



June 21, 2017

CN: 15279

Mr. Scott Caso
 Senior Enforcement Manager
 Office of Compliance and Enforcement
 South Coast Air Quality Management District
 21865 Copley Drive
 Diamond Bar, CA 91765

SOUTH COAST AQMD
 CLERK OF THE BOARDS

JUN 21 P 3:00

**PROJECT: EXIDE TECHNOLOGIES FACILITY ID NO. 124838,
 ORDER FOR ABATEMENT CASE NO. 3151-32**
RE: WEEKLY STATUS REPORT # 140 (5/11/17 – 5/17/17)

Dear Mr. Caso,

Tetra Tech Inc. is pleased to present the following Weekly Status Report for the above referenced project. This report covers the period of May 11, 2017 through May 17, 2017.

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
EX127	Ship Generator and Auxiliary Equipment	HEPA vacuum, wet wipe, shrink wrap*

* 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.

Ship Generator and Auxiliary Equipment

On May 11, 2017, Exide personnel, and personnel from Crane Rental Service, an Exide contractor, loaded the large electrical power generator onto a lowboy trailer for shipment to their Muncie, Indiana Plant. The generator was previously cleaned and wrapped to prepare it for shipment on May 9, 2017 according to the procedures in the approved mitigation plan. A truck crane was utilized to lift the generator and place it on to the trailer. Once loaded onto the trailer the generator was strapped down and fully covered with tarps to protect it and the wrapping during transport. Castlerock personnel were onsite to patch the shrink wrapping if it was torn in the loading process. The lowboy trailer and semi-truck hauling it went through the tire truck wash upon entering the site and the truck and trailer wheels were water sprayed and hand wiped with cloth rags before it left the site. The truck crane, its belly dolly trailer, and its support truck and trailer all went through the truck tire wash for decontamination prior to leaving the site. The area where the generator was previously located was washed using the power floor scrubber by Exide personnel. Oversight activities conducted by Tetra Tech personnel included:

- Observation of decontamination of the truck and lowboy trailer upon site entry using the truck wheel wash.
- Observation of loading of the generator using a truck crane.
- Observation of the strapping and tarp covering of the generator to ensure that the plastic wrapping remained intact.
- Observation of vacuuming and washing of the pavement where the generator was previously located to removed dust, dirt, and debris.
- Observation of the truck crane and its support truck and trailer going through the truck tire wash prior to leaving the site.
- Observation of truck and trailer containing the generator having tires sprayed and hand wiped prior to leaving the site.
- Observation of the truck and trailer containing the generator being weighed prior to leaving the site and obtained copies of weight ticket and bill of lading for the shipment.
- Upwind and downwind dust monitoring was conducted using TSI DustTrak instruments. Monitoring activities did not identify fugitive dust being generated during the performance of the work activities.

Once the generator was loaded and left the site the loading and shipment of the auxiliary equipment commenced. The original EX-127 mitigation plan stated that the auxiliary equipment would be loaded onto the same trailer as the generator and all would be shipped together. Exide decided that the auxiliary equipment would be better shipped in a separate closed box van trailer and truck. Exide personnel contacted SCAQMD personnel to get a verbal agreement to this procedure change and then submitted a revised EX-127 with the proposed revisions. SCAQMD gave verbal and

email approval of the procedure change prior to the auxiliary equipment loading commencing. Exide personnel transported the six pieces of auxiliary equipment from the southeast materials warehouse to the blue lead storage warehouse loading dock using a forklift. The auxiliary equipment had previously been cleaned and shrink wrapped on May 9, 2017 to prepare them for shipment per the procedures in the mitigation plan. The truck with the enclosed box trailer arrived onsite and the six pieces of auxiliary equipment were loaded into the box trailer using fork lifts. Once loaded the equipment was secured inside the trailer with strapping and the truck and trailer went through the truck tire wash, and was weighed on the truck scale prior to leaving the site. Oversight activities conducted by Tetra Tech personnel included:

- Obtained copy of revised EX-127 Mitigation Plan and email from SCAQMD giving approval of the changes.
- Observation of movement of cleaned and wrapped auxiliary equipment from the materials warehouse to the blue lead warehouse loading dock using fork lifts.
- Observation of loading of the auxiliary equipment into enclosed box van trailer using fork lifts.
- Observation of the strapping of the auxiliary equipment to ensure that the plastic wrapping remained intact.
- Observation of the truck and trailer going through the truck tire wash prior to leaving the site.
- Observation of the truck and trailer containing the auxiliary equipment being weighed prior to leaving the site and obtained copies of weight ticket and bill of lading for the shipment.
- Upwind and downwind dust monitoring was conducted using TSI DustTrak instruments. Monitoring activities did not identify fugitive dust being generated during the performance of the work activities.

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 in the general area or 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 work activities conducted.

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
EX-127 Ship Generator and Auxiliary Equipment	On-Schedule

WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
May 18 – May 24	None

Week	Anticipated Activities
May 25 – May 31	None

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 May 11, 2017 through May 17, 2017. Tetra Tech was on-site Thursday, May 11, 2017 to attend the weekly planning meeting and to observe and monitor the EX-127 work activities.

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. Also attached are dust monitoring results and a map showing the dust monitoring locations.

Should you have questions regarding this report, or require additional information, please contact me at your earliest convenience.

Sincerely,



Greg Acosta, PE
Vice President, Environmental Services

ATTACHMENTS:

Gant Chart Schedule
Site Map
DustTrak Monitoring Data

Gant Chart Schedule

Project Schedule

Week of 05/11/17 – 06/01/17

Rev: 05/18/2017

 Recycling Division, Vernon, CA							05/08/2017							05/15/17							05/22/17							05/29/17						
							Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Ex 72	Cleaning of Assorted Materials in Total Enclosure	Total Enclosure	893 days	1/20/14	05/01/17	80%																												
Ex 76	Various Work Methods in Total Enclosure	Total Enclosure	892 days	1/22/14	05/01/17	80%																												
4	RCRA RFI Soil Sampling	General	13 days	1/07/16	05/01/17	97%																												
Ex 83	RFI Soil Sampling Supplemental	General	13 days	1/07/16	05/01/17	97%																												
Ex 115	Sediment Removal from EQ Tanks	WWTP	-	3/7/16	05/01/17	50%																												
Ex 127	Ship Generator and Auxiliary Equipment	West Yard	2 days	5/9/17	05/11/17	100%																												

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

Site Map



Mitigation Project Map Layout

Week **05/11/17 – 06/01/17**

Rev: **05/18/2017**

4. RCRA RFI Soil Sampling

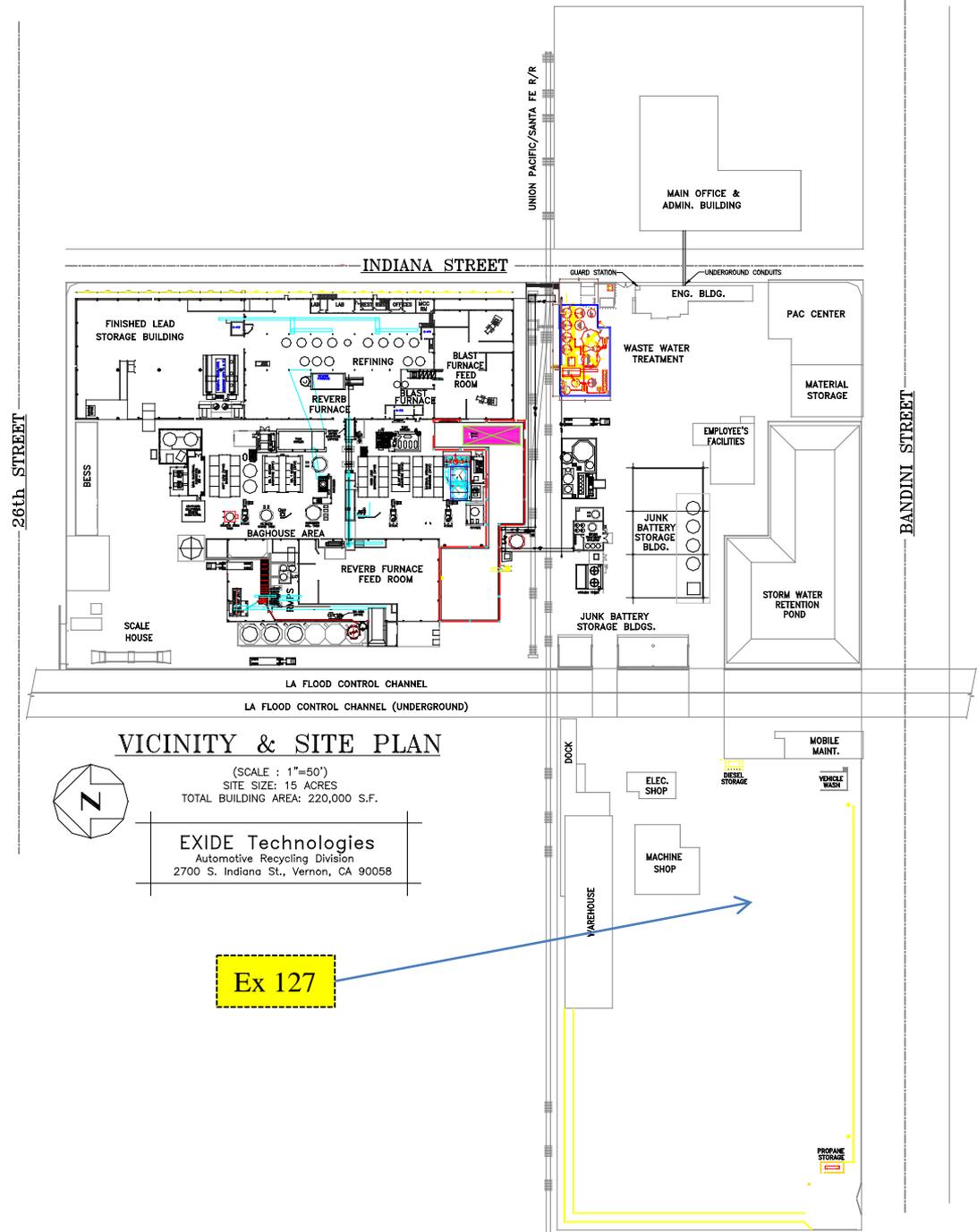
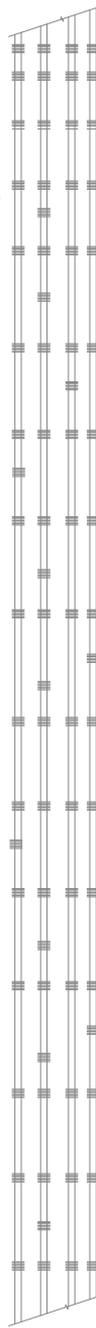
Ex 83. RFI Soil Sampling Supplemental

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 127 Ship Generator & Auxiliary Equipment

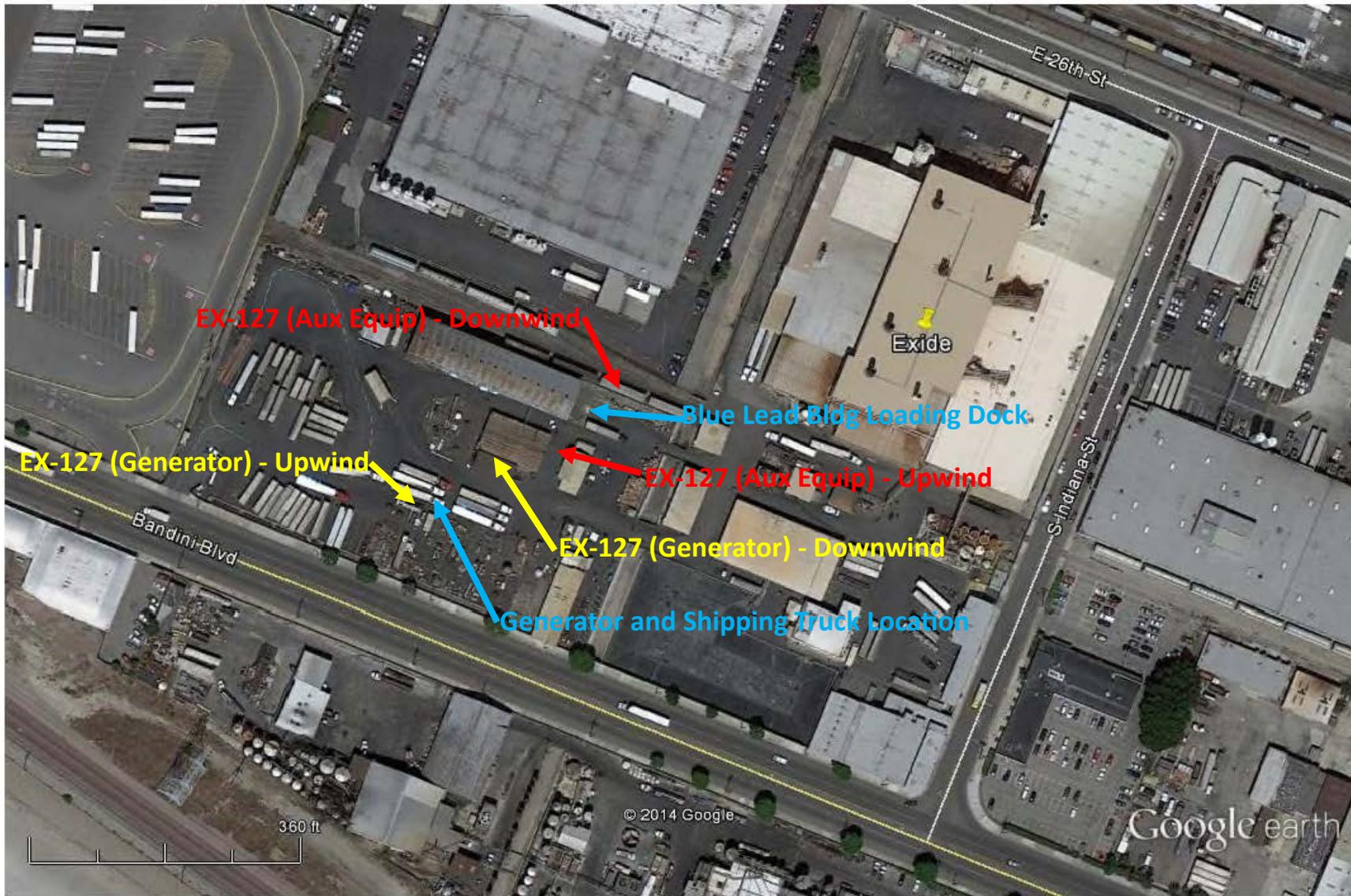


Numbering system correlates with Mitigation plan document. Ex refers to additional work part of Sec. 6b in the Mitigation plan document.

Monitoring Results / Reports
(Thursday, May 11, 2017)

ACTIVITY	SERIAL NUMBER	LOCATION	TIME SPAN
EX 127 – Ship Generator and Auxiliary Equipment	8532162611	Generator Loading (West Yard)- Upwind 1	7:08-8:53
EX 127 – Ship Generator and Auxiliary Equipment	8530094305	Generator Loading(West Yard)- Downwind 1	7:00-8:45
EX 127 – Ship Generator and Auxiliary Equipment	8532162611	Generator Loading(West Yard)- Upwind 2	9:11-10:41*
EX 127 – Ship Generator and Auxiliary Equipment	8530094305	Generator Loading(West Yard)- Downwind 2	9:06-12:21
EX 127 – Ship Generator and Auxiliary Equipment	8532162611	Auxiliary Equipment(Blue Lead Loading Dock)- Upwind	13:20-14:20
EX 127 – Ship Generator and Auxiliary Equipment	8530094305	Auxiliary Equipment Loading (Blue Lead Loading Dock)-Downwind	12:56-15:26

*Note- Battery issues with instrument serial number 8532162611 caused the upwind monitoring to be discontinued early for this task while the battery was changed.



Date: May 11, 2017

Activity: EX-127 Shipping Generator and Auxiliary Equipment

Locations: 1. West Yard 2. Blue Lead Bldg Loading Dock

Exide Technologies
2700 Indiana Street
Vernon, CA 90058

DustTrak Monitoring Locations

Test 001

Generator Loading (Upwind 1)

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/11/2017
Instrument S/N	8532162611	Start Time	06:53:27
		Stop Date	05/11/2017
		Stop Time	08:53:27
		Total Time	0:02:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/11/2017	07:08:27	0.034
2	05/11/2017	07:23:27	0.030
3	05/11/2017	07:38:27	0.027
4	05/11/2017	07:53:27	0.031
5	05/11/2017	08:08:27	0.030
6	05/11/2017	08:23:27	0.031
7	05/11/2017	08:38:27	0.045
8	05/11/2017	08:53:27	0.034

Test 001

Generator Loading (Downwind 1)

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/11/2017
Instrument S/N	8530094305	Start Time	06:45:55
		Stop Date	05/11/2017
		Stop Time	08:45:55
		Total Time	0:02:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/11/2017	07:00:55	0.020
2	05/11/2017	07:15:55	0.021
3	05/11/2017	07:30:55	0.017
4	05/11/2017	07:45:55	0.019
5	05/11/2017	08:00:55	0.020
6	05/11/2017	08:15:55	0.020
7	05/11/2017	08:30:55	0.021
8	05/11/2017	08:45:55	0.023

Test 002

Generator Loading (Upwind 2)

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/11/2017
Instrument S/N	8532162611	Start Time	08:56:41
		Stop Date	05/11/2017
		Stop Time	10:41:41
		Total Time	0:01:45:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/11/2017	09:11:41	0.037
2	05/11/2017	09:26:41	0.035
3	05/11/2017	09:41:41	0.033
4	05/11/2017	09:56:41	0.030
5	05/11/2017	10:11:41	0.024
6	05/11/2017	10:26:41	0.022
7	05/11/2017	10:41:41	0.021

Test 002

Generator Loading (Downwind 2)

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/11/2017
Instrument S/N	8530094305	Start Time	08:51:32
		Stop Date	05/11/2017
		Stop Time	12:21:32
		Total Time	0:03:30:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/11/2017	09:06:32	0.024
2	05/11/2017	09:21:32	0.028
3	05/11/2017	09:36:32	0.026
4	05/11/2017	09:51:32	0.023
5	05/11/2017	10:06:32	0.019
6	05/11/2017	10:21:32	0.016
7	05/11/2017	10:36:32	0.014
8	05/11/2017	10:51:32	0.015
9	05/11/2017	11:06:32	0.013
10	05/11/2017	11:21:32	0.015
11	05/11/2017	11:36:32	0.014
12	05/11/2017	11:51:32	0.015
13	05/11/2017	12:06:32	0.016
14	05/11/2017	12:21:32	0.018

Test 003

Auxiliary Equipment Loading (Upwind)

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/11/2017
Instrument S/N	8532162611	Start Time	13:01:58
		Stop Date	05/11/2017
		Stop Time	13:31:58
		Total Time	0:00:30:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/11/2017	13:16:58	0.027
2	05/11/2017	13:31:58	0.025

Test 003

Auxiliary Equipment Loading (Downwind)

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/11/2017
Instrument S/N	8530094305	Start Time	13:06:41
		Stop Date	05/11/2017
		Stop Time	13:36:41
		Total Time	0:00:30:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/11/2017	13:21:41	0.017
2	05/11/2017	13:36:41	0.017