Plan currently being prepared.

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
Storm Water Repair – 3 Manholes	Ongoing
Building Negative Pressure Monitoring Upgrade	Ongoing
RCRA RFI Soil Sampling	Ongoing – on hold
2 nd Round Feed Room Soil Sampling	Ongoing – on hold
Removal and Shipment of Blast Feed	Ongoing
Removal of Loose Lead from Kettles	On hold
Removal and Shipment of Tin and Antimony Dross	Ongoing

WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
July 9 – July 15	<ul style="list-style-type: none"> • Dust Removal On Hold • Storm Water Repair 3 Manholes Completes • Building Negative Pressure Upgrade Continues • RCRA RFI Soil Sampling Continues • 2nd Round of Feed Room Floor Sampling On Hold • Removal and Shipment of Blast Feed Continues • Removal of Loose Lead in Kettles On Hold • Removal and Shipment of Blast Feed - Tin and Antimony Dross Continues

Week	Anticipated Activities
July 16 - July 22	<ul style="list-style-type: none">• Dust Removal On Hold• Building Negative Pressure Upgrade Continues• RCRA RFI Soil Sampling Continues• 2nd Round of Feed Room Floor Sampling Continues• Removal and Shipment of Blast Feed Completes• Removal and Shipment of Blast Feed - Tin and Antimony Dross 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 July 2, 2015 through July 8, 2015. Please note that no work was completed on July 3, 2015, in observation of Independence 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,



Nick Somogyi
Project Engineer

ATTACHMENTS:

Gant Chart Schedule
Site Map
Field Monitoring Data

Gant Chart Schedule

Site Map

EXIDE[®]

TECHNOLOGIES

Mitigation Project Map Layout

Week 7/02/15 – 7/22/15

Rev: 7/09/15

2a. Dust Removal

Ex 73. Storm water Repair – 3 Manholes

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. 2nd Round Feed Room Soil Sampling

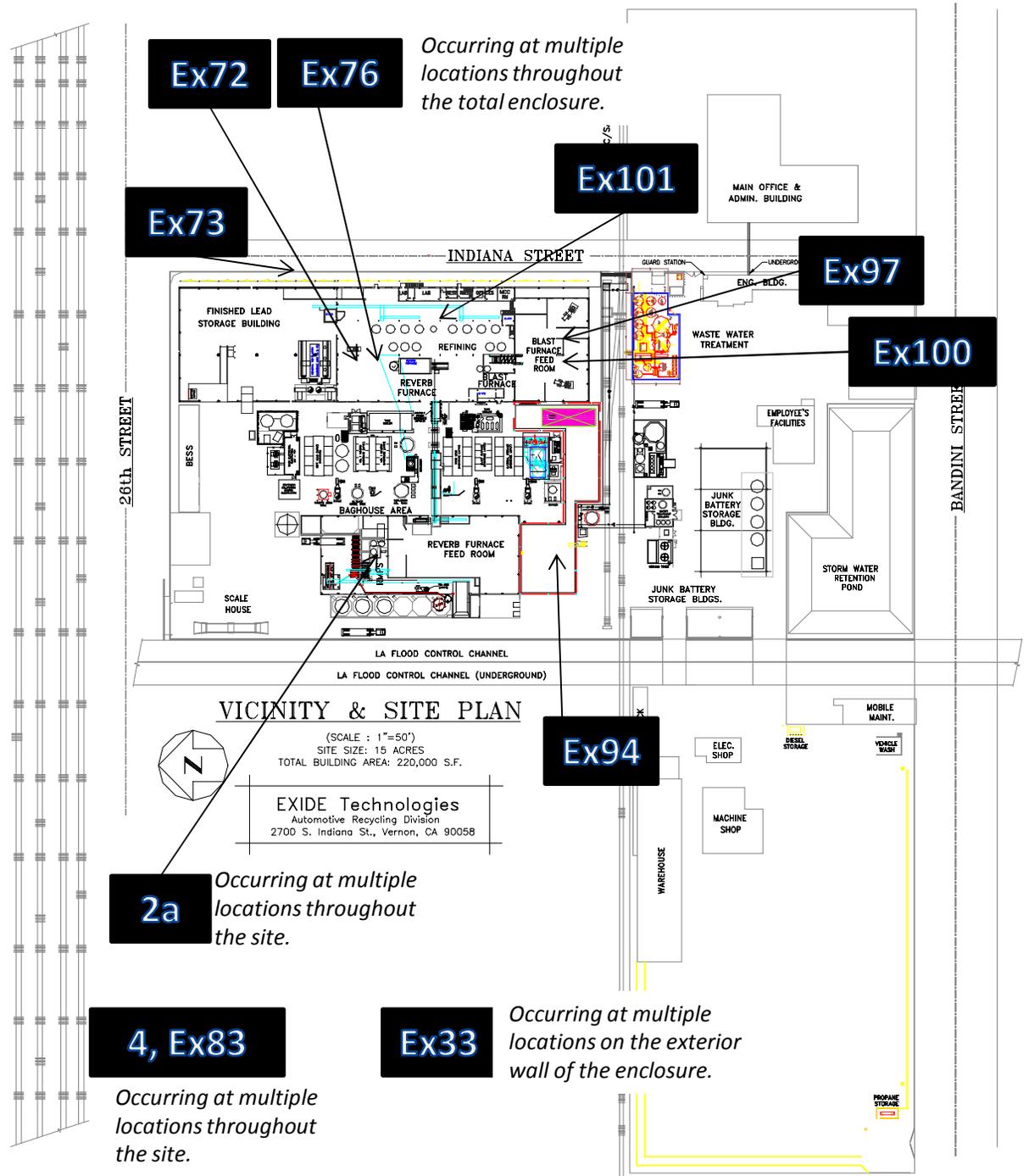
Ex 97. Removal & Shipment of Blast Feed

Ex 100. Removal of Tin/Antimony Dross

Ex 101. Removal of Loose Lead from Kettles

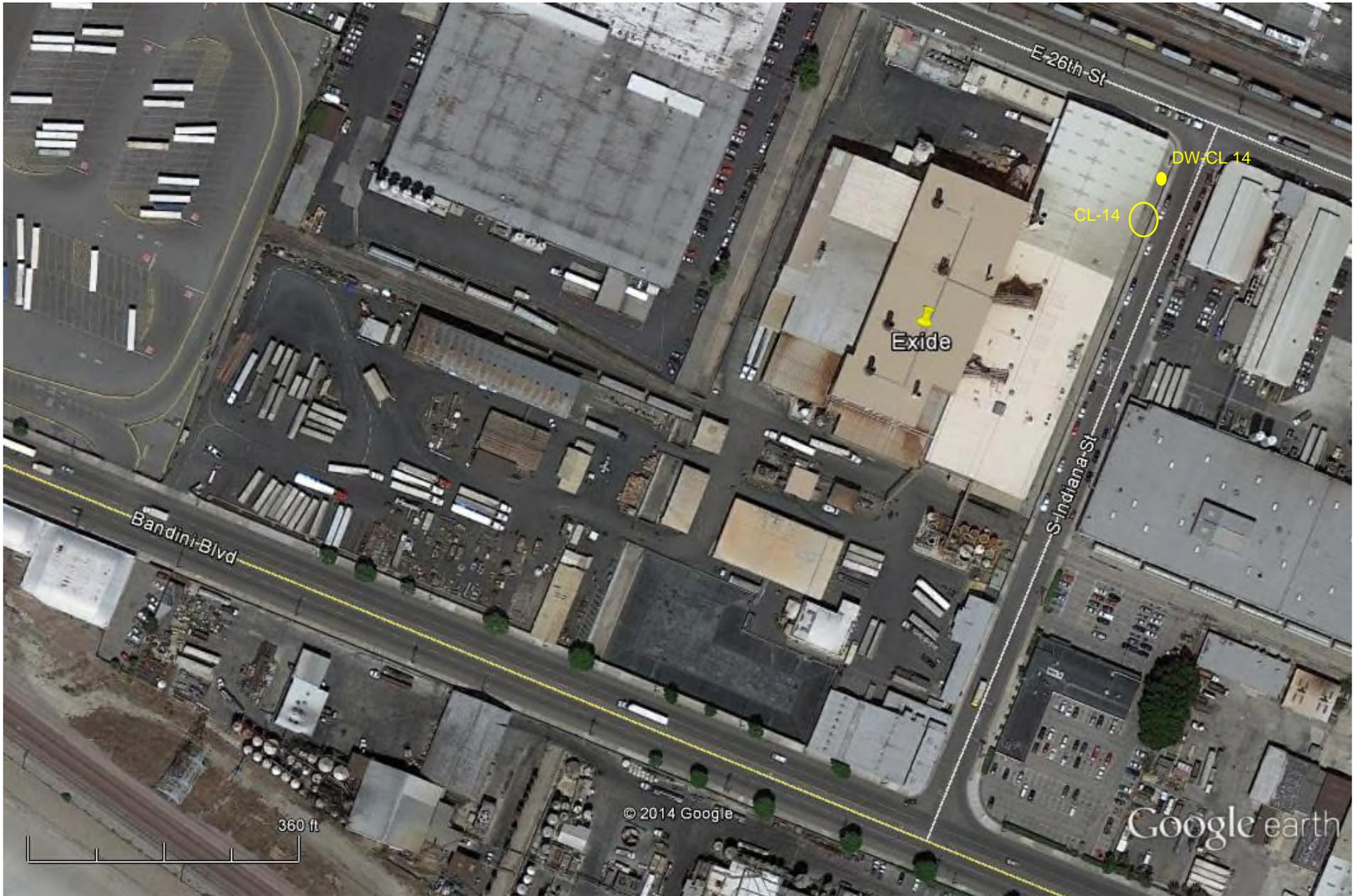
Numbering system correlates with Mitigation plan document. Ex refers to additional work part of Sec. 6b in the Mitigation plan document.

Mitigation Schedule and Map_070915.pptx



Monitoring Results / Reports
(Monday, July 6, 2015)

ACTIVITY	SERIAL NUMBER	LOCATION
EX73 Stormwater Manhole Repairs (CL-14)	8530151809	Downwind



Exide Technologies
2700 Indiana Street
Vernon, CA 90058

7/6/2015 Work Area EX-73

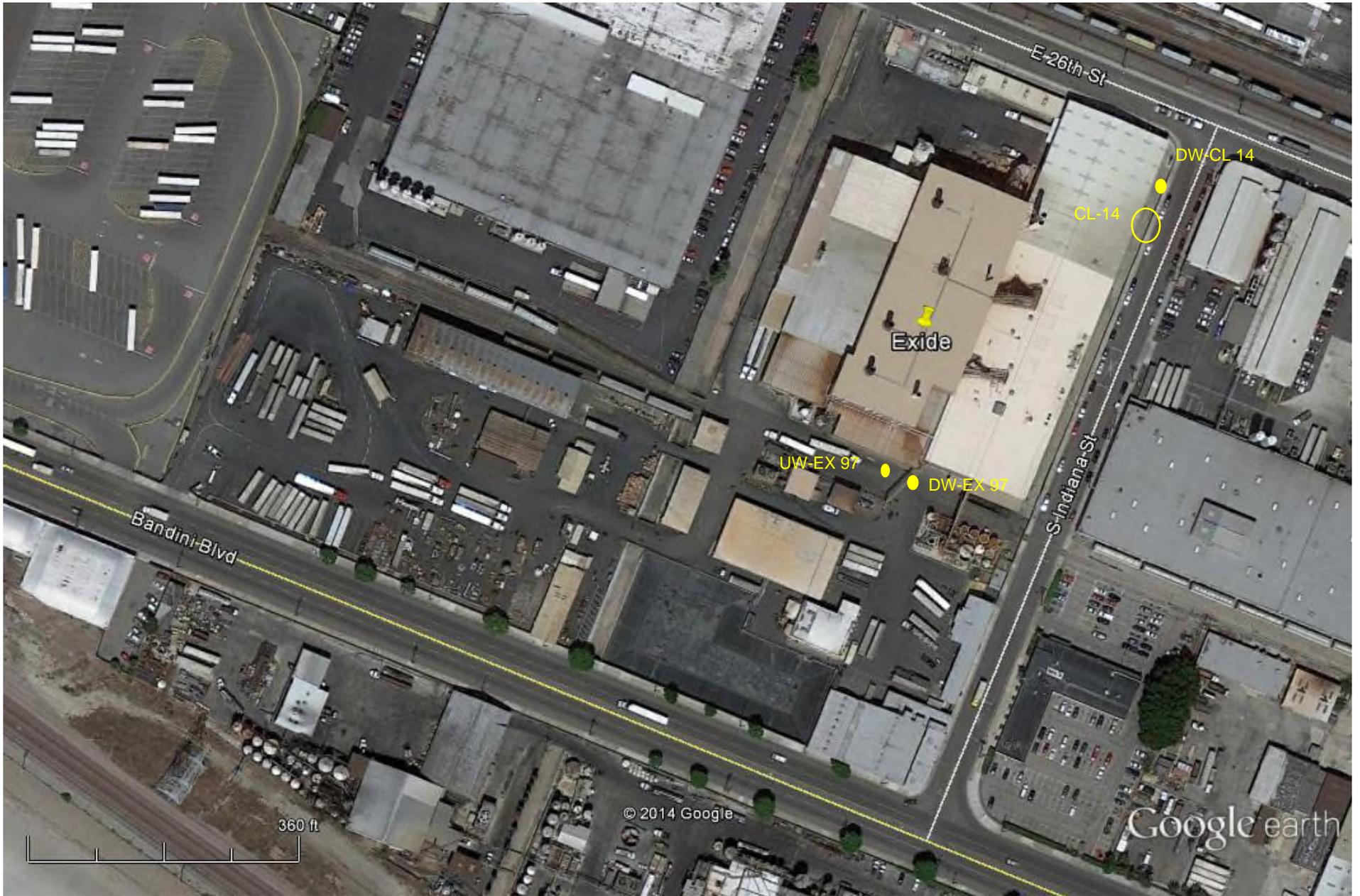
Test 021

Instrument		Data Properties	
Model	DustTrak II	Start Date	07/06/2015
Instrument S/N	8530151809	Start Time	10:13:25
		Stop Date	07/06/2015
		Stop Time	14:13:25
		Total Time	0:04:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	07/06/2015	10:28:25	0.063
2	07/06/2015	10:43:25	0.068
3	07/06/2015	10:58:25	0.066
4	07/06/2015	11:13:25	0.066
5	07/06/2015	11:28:25	0.071
6	07/06/2015	11:43:25	0.074
7	07/06/2015	11:58:25	0.067
8	07/06/2015	12:13:25	0.063
9	07/06/2015	12:28:25	0.066
10	07/06/2015	12:43:25	0.067
11	07/06/2015	12:58:25	0.063
12	07/06/2015	13:13:25	0.058
13	07/06/2015	13:28:25	0.056
14	07/06/2015	13:43:25	0.052
15	07/06/2015	13:58:25	0.048
16	07/06/2015	14:13:25	0.043

Monitoring Results / Reports
(Tuesday, July 7, 2015)

ACTIVITY	SERIAL NUMBER	LOCATION
EX97 Removal and Shipment of Blast Feed	8530151809	Upwind
EX97 Removal and Shipment of Blast Feed	8530113011	Downwind
EX73 Stormwater Manhole Repairs (CL-14)	8530151905	Downwind



Exide Technologies
2700 Indiana Street
Vernon, CA 90058

7/7/2015 Work Area EX-73 & EX-97

Test 022

Instrument		Data Properties	
Model	DustTrak II	Start Date	07/07/2015
Instrument S/N	8530151809	Start Time	07:33:45
		Stop Date	07/07/2015
		Stop Time	14:03:45
		Total Time	0:06:30:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	07/07/2015	07:48:45	0.085
2	07/07/2015	08:03:45	0.083
3	07/07/2015	08:18:45	0.071
4	07/07/2015	08:33:45	0.066
5	07/07/2015	08:48:45	0.069
6	07/07/2015	09:03:45	0.069
7	07/07/2015	09:18:45	0.075
8	07/07/2015	09:33:45	0.078
9	07/07/2015	09:48:45	0.071
10	07/07/2015	10:03:45	0.071
11	07/07/2015	10:18:45	0.077
12	07/07/2015	10:33:45	0.091
13	07/07/2015	10:48:45	0.095
14	07/07/2015	11:03:45	0.111
15	07/07/2015	11:18:45	0.086
16	07/07/2015	11:33:45	0.077
17	07/07/2015	11:48:45	0.081
18	07/07/2015	12:03:45	0.084
19	07/07/2015	12:18:45	0.079
20	07/07/2015	12:33:45	0.059
21	07/07/2015	12:48:45	0.043
22	07/07/2015	13:03:45	0.033
23	07/07/2015	13:18:45	0.031
24	07/07/2015	13:33:45	0.033
25	07/07/2015	13:48:45	0.046
26	07/07/2015	14:03:45	0.051

Test 024

Instrument		Data Properties	
Model	DustTrak II	Start Date	07/07/2015
Instrument S/N	8530151905	Start Time	06:15:13
		Stop Date	07/07/2015
		Stop Time	18:15:13
		Total Time	0:12:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	07/07/2015	06:30:13	0.077
2	07/07/2015	06:45:13	0.078
3	07/07/2015	07:00:13	0.073
4	07/07/2015	07:15:13	0.076
5	07/07/2015	07:30:13	0.072
6	07/07/2015	07:45:13	0.067
7	07/07/2015	08:00:13	0.063
8	07/07/2015	08:15:13	0.057
9	07/07/2015	08:30:13	0.050
10	07/07/2015	08:45:13	0.052
11	07/07/2015	09:00:13	0.054
12	07/07/2015	09:15:13	0.053
13	07/07/2015	09:30:13	0.057
14	07/07/2015	09:45:13	0.055
15	07/07/2015	10:00:13	0.055
16	07/07/2015	10:15:13	0.055
17	07/07/2015	10:30:13	0.067
18	07/07/2015	10:45:13	0.073
19	07/07/2015	11:00:13	0.071
20	07/07/2015	11:15:13	0.068
21	07/07/2015	11:30:13	0.062
22	07/07/2015	11:45:13	0.063
23	07/07/2015	12:00:13	0.066
24	07/07/2015	12:15:13	0.062
25	07/07/2015	12:30:13	0.056
26	07/07/2015	12:45:13	0.035
27	07/07/2015	13:00:13	0.026
28	07/07/2015	13:15:13	0.021
29	07/07/2015	13:30:13	0.023
30	07/07/2015	13:45:13	0.034
31	07/07/2015	14:00:13	0.037
32	07/07/2015	14:15:13	0.042
33	07/07/2015	14:30:13	0.042
34	07/07/2015	14:45:13	0.044
35	07/07/2015	15:00:13	0.044

Test Data			
Data Point	Date	Time	AEROSOL mg/m³
36	07/07/2015	15:15:13	0.044
37	07/07/2015	15:30:13	0.044
38	07/07/2015	15:45:13	0.044
39	07/07/2015	16:00:13	0.044
40	07/07/2015	16:15:13	0.044
41	07/07/2015	16:30:13	0.044
42	07/07/2015	16:45:13	0.040
43	07/07/2015	17:00:13	0.037
44	07/07/2015	17:15:13	0.039
45	07/07/2015	17:30:13	0.047
46	07/07/2015	17:45:13	0.050
47	07/07/2015	18:00:13	0.036
48	07/07/2015	18:15:13	0.028

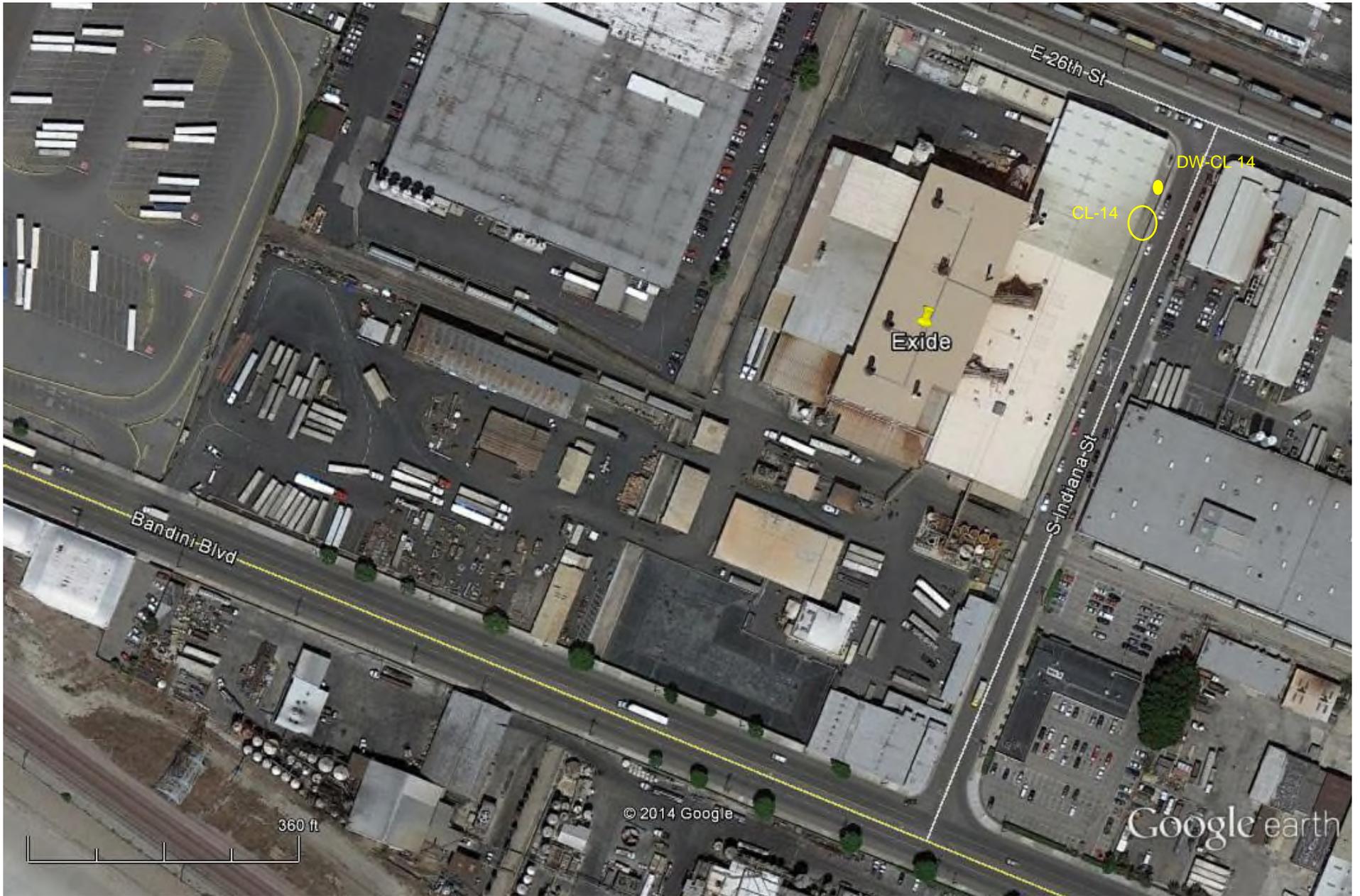
Test 136

Instrument		Data Properties	
Model	DustTrak II	Start Date	07/07/2015
Instrument S/N	8530113011	Start Time	07:33:02
		Stop Date	07/07/2015
		Stop Time	14:03:02
		Total Time	0:06:30:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	07/07/2015	07:48:02	0.079
2	07/07/2015	08:03:02	0.074
3	07/07/2015	08:18:02	0.063
4	07/07/2015	08:33:02	0.060
5	07/07/2015	08:48:02	0.062
6	07/07/2015	09:03:02	0.063
7	07/07/2015	09:18:02	0.068
8	07/07/2015	09:33:02	0.071
9	07/07/2015	09:48:02	0.067
10	07/07/2015	10:03:02	0.067
11	07/07/2015	10:18:02	0.072
12	07/07/2015	10:33:02	0.085
13	07/07/2015	10:48:02	0.088
14	07/07/2015	11:03:02	0.103
15	07/07/2015	11:18:02	0.081
16	07/07/2015	11:33:02	0.072
17	07/07/2015	11:48:02	0.076
18	07/07/2015	12:03:02	0.079
19	07/07/2015	12:18:02	0.075
20	07/07/2015	12:33:02	0.058
21	07/07/2015	12:48:02	0.043
22	07/07/2015	13:03:02	0.035
23	07/07/2015	13:18:02	0.033
24	07/07/2015	13:33:02	0.036
25	07/07/2015	13:48:02	0.050
26	07/07/2015	14:03:02	0.053

Monitoring Results / Reports
(Wednesday, July 8, 2015)

ACTIVITY	SERIAL NUMBER	LOCATION
EX73 Stormwater Manhole Repairs (CL-14)	8530151905	Downwind



Exide Technologies
2700 Indiana Street
Vernon, CA 90058

7/8/2015 Work Area EX- 73

Test 025

Instrument		Data Properties	
Model	DustTrak II	Start Date	07/08/2015
Instrument S/N	8530151905	Start Time	07:38:18
		Stop Date	07/08/2015
		Stop Time	11:38:18
		Total Time	0:04:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	07/08/2015	07:53:18	0.024
2	07/08/2015	08:08:18	0.024
3	07/08/2015	08:23:18	0.025
4	07/08/2015	08:38:18	0.024
5	07/08/2015	08:53:18	0.020
6	07/08/2015	09:08:18	0.020
7	07/08/2015	09:23:18	0.018
8	07/08/2015	09:38:18	0.017
9	07/08/2015	09:53:18	0.016
10	07/08/2015	10:08:18	0.015
11	07/08/2015	10:23:18	0.013
12	07/08/2015	10:38:18	0.014
13	07/08/2015	10:53:18	0.015
14	07/08/2015	11:08:18	0.015
15	07/08/2015	11:23:18	0.017
16	07/08/2015	11:38:18	0.022