



SCAQMD Advisory

Proposed Title V Permit Revision

Exide Technologies

You are receiving this advisory because of the interest you expressed to us previously regarding Exide Technologies (Facility ID 124838) located at 2700 S. Indiana Street, Vernon, CA. This advisory is also being published on the SCAQMD website (<http://www.aqmd.gov/home/regulations/compliance/exide-updates>).

The purpose of this advisory is to describe three (3) changes that are being proposed to be made to Exide's Title V permit, which are as follows:

1. Update Rule 1420.1 Compliance Plan for Closure Activities

SCAQMD's Rule 1420.1 requires that secondary lead smelter facilities that intend to shutdown/close file a Compliance Plan for Closure Activities. The plan is required to include all activities that will be conducted throughout the closure process that have the potential to create fugitive lead dust and includes measures that will be taken to minimize, contain, and control such potential fugitive lead dust from becoming airborne and polluting the air. Exide's Rule 1420.1 Compliance Plan for Closure Activities (Plan) was approved on May 26, 2017. The State of California's Department of Toxics Substance Control (DTSC) also has closure requirements for Exide that were approved in a separate Closure Plan and Closure Implementation Plan (CIP). The CIP contains certain requirements that were changed, clarified, and or improved and that now differ slightly from the existing Plan. As such, SCAQMD is proposing to update the existing Plan in the Title V permit to provide consistency with the DTSC's CIP so as to ensure that closure activities are performed with uniform and effective requirements for the control of potential fugitive lead dust.

2. Update Truck Wash Station Condition

Exide operates a truck wash station to wash and de-contaminate truck wheels before they leave the facility so they do not track out lead dust into the surrounding communities. During the facility

closure process, various types of trucks will be entering the facility for various purposes, and when these trucks leave the facility, it is desirable for them to go through the truck wash station for de-contamination prior to leaving the facility so that fugitive lead dust is not tracked out into the surrounding communities. Some trucks and their cargo may be too large to fit into the truck wash, and, sometimes the truck wash may be in-operable. Thus, it is being proposed for these instances that the trucks be properly washed manually in lieu of using the truck wash.

3. Add Four (4) New HEPA Vacuums

Exide is proposing to add four (4) new vacuums equipped with High Efficiency Particulate Arrestor (HEPA) filters. These vacuums will be used throughout the closure process to collect fugitive lead dust on the Exide premises and thus prevent it from becoming airborne and contaminating the ambient air.

All three of these proposed changes to Exide's Title V permit are considered a minor revision to the Title V permit under SCAQMD Regulation XXX. Still, the proposed changes will be sent to the U.S. Environmental Protection Agency (EPA) for review prior to final incorporation into Exide's Title V permit. Should you have any questions regarding any matters related to this advisory, please contact Mr. Ricardo A. Rivera, Senior Staff Specialist, at 909-396-3069.