Respondent Exide Technologies ("Exide") files this combined Status Report in accordance with the two stipulated Orders for Abatement issued in Case No. 3151-29 and in Case No. 3151-32 on July 10, 2014 (modified January 13, 2015). This Status Report covers the period from December 13, 2014, to January 15, 2015 ("Update Period"), providing information to the Hearing Board on activities performed during this time period pursuant to the Risk Reduction Plan (subject of the Stipulated Order for Abatement in Case No. 3151-29) and Dust Mitigation Plan (subject of the Stipulated Order for Abatement in Case No. 3151-32).
I. STATUS REPORT ON CASE NO. 3151-29

A. Risk Reduction Projects

Exide previously reported that, on December 5, 2014, the District issued Exide a final permit to construct various modifications to Exide’s air pollution control system (“Risk Reduction Projects”). The specific Risk Reduction Projects are described in the Revised Final Risk Reduction Plan, submitted in August 2014.

During the Update Period, Exide worked on the following Risk Reduction Projects:

- Exide worked on the foundations that will be used to install the blast furnace wet scrubbing system;
- Exide worked on the foundations that will be used to install the rotary dryer regenerative thermal oxidizer (RTO);
- Exide prepared foundations and completed the installation of high-efficiency particulate absorption (HEPA) filters on its MAC baghouses;
- Exide worked on the foundations that will be used to install the blast furnace RTO;
- Exide worked on removing the existing partial blast furnace enclosure and started installation of the new blast furnace enclosure.

Exide has 180 days from the final permit issuance date of December 5, 2014 (i.e., until June 2, 2015) to complete the Risk Reduction Projects. (Order for Abatement 3151-29, p. 7, ¶ 1). Exide is currently on schedule to complete construction by that date. The District and Tetra-Tech (third-party oversight consultant) observed all Risk Reduction Project activities during this Update.
Period, and additional information regarding such activities can be found in Tetra-Tech’s weekly reports, which are posted on the District’s website.

B. Procedural Update

On December 24, 2014, the District filed a Petition for Modification of Order for Abatement, seeking to modify the Order to reflect changes to the Risk Reduction Plan since the Hearing Board’s adoption of an earlier Plan on July 10, 2014. In particular, the Risk Reduction Plan adopted in July 2014 called for routing the emissions from the hooding and enclosure at the top of the blast furnace charge chute through the afterburner, and then through the cooling system, the blast furnace baghouse, and the wet scrubbing system. After the July 10, 2014, Order, District and Exide engineering staff exchanged information and determined that it would be preferable and more efficient to install an RTO rather than an afterburner to control blast furnace emissions.

Exide submitted a Revised Final Risk Reduction Plan in August 2014, describing the proposed new RTO.

On January 13, 2015, after a hearing open to the public, this Hearing Board modified the Order for Abatement to incorporate the Revised Final Risk Reduction Plan. The Hearing Board also extended its jurisdiction over this matter until December 31, 2015.

II. STATUS REPORT ON CASE NO. 3151-32

A. Work Performed Under Dust Mitigation Plan

In order to reflect the new RTO described in the Revised Final Risk Reduction Plan, Exide submitted a revised Dust Mitigation Plan in August 2014. On September 9, 2014, Exide submitted minor additional revisions to the Dust Mitigation Plan at the District’s request ("Revised Dust Mitigation Plan").
Pursuant to the Revised Dust Mitigation Plan and under the oversight of the District and Tetra-Tech, Exide worked on the Risk Reduction Projects described above. Exide also performed maintenance work during this Update Period, including, but not limited to:

- Maintaining, repairing, and/or replacing various tanks, sumps, and pipes;
- Repairing manholes and working on the wastewater treatment system;
- Dust removal activities around the blast furnace enclosure and other areas.

Tetra-Tech prepares Weekly Status Reports detailing the Plant activities performed each week, setting forth the specific mitigation measures for each activity. These Reports are available on the District’s website. Tetra-Tech submitted five Weekly Status Reports during this Update Period, each confirming that Exide conducted work on the Risk Reduction Projects and maintenance activities in “full compliance with the previously approved mitigation measures under the Mitigation Plan.”
B. Procedural Update

On December 24, 2014, the District filed a Petition for Modification of Order for Abatement, seeking to modify the Order to incorporate the Revised Dust Mitigation Plan. On January 13, 2015, after a hearing open to the public, this Hearing Board modified the Order for Abatement to incorporate the Revised Dust Mitigation Plan. The Hearing Board also extended its jurisdiction over this matter until December 31, 2015.

Dated: January 15, 2015

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By

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EXIDE TECHNOLOGIES