

February 20, 2015

CN: 15279

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

SOUTH COAST AQMD
 CLERK OF THE BOARD'S
 '15 FEB 20 P12:30

**PROJECT: EXIDE TECHNOLOGIES FACILITY ID NO. 124868,
 ORDER OF ABATEMENT CASE NO. 3151-32**
RE: WEEKLY STATUS REPORT # 23 (2/12/15 – 2/18/15)

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 February 12, 2015 through February 18, 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
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*

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 91	Acid Collection Sump #4 in Battery Storage Area Unit #3	Temporary Enclosure Under Negative Pressure
EX83 / 4	RCRA RFI Soil Sampling	Temporary Enclosure Under Negative Pressure*

* Dust Trak monitoring performed for this work item.

Dust Removal

National Response Corporation (NRC) did not perform any dust removal activities during this reporting period. NRC is on call and is scheduled to resume dust removal activities on an as needed basis.

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.

Blast Furnace Activities and Replacement of Blast Furnace Partial Enclosure

Advanced Construction resumed work in the Blast Furnace Partial Enclosure on Friday, February 13, 2015, and continued installing the sheeting for the new Blast Furnace Partial Enclosure after Exide personnel completed additional dust removal on the third level.

Tetra Tech personnel were onsite to observe the dust removal, 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

Advanced Construction and Exide personnel continued duct work for the new tray type Wet Scrubbing System. The primary scope of work includes removing large sections of ducting, lowering them to the floor of the total enclosure building in the bag house area and cutting the ducting into pieces for offsite recycling. Work will continue in the upcoming reporting period.

Tetra Tech personnel were onsite to observe the duct work. 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 mitigation plan

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, February 12, 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 Friday, February 13, 2015, and Wednesday, February 18, 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, February 12, 2015, for the repurposing of the North Reverb Bag House. National Coating's coating 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 Furnace RTO

Advanced Construction continued installation activities on Thursday, February 12, 2015, for the installation of the new RTO for the Blast Furnace. Activities included installation of electrical and gas utilities and the setting of the new RTO components. Equipment installation 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.

Reverb Feed Room/Corridor Floors

Advanced Construction continued maintenance of the reverb feed stockpiles.

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 February 12, 2015. Activities included 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.

Acid Collection Sump #4 in Battery Storage Area #3

Brownco Completed repair activities on Acid Collection Sump #4 on Thursday, February 12, 2015, within a temporary enclosure and Castlerock removed the temporary enclosure.

Verification activities included:

- Periodic visual inspection of the removal of the temporary enclosure.

RCRA RFI Soil Sampling

Advanced Geo began the RCRA RFI Soil Sampling on Wednesday, February 18, 2015. Castlerock constructed a temporary enclosure maintained under negative pressure and vented to a permitted HEPA filtration system. Activities included coring through the asphalt and advancing a hand auger to a depth of 5 feet to verify utility clearance at the first soil sampling location. Soil and asphalt cuttings were placed into 55-gallon drums within the temporary enclosure. RCRA RFI Soil Sampling will continue into the next reporting period.

Verification activities included:

- Upwind and Downwind Dust Trak monitoring on the temporary enclosure when sampling activities were conducted within the enclosure, 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.

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 did not detect excessive dust being generated from repair activities.

Activity Which Resulted in Excessive Dust	Additional Suppression Activity
None	None

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
Replacement of Blast Furnace Partial Enclosure	Ongoing
Blast Furnace Activities	Ongoing
Blast Furnace Tray Type Wet Scrubbing System Installation	Ongoing
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
Acid Collection Sump #4 in Battery Storage Area #3	Completed
RCRA RFI Soil Sampling	Started

WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
Feb. 19 – Feb. 25	<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 Continues • 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 • Building Negative Pressure Upgrade Continues • Removal and Shipment of Reverb Feed Starts

Week	Anticipated Activities
Feb. 26 - Mar. 4	<ul style="list-style-type: none"> • Repurposing of North Reverb Baghouse Continues • Replacement of Blast Furnace Partial Enclosure Completes • Installation of Rotary Dryer Regenerative Thermal Oxidizer Completes • 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 Completes • Reverb Feed / Corridor Floors Continues • West Yard Sump Piping Continues • Building Negative Pressure Upgrade Completes • Removal and Shipment of Reverb Feed Continues

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

- o Acid Collection Sump #4 in Battery Storage Area #3 – COMPLETED
- o RCRA RFI Soil Sampling – 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 February 12, 2015 through February 18, 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
Field Monitoring Data

Gant Chart Schedule

Site Map

Mitigation Project Map Layout

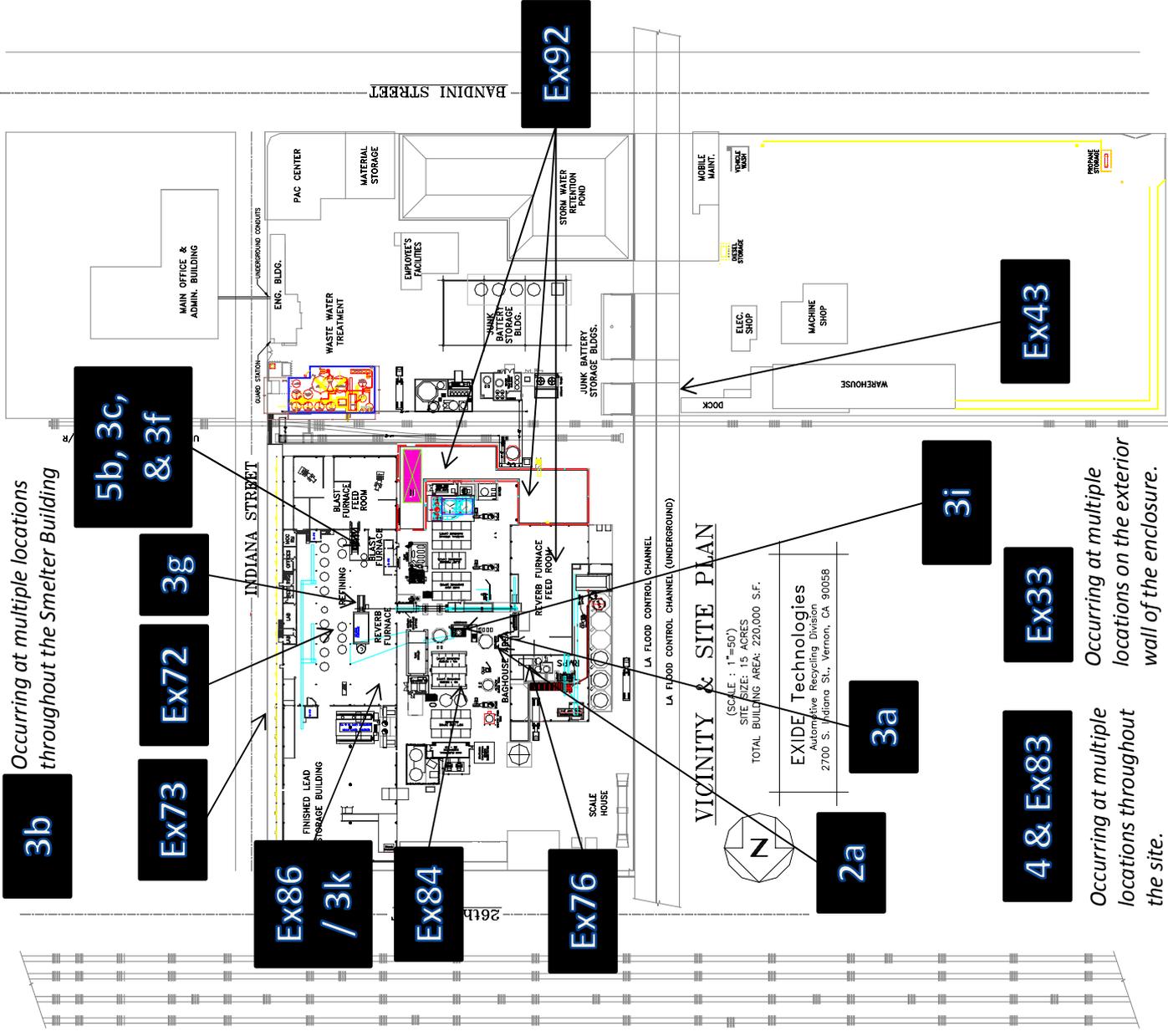
Week 2/12/15 – 3/4/15

Rev: 2/19/2015

- Ex43. West Yard Dump 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
- 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
- Ex92. Removal & Shipment of Reverb Feed

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_021915.pptx



Monitoring Results / Reports
(Friday, February 13, 2015)

ACTIVITY	SERIAL NUMBER	LOCATION
EX-73 CL14 Manhole Repair	8530141712	UPWIND
EX-73 CL14 Manhole Repair	8533132902	DOWNWIND

Monitoring Results / Reports
(Wednesday, February 18, 2015)

ACTIVITY	SERIAL NUMBER	LOCATION
EX-73 CL14 Manhole Repair	8530113011	UPWIND
EX-73 CL14 Manhole Repair	8530110315	DOWNWIND
EX-83 RCRA RFI Soil Sampling	8533132902	UPWIND
EX-83 RCRA RFI Soil Sampling	8530142303	DOWNWIND