

September 18, 2015

'15 SEP 18 P2:20

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 # 53 (9/10/15 – 9/16/15)

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 September 10, 2015 through September 16, 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) 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)
2a	Dust Removal	Total Enclosure Building Under Negative Pressure
EX83/4	RCRA RFI Soil Sampling	Temporary Enclosure Under Negative Pressure*
EX 94	2 nd Round Feed Room Soil Sampling	Total Enclosure Building Under Negative Pressure

* Dust Trak monitoring performed for this work item.

Dust Removal

National Response Corporation (NRC) resumed decontamination of the vacuum truck on Thursday, September 10, 2015, in the Finished Lead Warehouse. NRC decontaminated the outside of vacuum truck (Vehicle License No. 7M95594) which has a valid SCAQMD Various Locations Permit for lead abatement (Permit No. G33129 A/N 568775) in the Finished Lead Warehouse. On Friday September 11, 2015, the vacuum truck was moved to the Santa Maria area where the vacuum truck was emptied and the

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inside of the vacuum truck was decontaminated. Decontamination of the vacuum truck was completed on Tuesday, September 15, 2015 and NRC demobilized it from the site.

Tetra Tech personnel were onsite to observe work performed by NRC in the Total Enclosure Building. Verification activities included:

- Visual observation of the decontamination of the vacuum truck within the Total Enclosure Building.
- Verification that the Total Enclosure Building was maintained under negative pressure and vented to operational air pollution control equipment during all decontamination activities.
- Verification that the SCAQMD Various Locations Permit was present for the vacuum truck HEPA vacuum and that filters were certified with a minimum efficiency of 99.97% for capture of 0.3 micron particles.

RCRA RFI Soil Sampling

Advanced Geoscience and their subcontractors Cascade Drilling and Avocet continued RCRA RFI Soil Sampling at an offsite location on Indiana Street near the Indiana Street entrance gate. Typically offsite locations do not require oversight by Tetra Tech Inc. However, the drilling location on Indiana Street is upwind of the North East high volume fence line monitoring point. Tetra Tech observed the activities on Indiana Street from within the Exide facility including the placement of a Dust Trak monitor on the Exide property, immediately downwind of the drilling activity to monitor for fugitive dust. Activities at the offsite location included coring through the asphalt, advancing a hand auger to a depth of 5 feet to verify utility clearance, advancing the borehole to depths greater than 5 feet using a Rotosonic drill rig, collection of soil samples, and installation of a groundwater monitoring well. Activities at the offsite location on Indiana Street as observed from the Exide facility appeared to follow the SCAQMD approved mitigation plan. RCRA RFI Soil Sampling will continue into the next reporting period at off-site locations.

Verification activities included:

- Visual observation of the RCRA RFI Soil Sampling for fugitive dust at the offsite borehole location.
- Review of data collected downwind of the offsite borehole location using the Dust Trak monitoring did not detect any discernible increases in fugitive dust related to the RCRA RFI soil sampling activities.

Soil Sampling – 2nd Round Feed Room Enclosure

Advanced Geoscience and their subcontractors Cascade Drilling, Advanced Construction, and Avocet resumed the second round of soil sampling in the feed room enclosure on Thursday, September 10, 2015. Advanced Construction continued saw cutting and coring through the concrete floor at locations marked for trenches and borings respectively. Cascade completed all soil borings by Saturday, September 12, 2015, and the drill rig was decontaminated and demobilized from the site. The second

round of soil sampling beneath the feed room floor will continue with the trenching activities into the next reporting period.

Verification activities included:

- Visual observation of the second round of Feed Room floor soil sampling for fugitive dust within the Total Enclosure Building.
- Verification that the Total Enclosure Building was maintained under negative pressure and vented to operational air pollution control equipment during all feed room floor soil sampling activities.
- Visual observation of the decontamination of the drill rig prior to demobilization from the Total Enclosure Building.

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
Dust Removal	Completed
RCRA RFI Soil Sampling	Ongoing
2 nd Round Feed Room Soil Sampling	Ongoing

WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
Sept. 17 – Sept. 23	<ul style="list-style-type: none"> • RCRA RFI Soil Sampling Continues • 2nd Round of Feed Room Floor Sampling Continues

Week	Anticipated Activities
Sept. 24 - Sept. 30	<ul style="list-style-type: none"> • RCRA RFI Soil Sampling Continues • 2nd Round of Feed Room Floor Sampling Continues

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

- o Dust Removal - COMPLETE

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 September 10, 2015 through September 16, 2015. Please note that the work that occurred on Saturday, September 12, 2015, related to the second round of Feed Room floor sampling was observed by Tetra Tech. 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

Project Schedule

Week of 9/7/15 – 9/30/15

Rev: 9/17/2015

		Recycling Division, Vernon, CA					9/5/2015							9/12/15							9/19/15							9/26/15								
							07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30						
Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%																														
2a	Dust Removal for Structure	Total Enclosure	351 days	9/29/14	9/15/15	100%																														
Ex72	Cleaning of Assorted Materials in Total Enclosure	Total Enclosure	406 days	1/20/14	12/31/15	80%																														
Ex76	Various Work Methods in Total Enclosure	Total Enclosure	405 days	1/21/14	12/31/15	80%																														
4	RCRA RFI Soil Sampling	General	209 days	2/18/15	9/15/2015	100%																														
Ex83	RFI Soil Sampling Supplemental	General	209 days	2/18/15	9/15/2015	100%																														
Ex94	2nd Round Feed Room Soil Sampling	General	214 days	3/9/15	10/9/15	90%																														

*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 9/7/15 – 9/30/15

Rev: 9/17/15

2a. Dust Removal

4. RCRA RFI Soil Sampling

Ex 83. RFI Soil Sampling Supplemental

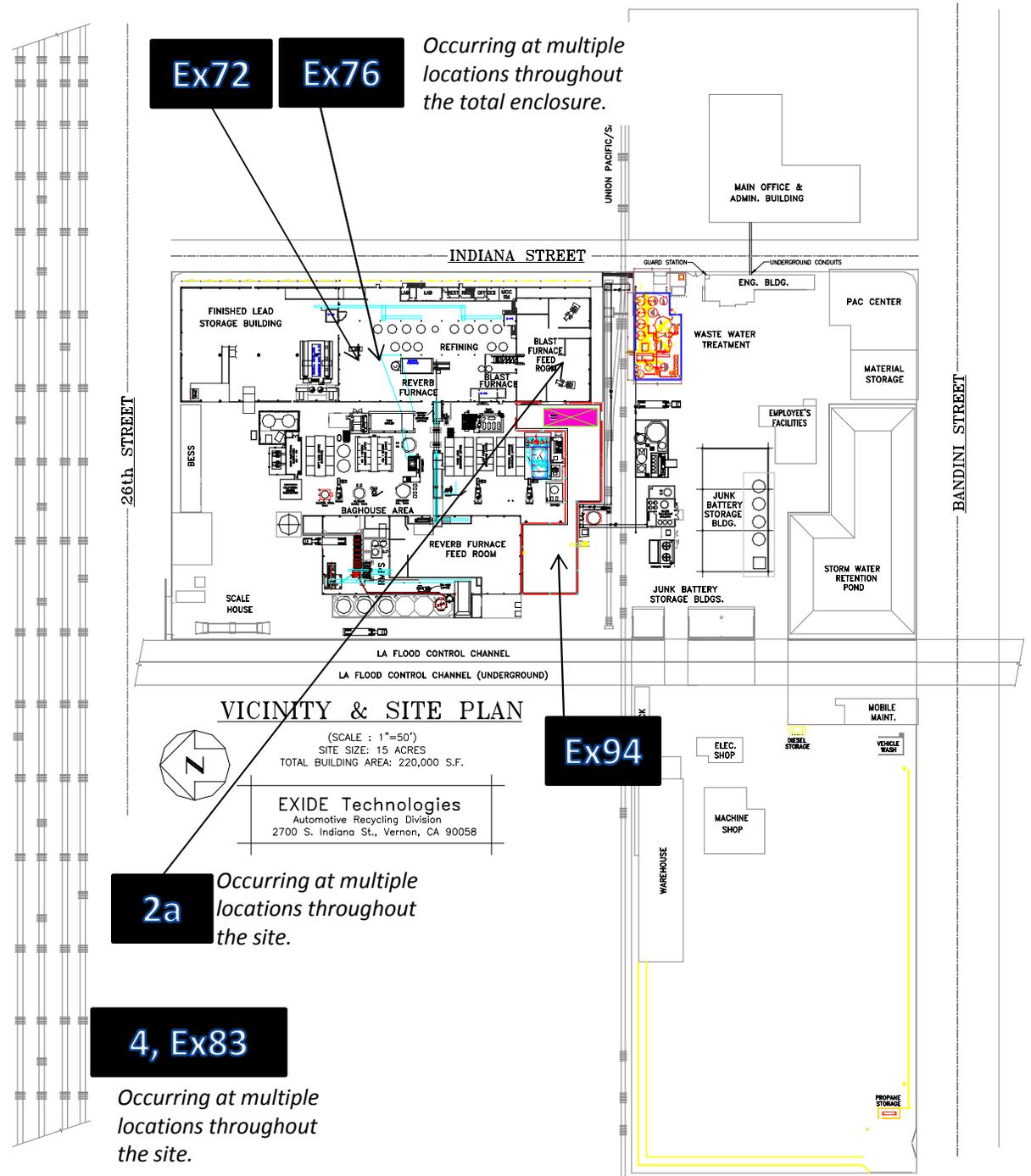
Ex 72. Cleaning of Assorted Materials in Total Enclosure

Ex 76. Various Work Methods in Total Enclosure

Ex 94. 2nd Round Feed Room Soil Sampling.

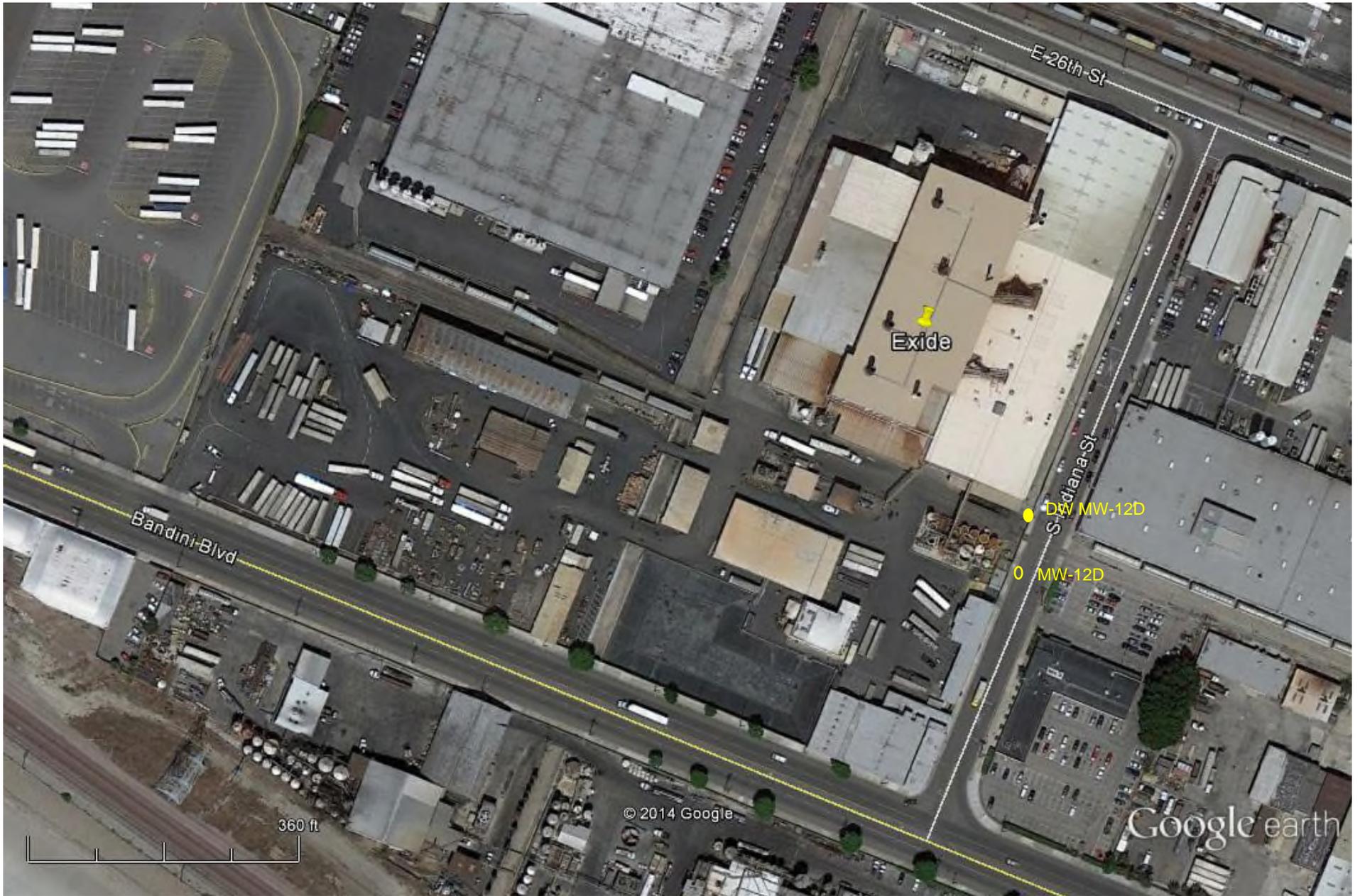
Numbering system correlates with Mitigation plan document. Ex refers to additional work part of Sec. 6b in the Mitigation plan document.

Mitigation Schedule and Map_091715.pptx



Monitoring Results / Reports
(Thursday, September 10, 2015)

ACTIVITY	SERIAL NUMBER	LOCATION
EX83/4 RCRA RFI Soil Sampling (MW-12D)	8530151809	Downwind



Exide Technologies
2700 Indiana Street
Vernon, CA 90058

9/10/2015 Work Area EX-83/4

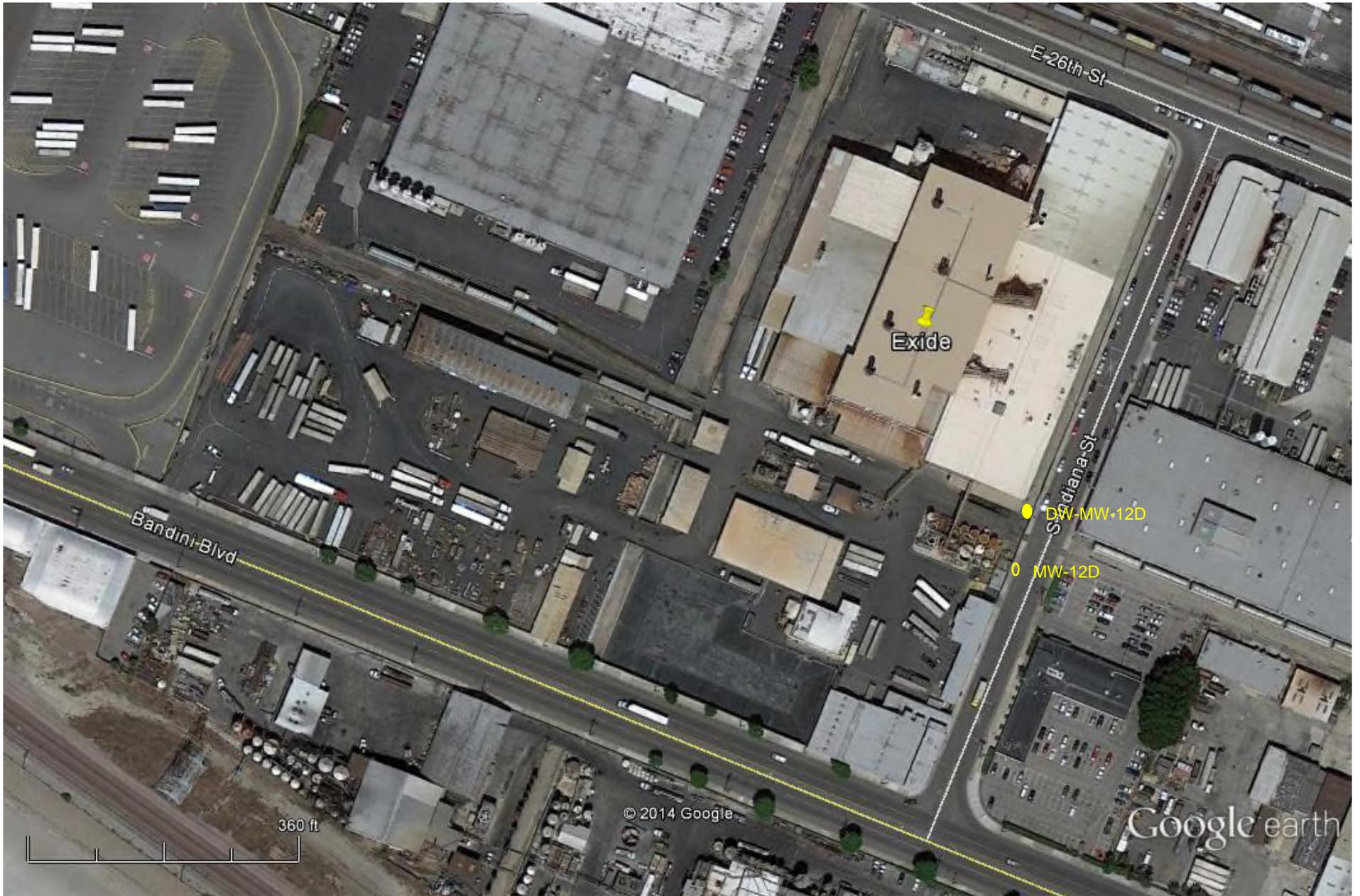
Test 052

Instrument		Data Properties	
Model	DustTrak II	Start Date	09/10/2015
Instrument S/N	8530151809	Start Time	14:19:26
		Stop Date	09/10/2015
		Stop Time	15:19:26
		Total Time	0:01:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	09/10/2015	14:34:26	0.034
2	09/10/2015	14:49:26	0.031
3	09/10/2015	15:04:26	0.032
4	09/10/2015	15:19:26	0.032

Monitoring Results / Reports
(Friday, September 11, 2015)

ACTIVITY	SERIAL NUMBER	LOCATION
EX83/4 RCRA RFI Soil Sampling (MW-12D)	8530151905	Downwind



Exide Technologies
2700 Indiana Street
Vernon, CA 90058

9/11/2015 Work Area EX- 83/4

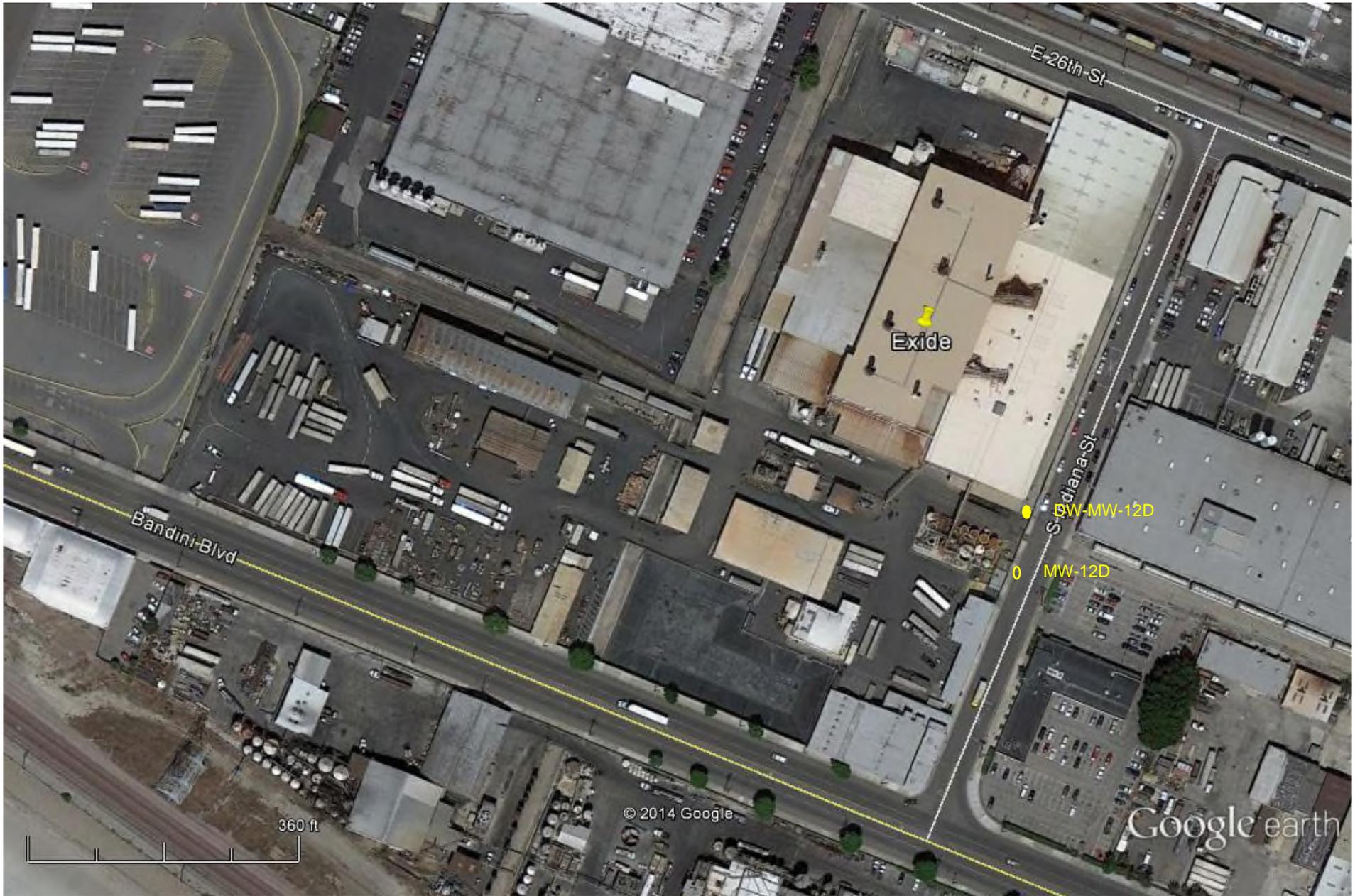
Test 054

Instrument		Data Properties	
Model	DustTrak II	Start Date	09/11/2015
Instrument S/N	8530151905	Start Time	07:20:43
		Stop Date	09/11/2015
		Stop Time	15:20:43
		Total Time	0:08:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	09/11/2015	07:35:43	0.036
2	09/11/2015	07:50:43	0.036
3	09/11/2015	08:05:43	0.038
4	09/11/2015	08:20:43	0.039
5	09/11/2015	08:35:43	0.039
6	09/11/2015	08:50:43	0.035
7	09/11/2015	09:05:43	0.033
8	09/11/2015	09:20:43	0.035
9	09/11/2015	09:35:43	0.036
10	09/11/2015	09:50:43	0.033
11	09/11/2015	10:05:43	0.027
12	09/11/2015	10:20:43	0.031
13	09/11/2015	10:35:43	0.029
14	09/11/2015	10:50:43	0.027
15	09/11/2015	11:05:43	0.028
16	09/11/2015	11:20:43	0.028
17	09/11/2015	11:35:43	0.026
18	09/11/2015	11:50:43	0.027
19	09/11/2015	12:05:43	0.025
20	09/11/2015	12:20:43	0.025
21	09/11/2015	12:35:43	0.024
22	09/11/2015	12:50:43	0.024
23	09/11/2015	13:05:43	0.026
24	09/11/2015	13:20:43	0.027
25	09/11/2015	13:35:43	0.028
26	09/11/2015	13:50:43	0.027
27	09/11/2015	14:05:43	0.028
28	09/11/2015	14:20:43	0.026
29	09/11/2015	14:35:43	0.023
30	09/11/2015	14:50:43	0.022
31	09/11/2015	15:05:43	0.020
32	09/11/2015	15:20:43	0.019

Monitoring Results / Reports
(Monday, September 14, 2015)

ACTIVITY	SERIAL NUMBER	LOCATION
EX83/4 RCRA RFI Soil Sampling (MW-12D)	8530151809	Downwind



Exide Technologies
2700 Indiana Street
Vernon, CA 90058

9/14/2015 Work Area EX-83/4

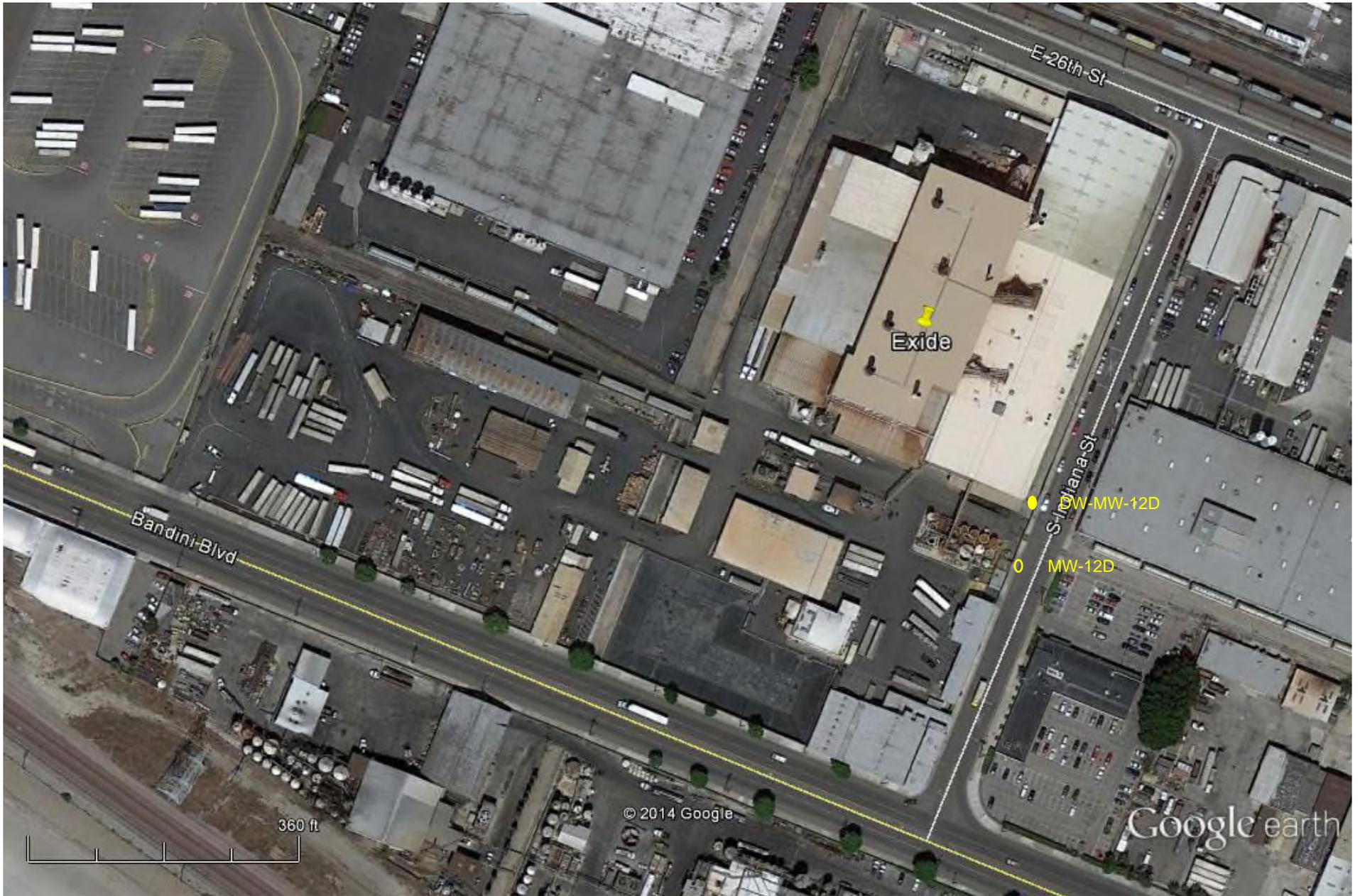
Test 053

Instrument		Data Properties	
Model	DustTrak II	Start Date	09/14/2015
Instrument S/N	8530151809	Start Time	08:20:19
		Stop Date	09/14/2015
		Stop Time	15:20:19
		Total Time	0:07:00:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	09/14/2015	08:35:19	0.032
2	09/14/2015	08:50:19	0.037
3	09/14/2015	09:05:19	0.035
4	09/14/2015	09:20:19	0.031
5	09/14/2015	09:35:19	0.028
6	09/14/2015	09:50:19	0.027
7	09/14/2015	10:05:19	0.028
8	09/14/2015	10:20:19	0.025
9	09/14/2015	10:35:19	0.024
10	09/14/2015	10:50:19	0.026
11	09/14/2015	11:05:19	0.025
12	09/14/2015	11:20:19	0.023
13	09/14/2015	11:35:19	0.024
14	09/14/2015	11:50:19	0.022
15	09/14/2015	12:05:19	0.022
16	09/14/2015	12:20:19	0.020
17	09/14/2015	12:35:19	0.019
18	09/14/2015	12:50:19	0.020
19	09/14/2015	13:05:19	0.023
20	09/14/2015	13:20:19	0.024
21	09/14/2015	13:35:19	0.028
22	09/14/2015	13:50:19	0.029
23	09/14/2015	14:05:19	0.032
24	09/14/2015	14:20:19	0.031
25	09/14/2015	14:35:19	0.026
26	09/14/2015	14:50:19	0.017
27	09/14/2015	15:05:19	0.014
28	09/14/2015	15:20:19	0.012

Results / Reports
(Wednesday, September 16, 2015)

ACTIVITY	SERIAL NUMBER	LOCATION
EX83/4 RCRA RFI Soil Sampling (MW-12D)	8530151809	Downwind



Exide Technologies
2700 Indiana Street
Vernon, CA 90058

9/16/2015 Work Area EX-83/4

Test 054

Instrument		Data Properties	
Model	DustTrak II	Start Date	09/16/2015
Instrument S/N	8530151809	Start Time	09:14:24
		Stop Date	09/16/2015
		Stop Time	14:29:24
		Total Time	0:05:15:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	09/16/2015	09:29:24	0.015
2	09/16/2015	09:44:24	0.011
3	09/16/2015	09:59:24	0.013
4	09/16/2015	10:14:24	0.013
5	09/16/2015	10:29:24	0.012
6	09/16/2015	10:44:24	0.010
7	09/16/2015	10:59:24	0.010
8	09/16/2015	11:14:24	0.010
9	09/16/2015	11:29:24	0.012
10	09/16/2015	11:44:24	0.011
11	09/16/2015	11:59:24	0.013
12	09/16/2015	12:14:24	0.010
13	09/16/2015	12:29:24	0.014
14	09/16/2015	12:44:24	0.015
15	09/16/2015	12:59:24	0.014
16	09/16/2015	13:14:24	0.014
17	09/16/2015	13:29:24	0.014
18	09/16/2015	13:44:24	0.014
19	09/16/2015	13:59:24	0.013
20	09/16/2015	14:14:24	0.013
21	09/16/2015	14:29:24	0.013