

February 6, 2015

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Mr. Edwin L. Pupka
 Senior Enforcement Manager
 Office of Engineering and Compliance
 South Coast Air Quality Management District
 21865 Copley Drive
 Diamond Bar, CA 91765

**PROJECT: EXIDE TECHNOLOGIES FACILITY ID NO. 124868,
 ORDER OF ABATEMENT CASE NO. 3151-32**
RE: WEEKLY STATUS REPORT # 21 (1/29/15 – 2/4/15)

Dear Mr. Pupka,

Tetra Tech Inc. is pleased to present the following Weekly Status Report for the above referenced project. This report covers the period of January 29, 2015 through February 4, 2015.

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) currently under way or completed 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 Construction of Risk Reduction Measures, 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)
2a	Dust Removal	Total Enclosure Building Under Negative Pressure
EX 43	West Yard Sump Piping	None Required
2d	Installation of High Speed Doors	Total Enclosure Building Under Negative Pressure
3c	Replacement of Blast Furnace Partial Enclosure	Total Enclosure Building Under Negative Pressure
5b	Blast Furnace Activities	Total Enclosure Building Under Negative Pressure
3a	Blast Furnace Tray Type Wet Scrubbing System Installation	Total Enclosure Building Under Negative Pressure
3g	Reverb Furnace Feed Modification	Total Enclosure Building Under Negative Pressure
3i	Installation of Rotary Dryer Regenerative Thermal Oxidizer	Total Enclosure Building Under Negative Pressure
EX 73	Stormwater Repair – 3 Manholes	Temporary Enclosure Under Negative Pressure*

Tetra Tech BAS, Inc.

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TASK ID	Major Work Item	Mitigation Measure(s)
EX 84	Repurposing of North Reverb Baghouse	Total Enclosure Building Under Negative Pressure
EX 86 / 3k	Installation of Blast RTO	Total Enclosure Building Under Negative Pressure
EX 88	Reverb Feed Room/ Corridor Floors	Total Enclosure Building Under Negative Pressure
EX 33	Building Negative Pressure Monitoring Upgrade	Use of Self Tapping Screws, Pre-Cleaning of Area
3b	Hard Lead System Ventilation Modification	Total Enclosure Building Under Negative Pressure
3f	Blast Furnace Slag Tap Ventilation Hood Modification	Total Enclosure Building Under Negative Pressure
EX 90	Repair to Reaction Tank Piping in Waste Water Treatment	Temporary Enclosure Under Negative Pressure
EX 91	Acid Collection Sump #4 in Battery Storage Area Unit #3	Temporary Enclosure Under Negative Pressure

Dust Removal

National Response Corporation (NRC) did not perform any dust removal activities during this reporting period. NRC is scheduled to resume dust removal activities in an upcoming reporting period.

West Yard Sump Piping

No work occurred on the West Yard Sump Piping during this reporting period. Exide is awaiting Department of Toxic Substances Control (DTSC) review and comment on proposed piping modification prior to completion of this task. This activity does not require a temporary negative pressure enclosure because no work is being performed that has the potential to generate dust.

Installation of High Speed Doors

Vortex Construction completed installation of the high speed door in the southern portion of the baghouse building on January 30, 2015. Installation of the north high speed door is scheduled for the next reporting period.

Tetra Tech personnel were onsite to observe the installation activities and housekeeping activities. Verification activities included:

- Verification that the Total Enclosure Building was maintained under negative pressure
- Periodic visual observation of the installation activities

Blast Furnace Activities and Replacement of Blast Furnace Partial Enclosure

Advanced Construction resumed work in the Blast Furnace Partial Enclosure on Thursday, January 29, 2015, and continued installing the sheeting for the new Blast Furnace Partial Enclosure. This work will continue in the next reporting period.

Tetra Tech personnel were onsite to observe the installation activities and housekeeping activities. Verification activities included:

- Verification that the Total Enclosure Building was maintained under negative pressure and vented to operational air pollution control equipment during all observed activities.
- Periodic visual observation of the installation activities to confirm compliance with the supplemental mitigation plan.

Blast Furnace Tray Type Wet Scrubbing System

No work occurred on the blast furnace tray type wet scrubbing system during this reporting period. Work will resume in the upcoming reporting period.

Reverb Furnace Feed Modification

No work occurred on the reverb furnace feed modification during this reporting period. Work will resume in the upcoming reporting period.

Installation of the Rotary Dryer Regenerative Thermal Oxidizer (RTO)

Advanced Construction and Baghouse Services continued installation activities on Thursday, January 29, 2015. Installation activities will continue into the next reporting period.

Tetra Tech personnel were onsite to observe operations. Verification activities included:

- Verification that the Total Enclosure Building was maintained under negative pressure and vented to operational air pollution control equipment during all observed activities.
- Observation of activities being performed using wet methods.

Stormwater Repair – 3 Manholes

Innovative Construction Solutions (ICS) resumed work at manhole CL-14 on Tuesday, February 3, 2015, making repairs to the stormwater pipe. Repair activities will continue into the next reporting period.

Verification activities included:

- Upwind and Downwind Dust Trak monitoring on the temporary enclosure when repair activities were conducted within the enclosures, to monitor for fugitive dust emissions. Review of Dust Trak data did not indicate that work associated with the stormwater manhole repair project was generating fugitive dust emissions.
- Confirmation that negative pressure was maintained by checking the gauge on the temporary enclosure.

- Periodic visual inspection of the temporary enclosure to confirm that no visible leaks or tears were present, that the structural integrity of the enclosures were maintained and that they were under negative pressure and vented to a SCAQMD permitted HEPA filtration system. Any noted areas where seams needed to be re-taped were repaired by Castlerock prior to resuming work within the enclosure. Seams that needed re-taping were identified during the periodic inspection by Tetra Tech personnel or when a drop in negative pressure was noted. Any observed conditions requiring repair were addressed immediately.

Repurposing of North Reverb Bag House

Exide personnel resumed activities on Thursday, January 29, 2015, for the repurposing of the North Reverb Bag House. National Coating continued to sand blast the interior of the North Reverb Baghouse. National Coating's sand blasting activities will continue into the next reporting period.

Verification activities included:

- Verification that the Total Enclosure Building was maintained under negative pressure and vented to operational air pollution control equipment during all observed activities.

Installation of Blast RTO

Advanced Construction continued installation activities on Thursday, January 29, 2015, for the installation of the new RTO for the Blast Furnace. Activities included installation of rebar, pouring the concrete foundation for the new RTO.

Tetra Tech personnel were onsite to observe operations. Verification activities included:

- Verification that the Total Enclosure Building was maintained under negative pressure and vented to operational air pollution control equipment during all observed activities.

Reverb Feedroom/Corridor Floors

Advanced Construction continued preparation of the Reverb Feedroom and corridor floors on Thursday, January 29, 2015. Feed from the southern portion of the Reverb Feedroom was stockpiled onto a geomembrane liner in the northern area. The stockpiling of feed and maintenance of the stockpiles will continue into the next reporting period.

Tetra Tech personnel were onsite to observe operations. Verification activities included:

- Verification that the Total Enclosure Building was maintained under negative pressure and vented to operational air pollution control equipment during all observed activities.

Building Negative Pressure Monitoring Upgrade

Southwest Industrial Electric continued installation activities on January 29, 2015. Activities include the installing programming and wireless communication. The negative pressure monitoring upgrades will continue into the next reporting period.

Hard Lead System Ventilation Modification

No work was performed on the Hard Lead System Ventilation Modification during this reporting period. Work will resume in the next reporting period.

Blast Furnace Slag Tap Ventilation Hood Modification

No work was performed on the Blast Furnace Slag Tap Ventilation Hood Modification during this reporting period. Work will resume in the next reporting period.

Repair to Reaction Tank Piping in Waste Water Treatment

Castlerock Environmental mobilized to the site on Tuesday, February 3, 2015, to begin construction of a temporary enclosure. Repair activities within the enclosure will begin during the next reporting period, after Tetra Tech personnel have verified that the temporary enclosure is complete, maintained under negative pressure and vented to a permitted HEPA filtration system.

Acid Collection Sump #4 in Battery Storage Area #3

Castlerock Environmental mobilized to the site on Tuesday, February 3, 2015, to begin construction of a temporary enclosure. Repair activities within the enclosure will begin during the next reporting period, after Tetra Tech personnel have verified that the temporary enclosure is complete, maintained under negative pressure and vented to a permitted HEPA filtration system.

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 Construction of Risk Reducing Measures, 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 was not required since work was not performed outside in temporary enclosures.

Activity Which Resulted in Excessive Dust	Additional Suppression Activity
Not Applicable	Not Applicable

WORKER SAFETY CONCERNS:

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

- o 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
Dust Removal	Ongoing – on hold
West Yard Sump Piping	Ongoing - on hold
Installation of High Speed Doors	Ongoing
Replacement of Blast Furnace Partial Enclosure	Ongoing
Blast Furnace Activities	Ongoing
Blast Furnace Tray Type Wet Scrubbing System Installation	Ongoing – on hold
Reverb Furnace Feed Modification	Ongoing – on hold
Installation of Rotary Dryer Regenerative Thermal Oxidizer	Ongoing
Storm Water Repair – 3 Manholes	Ongoing
Repurposing of North Reverb Baghouse	Ongoing
Installation of Blast RTO	Ongoing
Reverb Feed Room/Corridor Floors	Ongoing
Building Negative Pressure Monitoring Upgrade	Ongoing
Hard Lead System Ventilation Hood Modification	Ongoing – on hold
Blast Furnace Slag Tap Ventilation Hood Modification	Ongoing – on hold
Repair to Reaction Tank Piping in Waste Water Treatment	Started
Acid Collection Sump #4 in Battery Storage Area #3	Started

WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
Feb. 5 – Feb. 11	<ul style="list-style-type: none"> • Dust Removal Continues • Storm Water Repair 3 Manholes Continues • Blast Furnace Activities Continue • Repurposing of North Reverb Baghouse Continues • Replacement of Blast Furnace Partial Enclosure Continues • Installation of Rotary Dryer Regenerative Thermal Oxidizer Continues • Blast Furnace Tray Type Wet Scrubbing System Installation Continues • Installation of Blast RTO Continues • RCRA RFI Soil Sampling Starts • Hard Lead System Ventilation Modification Continues • Blast Furnace Slag Tap Ventilation Hood Modification Continues • Reverb Furnace Feed Modification Continues • Reverb Feedroom/Corridor Floors continues • West Yard Sump Piping • Installation of High Speed Doors Completes • Building Negative Pressure Upgrade Completes • Repair to Reaction Tank Piping in Waste Water Treatment Continues • Acid Collection Sump #4 in Battery Storage Area Unit #3 Continues

Week	Anticipated Activities
Feb. 12 - Feb. 18	<ul style="list-style-type: none"> • Storm Water Repair 3 Manholes Completes • Repurposing of North Reverb Baghouse Continues • Replacement of Blast Furnace Partial Enclosure Continues • Installation of Rotary Dryer Regenerative Thermal Oxidizer Continues • Blast Furnace Tray Type Wet Scrubbing System Installation Continues • Installation of Blast RTO Continues • RCRA RFI Soil Sampling Continues • Hard Lead System Ventilation Modification Continues • Blast Furnace Slag Tap Ventilation Hood Modification Continues • Reverb Feed / Corridor Floors Continues • West Yard Sump Piping Continues • Installation of High Speed Doors Completes • Repair to Reaction Tank Piping in Waste Water Treatment Completes • Acid Collection Sump #4 in Battery Storage Area #3 Completes

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

- o Repair to Reaction Tank Piping in Waste Water Treatment – STARTED
- o Acid Collection Sump #4 in Battery Storage Area #3 - STARTED

POTENTIAL CHANGES AND ACTION ITEMS REQUIRING RESOLUTION:

The following items require resolution:

- o None at this time.

OTHER NOTES/COMMENTS

Due to budgetary constraints and Exide's schedule, continuous monitoring of all activities was not possible. Each activity being performed is inspected periodically on a daily basis, but is no longer continuously monitored.

SUMMARY:

The summary provided herein covers the activities for the period of January 29, 2015 through February 4, 2015. 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

Gant Chart Schedule

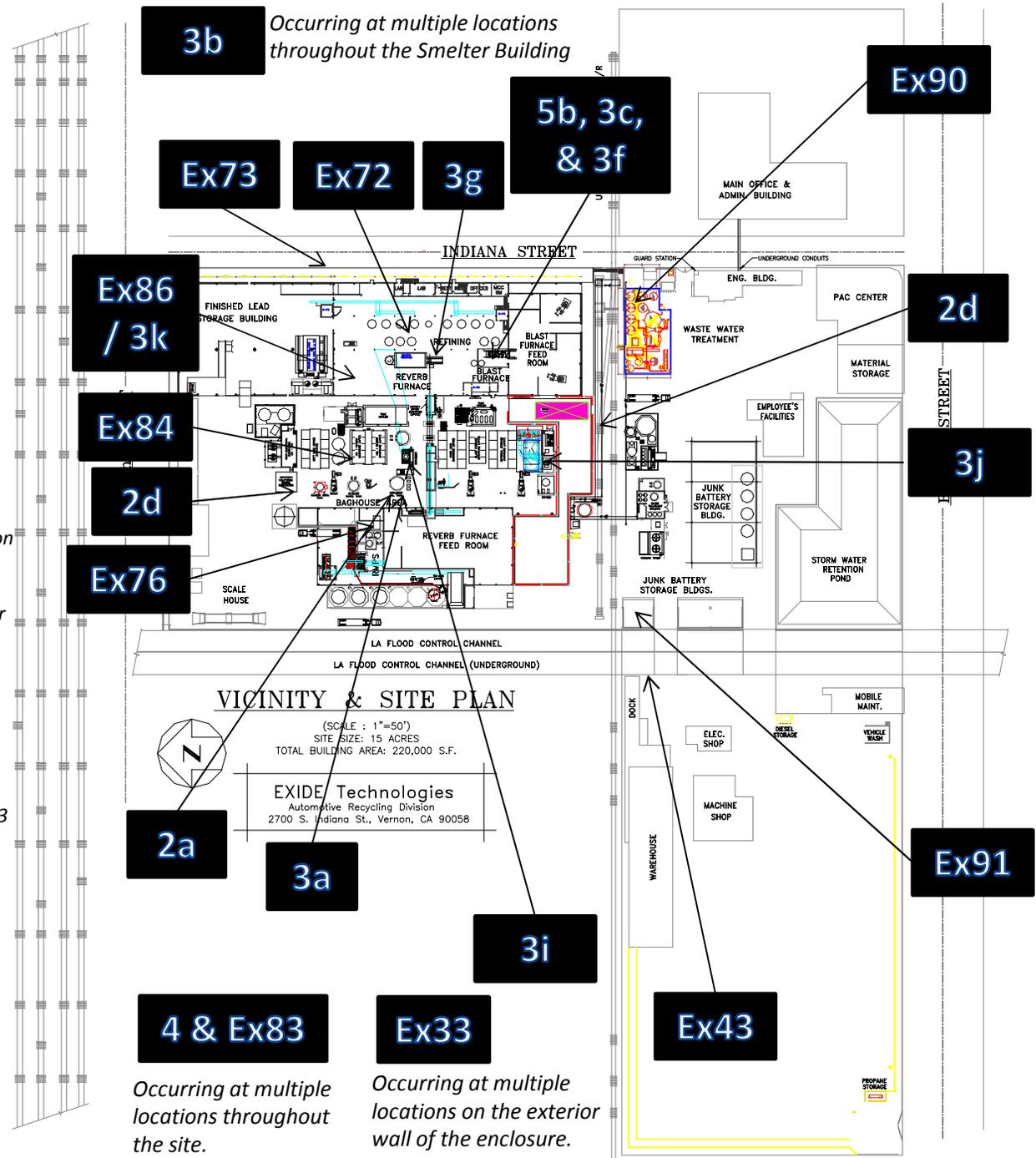
Site Map



Mitigation Project Map Layout
Week 1/29/15 – 2/18/15

Rev: 2/5/2015

- Ex43. West Yard Sump Piping*
- 2a. Dust Removal*
- Ex73. Stormwater Repair – 3 Manholes*
- Ex33. Building Negative Pressure Monitoring Upgrade*
- 4. RCRA RFI Soil Sampling*
- Ex83. RFI Soil Sampling Supplemental*
- Ex72. Cleaning of Assorted Materials in Total Enclosure*
- Ex76. Various Work Methods in Total Enclosure*
- 5b. Blast Furnace Activities*
- 3a. Blast Furnace Tray Type Wet Scrubbing System Installation*
- Ex84. Repurposing of North Reverb Baghouse*
- 3c. Replacement of Blast Furnace Partial Enclosure*
- 3i. Installation of Rotary Dryer Regenerative Thermal Oxidizer*
- 3j. Installation of HEPA Filters on MAC Baghouses*
- Ex86 / 3k. Installation of Blast RTO*
- 3b. Hard Lead System Ventilation Modification*
- 3g. Reverb Furnace Feed Modification*
- 3f. Blast Furnace Slag Tap Ventilation Hood Modification*
- 2d. Installation of High Speed Doors*
- Ex90. Repair to Reaction Tank Piping*
- Ex91. Acid Collection Sump #4 in Battery Storage Area Unit #3*



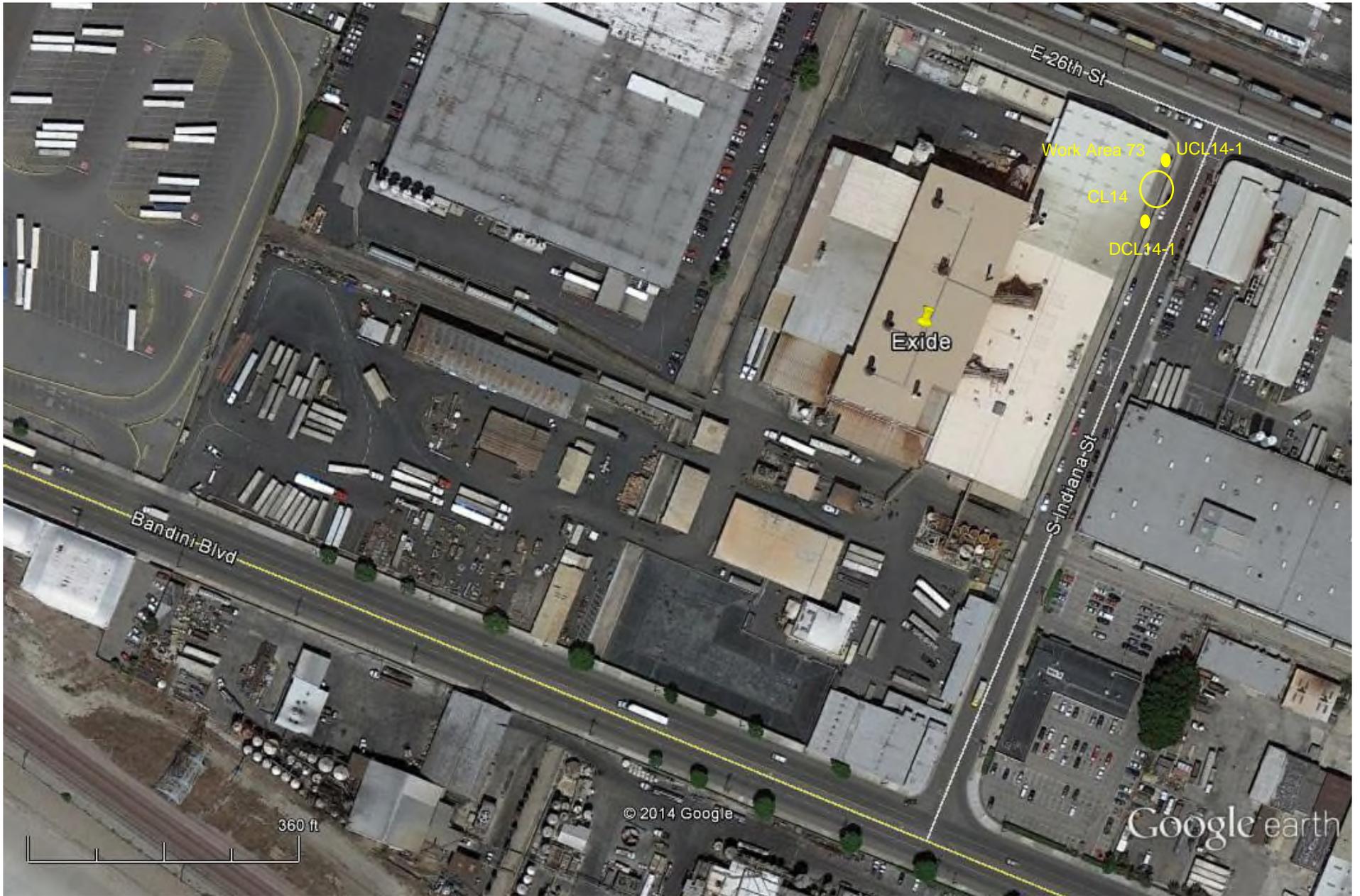
Numbering system correlates with Mitigation plan document. Ex refers to additional work part of Sec. 6b in the Mitigation plan document.
 Mitigation Schedule and Map_020515.pptx

Occurring at multiple locations throughout the site.

Occurring at multiple locations on the exterior wall of the enclosure.

Monitoring Results / Reports
(Tuesday, February 3, 2015)

ACTIVITY	SERIAL NUMBER	LOCATION
EX-73 – CL14: Storm Water Manhole Repair	8530142303	UPWIND
EX-73 – CL14: Storm Water Manhole Repair	8530113011	DOWNWIND



Exide Technologies
2700 Indiana Street
Vernon, CA 90058

2/3/2015 Work Area EX-73 - CL14

Test 055

Instrument		Data Properties	
Model	DustTrak II	Start Date	02/03/2015
Instrument S/N	8530142303	Start Time	10:19:17
		Stop Date	02/03/2015
		Stop Time	14:19:17
		Total Time	0:04:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	02/03/2015	10:34:17	0.146
2	02/03/2015	10:49:17	0.159
3	02/03/2015	11:04:17	0.161
4	02/03/2015	11:19:17	0.158
5	02/03/2015	11:34:17	0.155
6	02/03/2015	11:49:17	0.158
7	02/03/2015	12:04:17	0.156
8	02/03/2015	12:19:17	0.158
9	02/03/2015	12:34:17	0.167
10	02/03/2015	12:49:17	0.168
11	02/03/2015	13:04:17	0.169
12	02/03/2015	13:19:17	0.189
13	02/03/2015	13:34:17	0.207
14	02/03/2015	13:49:17	0.199
15	02/03/2015	14:04:17	0.181
16	02/03/2015	14:19:17	0.179

Test 064

Instrument		Data Properties	
Model	DustTrak II	Start Date	02/03/2015
Instrument S/N	8530113011	Start Time	12:45:10
		Stop Date	02/03/2015
		Stop Time	14:15:10
		Total Time	0:01:30:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	02/03/2015	13:00:10	0.164
2	02/03/2015	13:15:10	0.167
3	02/03/2015	13:30:10	0.195
4	02/03/2015	13:45:10	0.193
5	02/03/2015	14:00:10	0.183
6	02/03/2015	14:15:10	0.179