

SOUTH COAST AGMS CLERK OF THE BOARDS

September 9, 2016

CN: 15279

16 SEP -9 A10:46

Ms. Cher Snyder
Assistant Deputy Executive Officer
Office of Engineering and Compliance
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

PROJECT: EXIDE TECHNOLOGIES FACILITY ID NO. 124838,

**ORDER FOR ABATEMENT CASE NO. 3151-32** 

**RE:** WEEKLY STATUS REPORT # 103 (8/25/16 – 8/31/16)

Dear Ms. Snyder,

Tetra Tech Inc. is pleased to present the following Weekly Status Report for the above referenced project. This report covers the period of August 25, 2016 through August 31, 2016.

## 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
EX 120	Remove Linde LOX Equipment	Pressure wash, Temporary Enclosure Under Negative Pressure*

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.

#### Removal of Linde LOX Equipment

Exide and its subcontractor began pressure washing the Linde LOX equipment on Monday, August 29, 2016. The equipment to be removed was cleaned, and all liquids generated were contained in accordance with the approved mitigation plan. Once pressure washing was complete, Alta Environmental collected wipe samples of the equipment as outlined in the DTSC approved workplan. On Tuesday, August 30, 2016, Castlerock began construction of the temporary enclosure around the base of the equipment so that it can be detached and removed from the site. Work was halted in the afternoon, and will resume once Exide receives results of the wipe tests. Removal activities will continue into the next reporting period. Tetra Tech personnel were onsite to monitor work related to the removal of the Linde LOX equipment including upwind and downwind Dust Trak monitoring.

#### Verification activities included:

- Visual observation of the removal activities to verify compliance with the SCAQMD approved mitigation plan.
- Upwind and Downwind Dust Trak monitoring of the areas when activities were conducted, to monitor for fugitive dust emissions. Review of Dust Trak data did not indicate that work associated with removal of the Linde LOX Equipment was generating fugitive dust emissions.

## 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

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 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 repair activities.

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
None	None

#### WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
Sept. 1 – Sept. 7	Remove Linde LOX Equipment

Week	Anticipated Activities
Sept. 8 - Sept. 14	Remove Linde LOX Equipment

#### **KEY MILESTONES:**

The following key milestones were achieved during this reporting period:

o Remove Linde LOX Equipment: BEGAN

#### **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 August 25, 2016 through August 31, 2016. Tetra Tech personnel were onsite to attend routine weekly meetings on Thursday, August 25, 2016, and Monday, August 29, 2016 and on Monday, August 29, 2016 and Tuesday, August 30, 2016 to observe activities associated with the removal of the Linde LOX equipment. 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.

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

Sincerely

Nick Somogyi Project Engineer

ATTACHMENTS:
Gant Chart Schedule
Site Map
Field Data Sheets

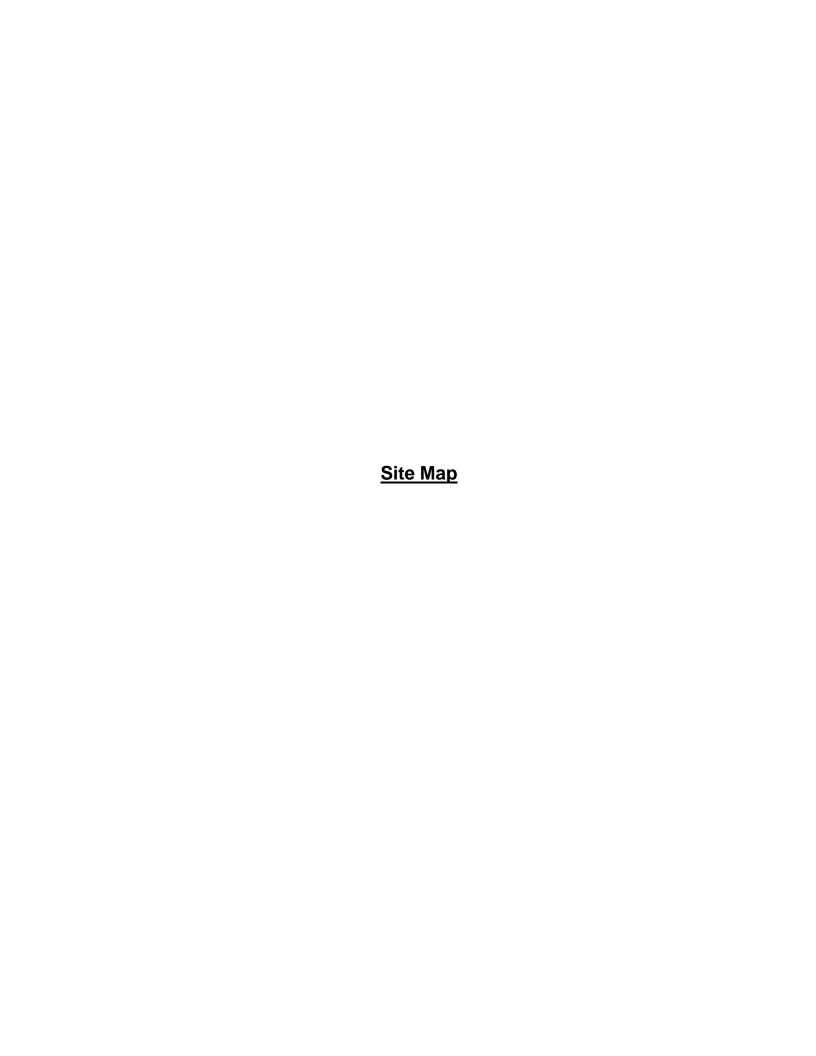


# Project Schedule Week of 08/24/16 – 09/15/16

Rev: 08/31/2016

EX TECHNO	DE Recycling Divis	sion, Vernon, CA					08/27/16	09/03/16	09/10/16	09/17/1
Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	24 25 26 27 28	29 30 31 01 02 03 04	05 06 07 08 09 10 1	11 12 13 14 15
Ex 72	Cleaning of Assorted Materials in Total Enclosure	Total Enclosure	772 days	11/20/14	12/31/16	80%				
Ex 76	Various Work Methods in Total Enclosure	Total Enclosure	771 days	11/21/14	12/31/16	80%				
4	RCRA RFI Soil Sampling	General	682 days	2/18/15	12/31/16	97%				
Ex 83	RFI Soil Sampling Supplemental	General	682 days	02/18/15	12/31/16	97%				
Ex 115	Sediment Removal from EQ Tanks	WWTP	5 days	3/7/16	12/31/16	50%				
Ex 120	Remove Linde LOX Equip	South of Total Enclosure	5 days	8/29/16	09/08/16	25%				

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





### **Mitigation Project Map Layout**

Week 08/24/16 - 09/15/16 Rev: 08/31/2016

4. RCRA RFI Soil Sampling

Ex 83. RFI Soil Sampling Supplemental

Ex 72. Cleaning of Assorted Materials in Total Encl.

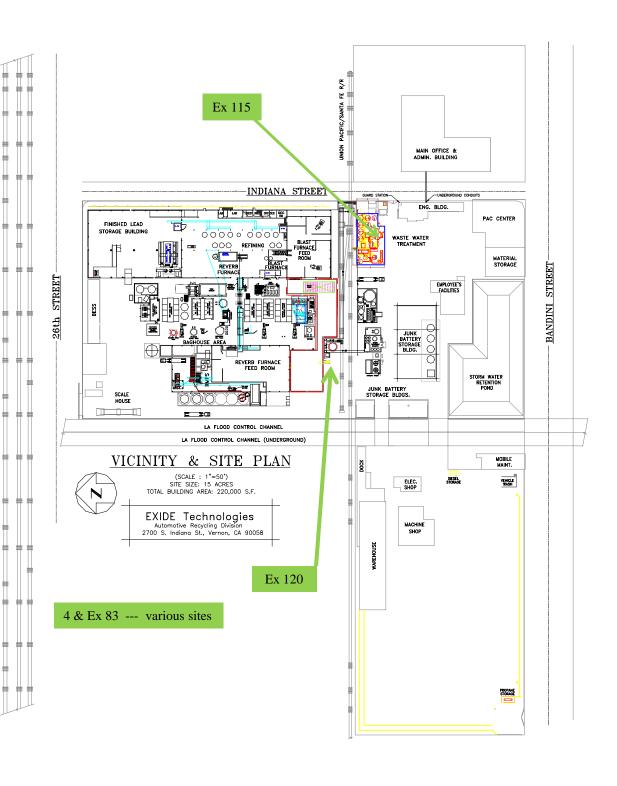
Ex 76. Various Work Methods in Total Enclosure

Ex 115. Sediment Removal from EQ Tanks

Ex 120 Remove Linde LOX Equip

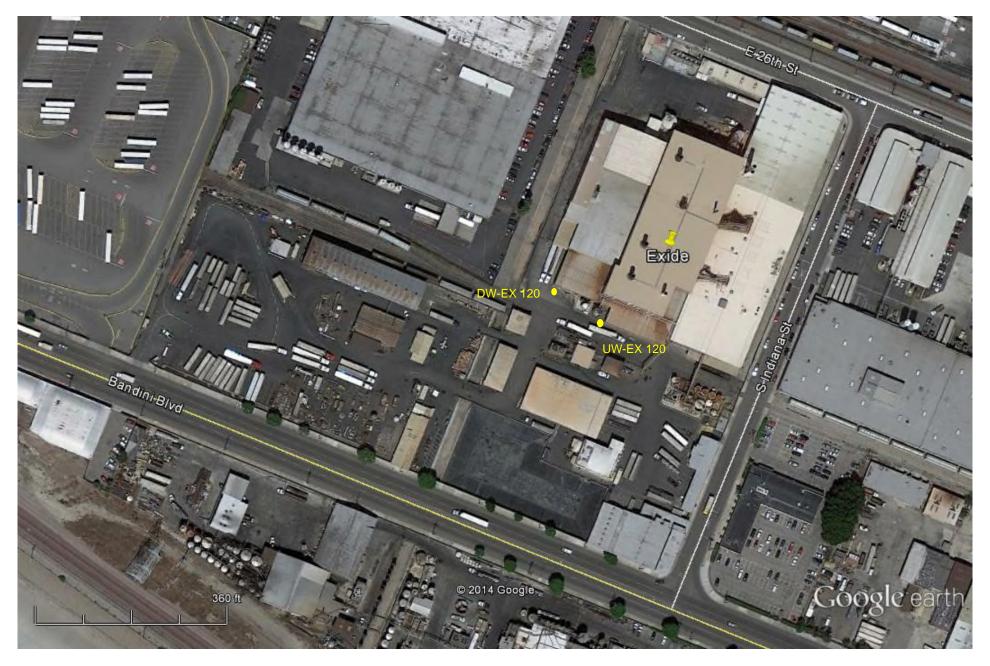
Numbering system correlates with Mitigation plan document. Ex refers to additional work part of Sec. 6b in the Mitigation plan document.

Mitigation Schedule and Map\_08/31/2016.pptx



## Monitoring Results / Reports (Monday, August 29, 2016)

ACTIVITY	SERIAL NUMBER	LOCATION	
EX 120 – Remove Linde LOX Equipment	8533151002	Upwind	
EX 120 – Remove Linde LOX Equipment	8533113401	Downwind	



Exide Technologies 2700 Indiana Street Vernon, CA 90058

8/29/2016 EX 120

## **Test 001**

Inst	rument	Data Properties		
Model	DustTrak DRX	Start Date	08/29/2016	
Instrument S/N	8533113401	Start Time	06:40:49	
		Stop Date	08/29/2016	
		Stop Time	14:55:49	
		Total Time	0:08:15:00	
			900 seconds	

				Test Data			
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3
1	08/29/2016	06:55:49	0.032	0.033	0.033	0.034	0.034
2	08/29/2016	07:10:49	0.034	0.035	0.035	0.036	0.036
3	08/29/2016	07:25:49	0.033	0.034	0.035	0.036	0.036
4	08/29/2016	07:40:49	0.035	0.036	0.036	0.037	0.037
5	08/29/2016	07:55:49	0.035	0.036	0.037	0.038	0.038
6	08/29/2016	08:10:49	0.034	0.035	0.035	0.036	0.036
7	08/29/2016	08:25:49	0.030	0.031	0.031	0.032	0.032
8	08/29/2016	08:40:49	0.031	0.032	0.032	0.033	0.033
9	08/29/2016	08:55:49	0.032	0.033	0.033	0.034	0.035
10	08/29/2016	09:10:49	0.033	0.034	0.035	0.037	0.038
11	08/29/2016	09:25:49	0.031	0.031	0.032	0.033	0.033
12	08/29/2016	09:40:49	0.033	0.033	0.034	0.035	0.035
13	08/29/2016	09:55:49	0.029	0.030	0.030	0.031	0.031
14	08/29/2016	10:10:49	0.041	0.041	0.042	0.043	0.043
15	08/29/2016	10:25:49	0.028	0.029	0.029	0.030	0.030
16	08/29/2016	10:40:49	0.031	0.032	0.032	0.034	0.034
17	08/29/2016	10:55:49	0.039	0.040	0.042	0.045	0.045
18	08/29/2016	11:10:49	0.029	0.029	0.030	0.031	0.032
19	08/29/2016	11:25:49	0.030	0.030	0.031	0.033	0.033
20	08/29/2016	11:40:49	0.030	0.030	0.031	0.032	0.032
21	08/29/2016	11:55:49	0.031	0.032	0.032	0.033	0.034
22	08/29/2016	12:10:49	0.033	0.033	0.033	0.035	0.035
23	08/29/2016	12:25:49	0.034	0.035	0.035	0.037	0.037
24	08/29/2016	12:40:49	0.035	0.035	0.036	0.037	0.038
25	08/29/2016	12:55:49	0.034	0.035	0.035	0.037	0.037
26	08/29/2016	13:10:49	0.034	0.035	0.035	0.036	0.037
27	08/29/2016	13:25:49	0.035	0.035	0.036	0.037	0.037
28	08/29/2016	13:40:49	0.034	0.035	0.035	0.036	0.036
29	08/29/2016	13:55:49	0.034	0.035	0.035	0.037	0.037
30	08/29/2016	14:10:49	0.033	0.033	0.034	0.035	0.036
31	08/29/2016	14:25:49	0.032	0.032	0.033	0.034	0.034
32	08/29/2016	14:40:49	0.032	0.032	0.033	0.034	0.034
33	08/29/2016	14:55:49	0.033	0.033	0.033	0.035	0.035

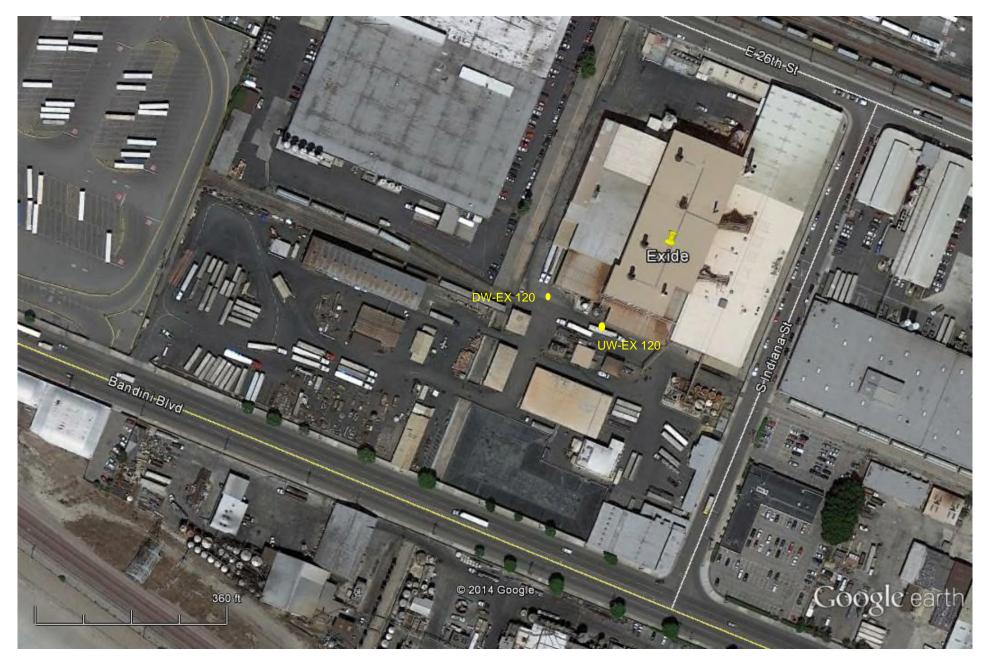
## **Test 001**

Insti	rument	Data Properties		
Model	DustTrak DRX	Start Date	08/29/2016	
Instrument S/N	8533151002	Start Time	07:00:54	
		Stop Date	08/29/2016	
		Stop Time	15:00:54	
		Total Time	0:08:00:00	
			900 seconds	

	Test Data							
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3	
1	08/29/2016	07:15:54	0.008	0.009	0.009	0.011	0.012	
2	08/29/2016	07:30:54	0.000	0.000	0.000	0.000	0.000	
3	08/29/2016	07:45:54	0.000	0.000	0.000	0.000	0.000	
4	08/29/2016	08:00:54	0.000	0.000	0.000	0.000	0.000	
5	08/29/2016	08:15:54	0.000	0.000	0.000	0.000	0.000	
6	08/29/2016	08:30:54	0.000	0.000	0.000	0.000	0.000	
7	08/29/2016	08:45:54	0.000	0.000	0.000	0.000	0.000	
8	08/29/2016	09:00:54	0.000	0.000	0.000	0.000	0.000	
9	08/29/2016	09:15:54	0.000	0.000	0.000	0.000	0.000	
10	08/29/2016	09:30:54	0.004	0.004	0.004	0.004	0.005	
11	08/29/2016	09:45:54	0.020	0.021	0.022	0.023	0.024	
12	08/29/2016	10:00:54	0.019	0.020	0.021	0.022	0.022	
13	08/29/2016	10:15:54	0.025	0.027	0.028	0.030	0.030	
14	08/29/2016	10:30:54	0.026	0.028	0.029	0.031	0.032	
15	08/29/2016	10:45:54	0.029	0.032	0.033	0.036	0.037	
16	08/29/2016	11:00:54	0.020	0.021	0.022	0.024	0.024	
17	08/29/2016	11:15:54	0.021	0.023	0.024	0.027	0.028	
18	08/29/2016	11:30:54	0.020	0.021	0.022	0.024	0.024	
19	08/29/2016	11:45:54	0.020	0.021	0.022	0.024	0.024	
20	08/29/2016	12:00:54	0.021	0.022	0.022	0.024	0.024	
21	08/29/2016	12:15:54	0.022	0.023	0.024	0.026	0.026	
22	08/29/2016	12:30:54	0.023	0.024	0.025	0.027	0.028	
23	08/29/2016	12:45:54	0.022	0.023	0.024	0.026	0.026	
24	08/29/2016	13:00:54	0.023	0.024	0.025	0.027	0.027	
25	08/29/2016	13:15:54	0.023	0.025	0.026	0.027	0.028	
26	08/29/2016	13:30:54	0.024	0.025	0.026	0.027	0.028	
27	08/29/2016	13:45:54	0.024	0.025	0.026	0.027	0.028	
28	08/29/2016	14:00:54	0.023	0.024	0.025	0.027	0.027	
29	08/29/2016	14:15:54	0.021	0.023	0.023	0.025	0.025	
30	08/29/2016	14:30:54	0.021	0.022	0.023	0.024	0.024	
31	08/29/2016	14:45:54	0.022	0.023	0.024	0.025	0.026	
32	08/29/2016	15:00:54	0.022	0.023	0.023	0.025	0.025	

## Monitoring Results / Reports (Tuesday, August 30, 2016)

ACTIVITY	SERIAL NUMBER	LOCATION
EX 120 – Remove Linde LOX Equipment	8533113401	Upwind
EX 120 – Remove Linde LOX Equipment	8533151002	Downwind



Exide Technologies 2700 Indiana Street Vernon, CA 90058

8/30/2016 EX 120

## **Test 002**

Instrument		Data Properties		
Model	DustTrak DRX	Start Date	08/30/2016	
Instrument S/N	8533113401	Start Time	07:19:13	
		Stop Date	08/30/2016	
		Stop Time	13:34:13	
		Total Time	0:06:15:00	
		Logging Interval	900 seconds	

Test Data							
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3
1	08/30/2016	07:34:13	0.072	0.073	0.074	0.081	0.083
2	08/30/2016	07:49:13	0.057	0.058	0.058	0.059	0.059
3	08/30/2016	08:04:13	0.068	0.069	0.069	0.070	0.070
4	08/30/2016	08:19:13	0.058	0.058	0.059	0.059	0.059
5	08/30/2016	08:34:13	0.053	0.053	0.054	0.054	0.054
6	08/30/2016	08:49:13	0.059	0.060	0.060	0.061	0.061
7	08/30/2016	09:04:13	0.074	0.074	0.075	0.075	0.075
8	08/30/2016	09:19:13	0.068	0.069	0.069	0.070	0.070
9	08/30/2016	09:34:13	0.066	0.067	0.067	0.068	0.068
10	08/30/2016	09:49:13	0.061	0.061	0.062	0.063	0.063
11	08/30/2016	10:04:13	0.059	0.059	0.059	0.060	0.060
12	08/30/2016	10:19:13	0.061	0.061	0.062	0.063	0.063
13	08/30/2016	10:34:13	0.061	0.061	0.062	0.063	0.063
14	08/30/2016	10:49:13	0.060	0.060	0.061	0.062	0.062
15	08/30/2016	11:04:13	0.068	0.069	0.071	0.075	0.075
16	08/30/2016	11:19:13	0.062	0.063	0.063	0.065	0.065
17	08/30/2016	11:34:13	0.057	0.057	0.058	0.059	0.059
18	08/30/2016	11:49:13	0.054	0.054	0.055	0.056	0.056
19	08/30/2016	12:04:13	0.053	0.053	0.054	0.055	0.055
20	08/30/2016	12:19:13	0.049	0.050	0.050	0.051	0.052
21	08/30/2016	12:34:13	0.047	0.047	0.048	0.049	0.049
22	08/30/2016	12:49:13	0.046	0.046	0.047	0.049	0.049
23	08/30/2016	13:04:13	0.044	0.045	0.045	0.047	0.047
24	08/30/2016	13:19:13	0.047	0.048	0.048	0.050	0.050
25	08/30/2016	13:34:13	0.045	0.045	0.046	0.047	0.047

## **Test 002**

Instrument		Data Properties		
Model	DustTrak DRX	Start Date	08/30/2016	
Instrument S/N	8533151002	Start Time	07:13:30	
		Stop Date	08/30/2016	
		Stop Time	13:28:30	
		Total Time	0:06:15:00	
		Logging Interval	900 seconds	

	Test Data						
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3
1	08/30/2016	07:28:30	0.057	0.059	0.060	0.061	0.062
2	08/30/2016	07:43:30	0.061	0.063	0.063	0.064	0.064
3	08/30/2016	07:58:30	0.047	0.049	0.050	0.051	0.051
4	08/30/2016	08:13:30	0.064	0.066	0.067	0.068	0.068
5	08/30/2016	08:28:30	0.044	0.046	0.046	0.047	0.047
6	08/30/2016	08:43:30	0.047	0.049	0.050	0.051	0.051
7	08/30/2016	08:58:30	0.060	0.062	0.063	0.064	0.064
8	08/30/2016	09:13:30	0.059	0.061	0.062	0.063	0.063
9	08/30/2016	09:28:30	0.060	0.062	0.063	0.064	0.064
10	08/30/2016	09:43:30	0.057	0.059	0.060	0.061	0.061
11	08/30/2016	09:58:30	0.055	0.057	0.058	0.059	0.059
12	08/30/2016	10:13:30	0.053	0.055	0.056	0.057	0.058
13	08/30/2016	10:28:30	0.052	0.054	0.054	0.056	0.056
14	08/30/2016	10:43:30	0.048	0.050	0.051	0.053	0.053
15	08/30/2016	10:58:30	0.049	0.051	0.052	0.055	0.055
16	08/30/2016	11:13:30	0.049	0.051	0.052	0.054	0.054
17	08/30/2016	11:28:30	0.045	0.047	0.048	0.050	0.050
18	08/30/2016	11:43:30	0.040	0.042	0.043	0.045	0.045
19	08/30/2016	11:58:30	0.040	0.041	0.042	0.045	0.045
20	08/30/2016	12:13:30	0.035	0.037	0.038	0.040	0.040
21	08/30/2016	12:28:30	0.033	0.034	0.035	0.037	0.037
22	08/30/2016	12:43:30	0.031	0.033	0.033	0.035	0.036
23	08/30/2016	12:58:30	0.030	0.031	0.032	0.034	0.034
24	08/30/2016	13:13:30	0.031	0.033	0.034	0.036	0.036
25	08/30/2016	13:28:30	0.030	0.032	0.033	0.034	0.035