

SOUTH COAST AQMD  
CLERK OF THE BOARDS

May 3, 2017

CN: 15279

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Mr. Scott Caso  
Senior Enforcement Manager  
Office of Compliance and Enforcement  
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 # 132 (3/16/17 – 3/22/17)**

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 March 16, 2017 through March 22, 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
EX 124	Remove New CEMS Unit	HEPA Vacuum and Shrink Wrap*
EX 125	Remove New Brick	HEPA Vacuum and 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 waste water treatment activities.

### Remove New CEMS Unit

On March 16, 2017, Exide personnel loaded the new CEMS unit onto a truck for shipment to their Munsee Indiana plant. Tetra Tech personnel observed and documented that the shipping activities were completed in accordance with the approved mitigation plan. Observation activities performed by Tetra Tech personnel included:

- Witnessed the inspection of the truck hauling the CEMS Unit to Munsee, and confirmed that it was inspected prior to loading.
- Witnessed the loading of the CEMS Unit and final inspection of the truck performed by Alta Environmental.
- Witnessed and obtained a copy of the weight ticket for the shipment.
- Witnessed and observed the shipping vehicle pass through the wheel wash.
- Upwind and downwind Dustrak monitors were deployed upwind and downwind of the blue lead warehouse loading dock while the CEMS Unit was loaded onto the truck for shipment. Monitoring activities did not identify fugitive dust being generated during performance of the activities.

### Remove New Brick

On March 16, 2017, Exide personnel loaded the 15 pallets of new brick onto a truck for shipment to their Munsee Indiana plant. Tetra Tech personnel observed and documented the shipping activities were completed in accordance with the approved mitigation plan. Observation activities performed by Tetra Tech personnel included:

- Witnessed the inspection of the truck hauling the new brick to Munsee, and confirmed that it was inspected prior to loading.
- Witnessed the loading of the new brick and final inspection of the truck performed by Alta Environmental.
- Witnessed and obtained a copy of the weight ticket for the shipment.
- Witnessed and observed the shipping vehicle pass through the wheel wash.
- Upwind and downwind Dust Trak monitors were deployed upwind and downwind of the blue lead warehouse loading dock while the 15 pallets of new brick were loaded onto the truck for shipment. Monitoring activities did not identify fugitive dust being generated during performance of these 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 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
Mar. 23 – Mar. 29	<ul style="list-style-type: none"> <li>None at this time</li> </ul>

Week	Anticipated Activities
Mar. 30 - Apr. 5	<ul style="list-style-type: none"> <li>None at this time</li> </ul>

**KEY MILESTONES:**

The following key milestones were achieved during this reporting period:

- Remove New CEMS Unit: COMPLETE
- Remove New Brick: COMPLETE

**WORKER SAFETY CONCERNS:**

The following Health and Safety issues, as they apply to Tetra Tech employees, were observed during this reporting period:

- None.

**POTENTIAL CHANGES AND ACTION ITEMS REQUIRING RESOLUTION:**

The following items require resolution:

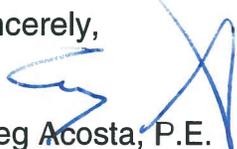
- None at this time.

**SUMMARY:**

The summary provided herein covers the activities for the period of March 16, 2017 through March 22, 2017. Tetra Tech was on site Thursday, March 16, 2017 for a weekly meeting and to observe the Removal of the CEMS Unit and Removal of New Brick. Tetra Tech personnel were on Monday, March 20, 2017 to facilitate pick up of rental Dust Trak monitoring 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,



Greg Acosta, P.E.  
Vice President, Environmental Services Division

**ATTACHMENTS:**

Gant Chart Schedule  
Site Map  
Dust Trak Monitoring Data

## **Gant Chart Schedule**

# Project Schedule

## Week of 02/23/17 – 03/16/17

*Rev: 3/20/2017*



Recycling Division, Vernon, CA

							17		02/26/17					03/05/17					03/12/17									
Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	23	24	25	26	27	28	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16
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	13 days	11/07/16	11/23/16	97%																						
Ex 83	RFI Soil Sampling Supplemental	General	13 days	11/07/16	11/23/16	97%																						
Ex 115	Sediment Removal from EQ Tanks	WWTP	-	3/7/16	12/31/16	50%																						

*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 02/23/17 – 03/16/17

Rev: 03/02/2017

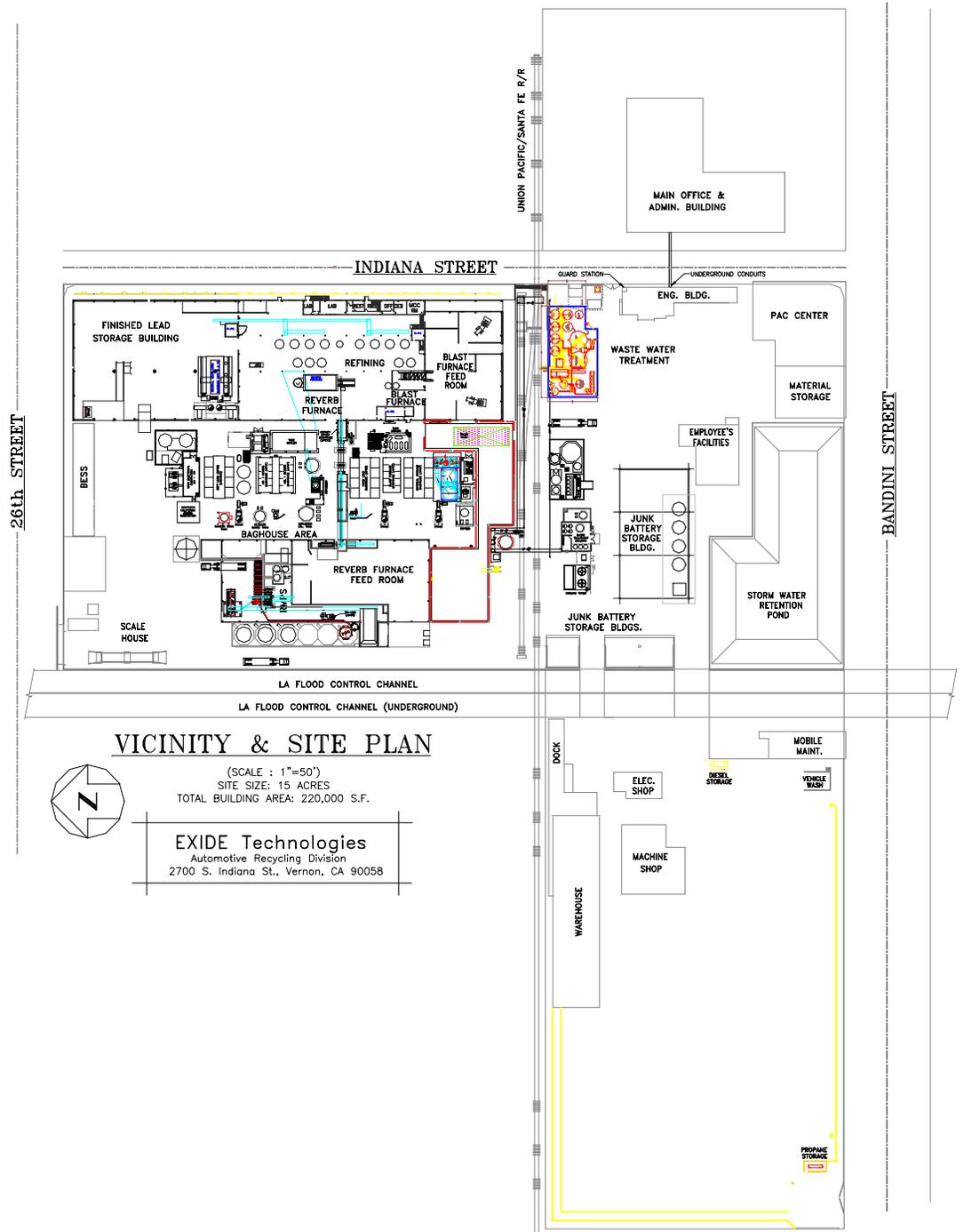
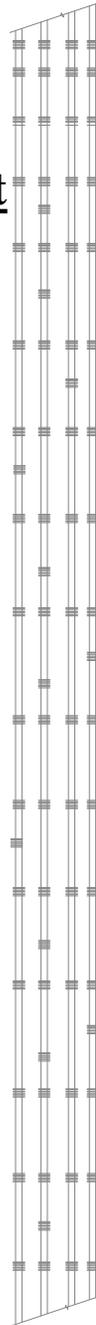
### 4. RCRA RFI Soil Sampling

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



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\_03/02/2017pptx

**Monitoring Results / Reports**  
**(Thursday, March 16, 2017)**

<b>ACTIVITY</b>	<b>SERIAL NUMBER</b>	<b>LOCATION</b>
EX 125 – Remove New Brick	8533103901	Upwind
EX 125 – Remove New Brick	8533130908	Downwind



Exide Technologies  
2700 Indiana Street  
Vernon, CA 90058

3/16/2017 EX-124 & EX-125

# Test 004

Instrument		Data Properties	
Model	DustTrak DRX	Start Date	03/16/2017
Instrument S/N	8533130908	Start Time	08:08:09
		Stop Date	03/16/2017
		Stop Time	11:12:09
		Total Time	0:03:04:00
		Logging Interval	900 seconds

Test Data							
Data Point	Date	Time	PM1 mg/m <sup>3</sup>	PM2.5 mg/m <sup>3</sup>	RESP mg/m <sup>3</sup>	PM10 mg/m <sup>3</sup>	TOTAL mg/m <sup>3</sup>
1	03/16/2017	08:23:09	0.056	0.057	0.058	0.059	0.060
2	03/16/2017	08:38:09	0.056	0.057	0.058	0.059	0.059
3	03/16/2017	08:53:09	0.055	0.057	0.057	0.059	0.059
4	03/16/2017	09:08:09	0.061	0.063	0.063	0.065	0.066
5	03/16/2017	09:23:09	0.052	0.053	0.054	0.055	0.056
6	03/16/2017	09:38:09	0.053	0.054	0.055	0.057	0.058
7	03/16/2017	09:53:09	0.047	0.049	0.049	0.051	0.052
8	03/16/2017	11:12:13	0.000	0.000	0.000	0.000	0.000

# Test 005

Instrument		Data Properties	
Model	DustTrak DRX	Start Date	03/16/2017
Instrument S/N	8533103901	Start Time	08:01:42
		Stop Date	03/16/2017
		Stop Time	09:46:42
		Total Time	0:01:45:00
		Logging Interval	900 seconds

Test Data							
Data Point	Date	Time	PM1 mg/m <sup>3</sup>	PM2.5 mg/m <sup>3</sup>	RESP mg/m <sup>3</sup>	PM10 mg/m <sup>3</sup>	TOTAL mg/m <sup>3</sup>
1	03/16/2017	08:16:42	0.053	0.053	0.054	0.054	0.054
2	03/16/2017	08:31:42	0.055	0.055	0.055	0.056	0.056
3	03/16/2017	08:46:42	0.055	0.055	0.055	0.056	0.056
4	03/16/2017	09:01:42	0.054	0.055	0.055	0.055	0.055
5	03/16/2017	09:16:42	0.050	0.051	0.051	0.051	0.051
6	03/16/2017	09:31:42	0.047	0.047	0.048	0.048	0.048
7	03/16/2017	09:46:42	0.047	0.047	0.047	0.048	0.048