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EXIDE TECHNOLOGIES

9
10 BEFORE THE HEARING BOARD OF THE
11 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
12

13 EXECUTIVE OFFICER OF THE SOUTH
COAST AIR QUALITY MANAGEMENT
14 DISTRICT,

15 Petitioner,

16 v.

17 EXIDE TECHNOLOGIES, INC., a Delaware
corporation,

18 Respondent.
19

Case Nos. 3151-29 and 3151-32

**JANUARY 2015 STATUS REPORT OF
RESPONDENT EXIDE TECHNOLOGIES
FILED IN ACCORDANCE WITH
STIPULATED ORDERS FOR
ABATEMENT**

20
21 Respondent Exide Technologies ("Exide") files this combined Status Report in accordance
22 with the two stipulated Orders for Abatement issued in Case No. 3151-29 and in Case No. 3151-
23 32 on July 10, 2014 (modified January 13, 2015). This Status Report covers the period from
24 December 13, 2014, to January 15, 2015 ("Update Period"), providing information to the Hearing
25 Board on activities performed during this time period pursuant to the Risk Reduction Plan (subject
26 of the Stipulated Order for Abatement in Case No. 3151-29) and Dust Mitigation Plan (subject of
27 the Stipulated Order for Abatement in Case No. 3151-32).
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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

1 Period, and additional information regarding such activities can be found in Tetra-Tech's weekly
2 reports, which are posted on the District's website.

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4 B. Procedural Update

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

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

18 **II.**
19 **STATUS REPORT ON CASE NO. 3151-32**

20 A. Work Performed Under Dust Mitigation Plan

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

- 4
- 5 ■ Maintaining, repairing, and/or replacing various tanks, sumps, and pipes;
- 6
- 7 ■ Repairing manholes and working on the wastewater treatment system;
- 8
- 9 ■ Dust removal activities around the blast furnace enclosure and other areas.

10

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

1 B. Procedural Update

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

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8 Dated: January 15, 2015

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By



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EXIDE TECHNOLOGIES

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