



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 - www.aqmd.gov

March 29, 2014

Mr. John Hogarth
Plant Manager
Exide Technologies, Inc.
2700 South Indiana Street
Vernon, CA 90058

Re: Recent High Ambient Lead Levels and Rule 1420.1 Violations

Dear Mr. Hogarth:

Recent events at Exide during your planned shut down for maintenance and repair have resulted in numerous instances of significantly high daily ambient lead concentrations at both the North East and On-site North monitors, which have resulted in exceedances of the 0.15 ug/m³ rolling 30-day average ambient lead levels in violations of Rule 1420.1. Examples of those high measured daily readings which contributed to exceeding the Rule 1420.1 limit include:

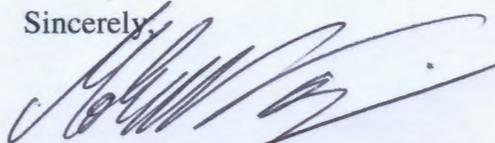
- March 21st, 22nd, 23rd and 24th at the North East monitoring station: 1.029 ug/m³, 1.185 ug/m³, 0.211 ug/m³, and 0.163 ug/m³, respectively; and
- March 21st and 24th at the On Site North sampler: 0.153 ug/m³ and 0.197 ug/m³, respectively.

Exide's inability to effectively mitigate fugitive lead emissions from the maintenance and repair operations conducted at Exide, have resulted in consecutive days for which Exide violated the requirements of Rule 1420.1 paragraph (d)(2) by exceeding the rolling 30-day average limit of 0.15 ug/m³ at the North East monitor. Those violations occurred on Saturday, March 22, 2014, Sunday, March 23, 2014 and again on Monday, March 24, 2014. For those days, Exide reported 30-day rolling average ambient air concentrations of lead of 0.159 ug/m³, 0.163 ug/m³ and 0.166 ug/m³, respectively.

Exide is hereby put on notice that once Exide learned about these violations, any daily ambient lead concentration readings above 0.15 ug/m³ from any ambient air monitoring locations around Exide that contribute to an exceedance of the rolling 30-day average in violation of Rule 1420.1 (d)(2), shall be considered as willful and knowing violations on the part of Exide. In addition, SCAQMD requests that Exide stop any further activities until Exide has put in place a mitigation plan to prevent any further exceedances.

Please be further advised that, it is requested that until further notice, ambient lead concentration data for all of the ambient air monitoring locations shall be electronically submitted to the SCAQMD on a daily basis, attention myself at mnazemi1@aqmd.gov and Edwin Pupka, Senior Enforcement Manager, at epupka@aqmd.gov.

Sincerely,



Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering and Compliance

MN:am

cc: Barry Wallerstein, Executive Officer, SCAQMD
Kurt Wiese, General Counsel, SCAQMD
Bayron Gilchrist, Assistant Chief Deputy Counsel, SCAQMD
Barbara Baird, Chief Deputy Counsel, SCAQMD