



UPDATE ON SOUTH COAST AQMD'S ACTIVITIES RELATED TO EXIDE TECHNOLOGIES

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Senator Kevin de León Town Hall Meeting

October 8, 2013 , Los Angeles, CA

SCAQMD



- ❑ Our agency, the South Coast Air Quality Management District (SCAQMD), manages air pollution for all of Orange County and the urban portions of Los Angeles, Riverside and San Bernardino counties
- ❑ This area is 10,743 square miles and is home to about 40% of the population of California

Air Quality Issues of Primary Concern

Lead -- Cancer (US EPA classification: B2-probable human carcinogen)

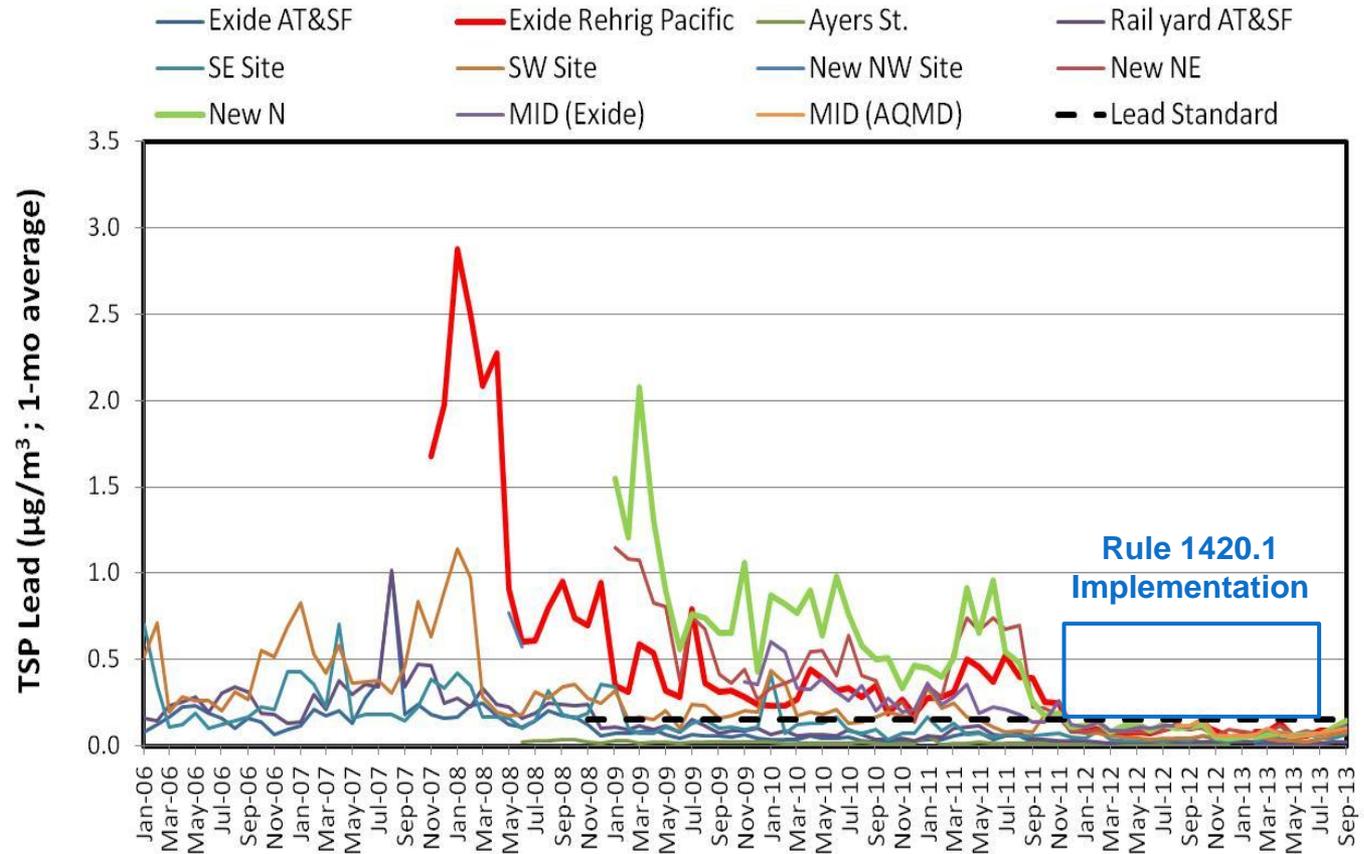
Non-cancer Chronic Risks (low concentration, long exposure)	Non-Cancer Acute Risks (high concentration, short exposure)
Developmental, Nervous, Immune, Kidney, Blood, and Reproductive Systems	Gastrointestinal, Respiratory, Skin, and Eye Systems

Arsenic -- Cancer (US EPA classification: A - human carcinogen)
Lung, liver, kidney, bladder, and skin

Non-cancer Chronic Risks (low concentration, long exposure)	Non-Cancer Acute Risks (high concentration, short exposure)
Developmental, Cardiovascular, Nervous, Respiratory, and Skin Systems	Developmental, Cardiovascular, and Nervous Systems

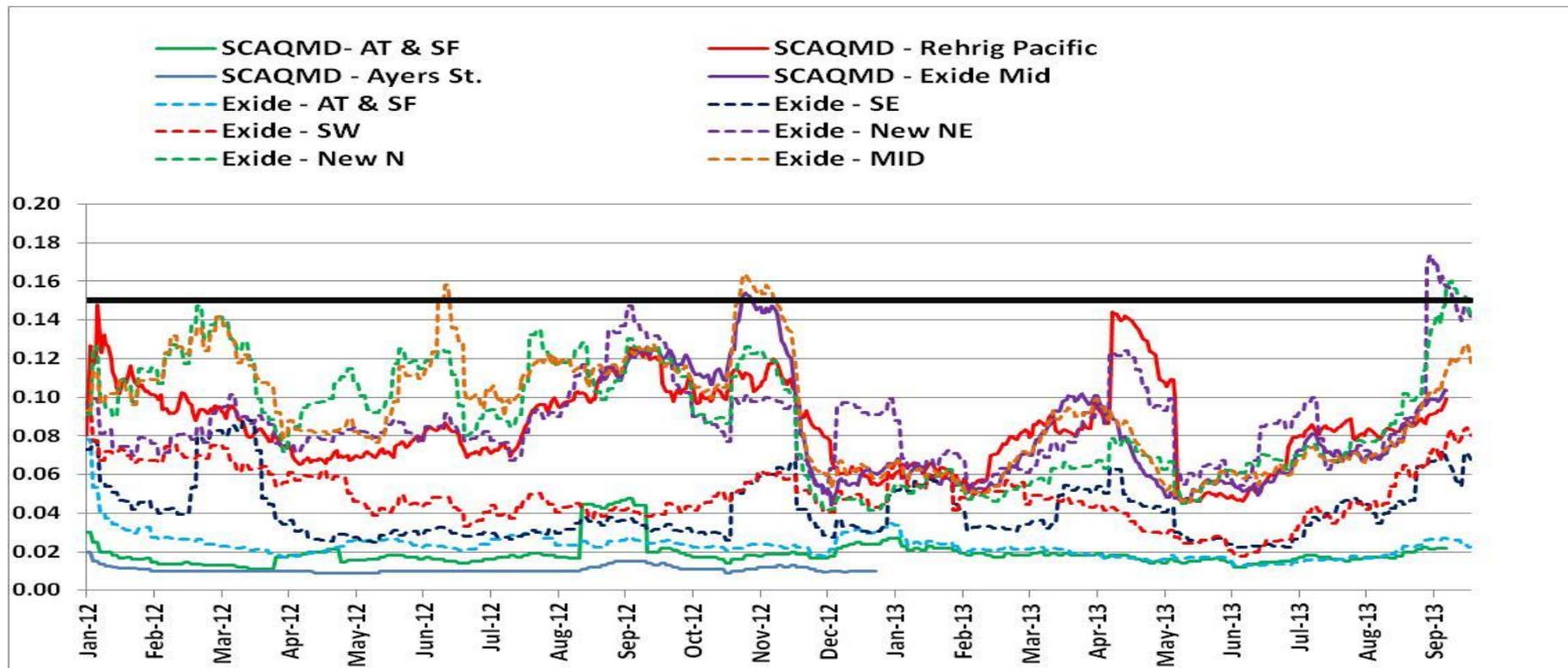
Ambient Lead Monitoring Near Exide

- Rule 1420.1 adopted November 2010
- Substantial lead reductions after full implementation of Rule 1420.1



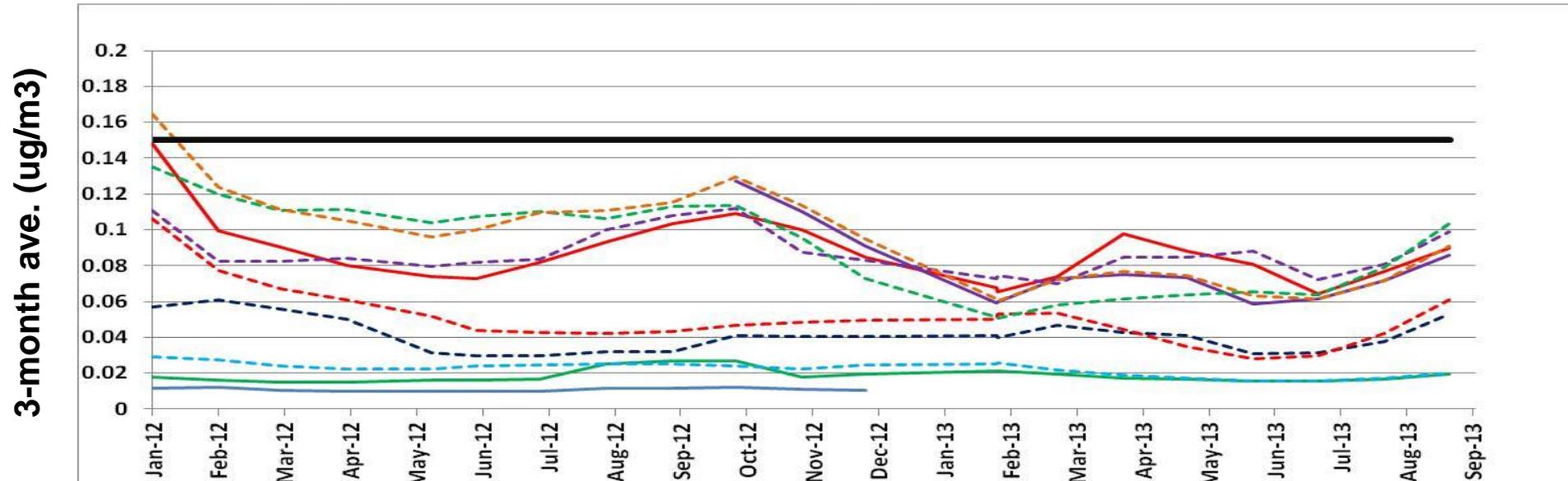
SCAQMD Rule 1420.1 Ambient Lead Limit

- Stricter than Federal health-based standard
- Additional safeguard – more health protective
- Designed to avoid violations of Federal standard

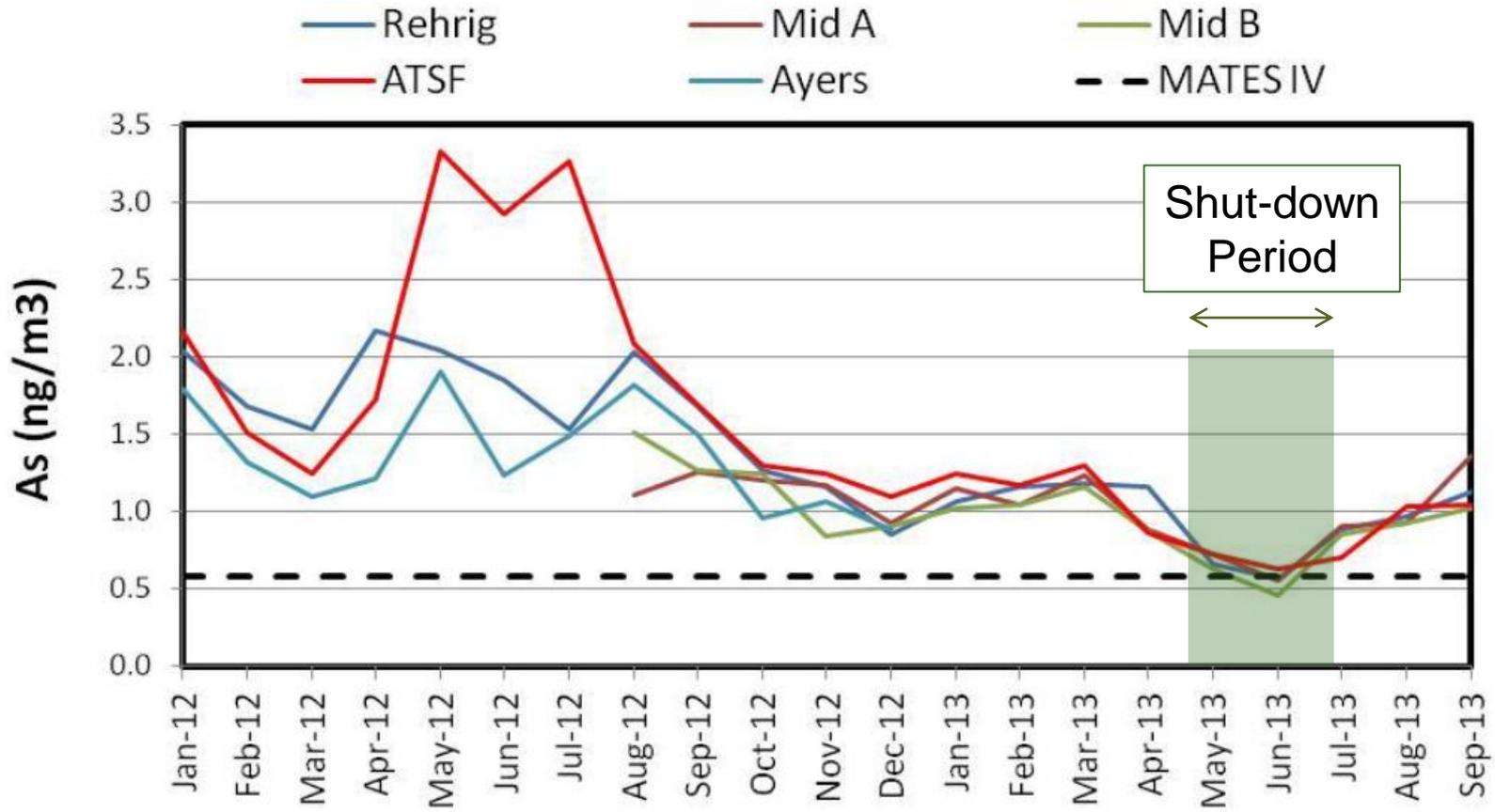


Federal Lead Standard

- No violations since January 2012
- SCAQMD Rule 1420.1 limit successful in avoiding Federal violations



Ambient Arsenic Monitoring Near Exide



General Concerns

- Ability to maintain source tested levels
 - ▣ Facility operations
 - ▣ Adequacy of existing pollution control equipment
 - ▣ Need for additional engineering
- History
 - ▣ Violations
 - ▣ Breakdowns

Compliance History - 2013

Year	# Inspections	# NOVs	Reasons
2013	83	4	Exceeded lead levels twice; Control device not fully operational; Failure to notify public

- Additional NOVs in process
 - Blast furnace emissions not properly vented to control equipment; equipment not maintained to ensure proper operation
 - Lead-containing soil not properly stored; not operating mobile sweeper at least once per shift

Recent Issues at Exide

- Source testing delayed due to DTSC shutdown and various operational problems
- Breakdowns (2013)
 - July 7 - West MAC baghouse damage, excessive heat
 - July 23 - multiple equipment shutdown, approaching CO limit
 - July 29 - blower motor for dust collector
 - August 25 - blower motor for MAC baghouse
 - August 30 - blast furnace, due to water leak
 - Plus numerous other events
- Exceeded ambient lead level
 - September 9 - 15 % curtailment required
 - September 18 - additional curtailment required

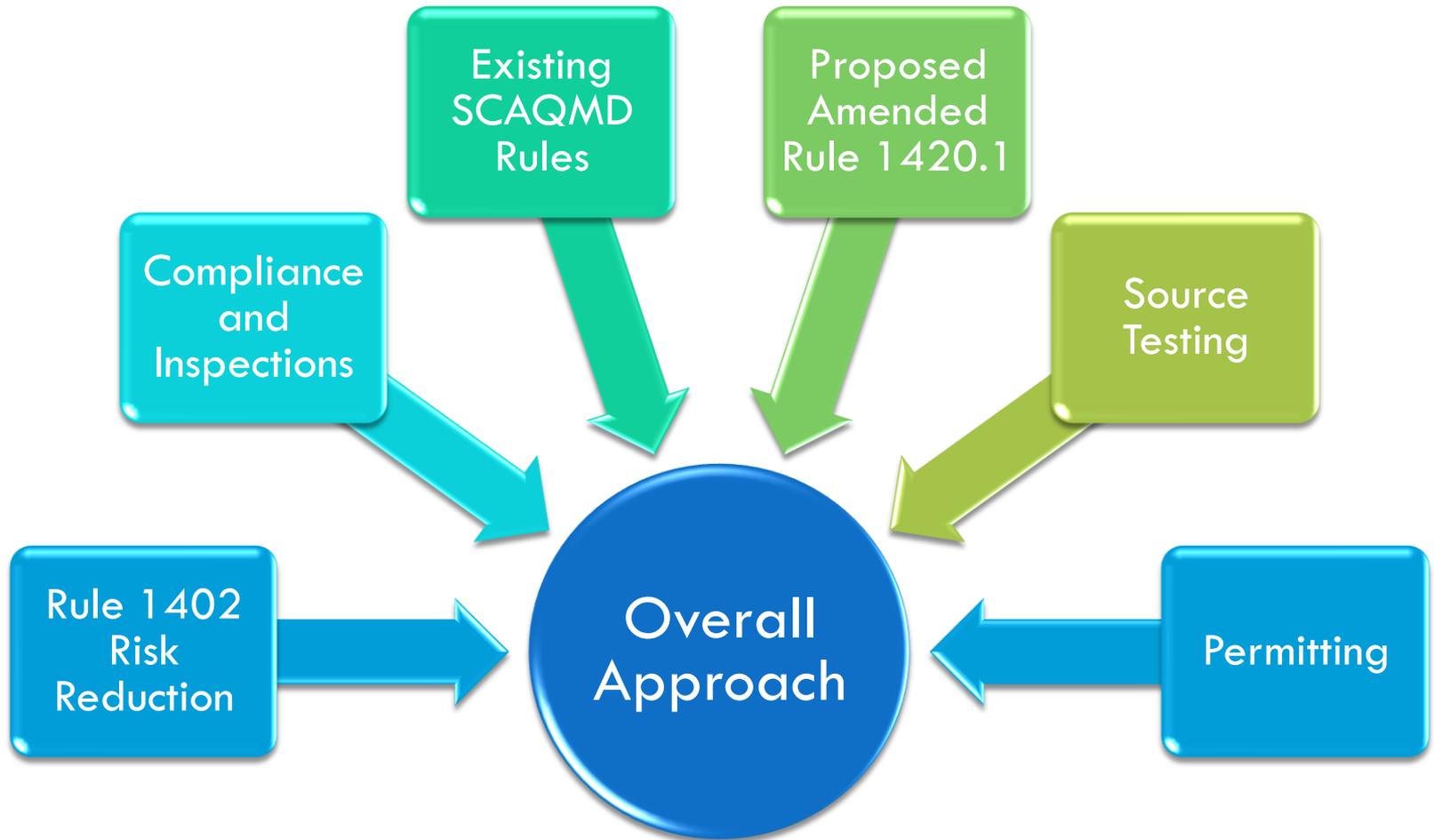
Concerns Regarding Rule 1402 Risk Reduction Plan

- Submitted August 28, 2013
- Currently evaluating - Initial concerns
 - Risk Reduction Plan is based on source tests with lower production levels, operations variable
 - Need to ensure that the isolation door can operate consistently
 - Some control systems may be undersized or not appropriate for gases

Air Pollution Controls in DTSC Agreement

Controls/Strategy	In Risk Reduction Plan submitted to SCAQMD?	Comments
HEPA for material handling baghouse	YES	Risk Reduction Plan - 3 weeks sooner
HEPA for MAC baghouse	YES	
HEPA for soft lead baghouse	YES	
HEPA for hard lead baghouse	YES	
RMPS HEPA modification	YES	
Regenerative Thermal Oxidizer for rotary dryer	NO, but previously submitted under Rule 1420.1 Plan	
Risk Reduction Targets	YES	Risk Reduction Plan more stringent

SCAQMD Approach Regarding Exide



Proposed Amendments to SCAQMD Rule 1420.1

- Facility emission limit representing best available control technologies:
 - Arsenic (98% reduction)
 - Benzene (95% reduction)
 - 1,3-butadiene (99% reduction)
- Arsenic ambient air quality requirement - automatic curtailment if exceeded
- Requires proper venting of emissions to appropriate control devices and continuous pressure gauges to monitor compliance
- Additional source testing requirements
- Scheduled for consideration December 6, 2013

Next Steps

- Complete review of source tests and risk reduction plan (end of October 2013)
- Continue ambient monitoring for lead and arsenic (on-going)
- Continue compliance and enforcement
 - Prosecution of violations
 - Consider Order for Abatement
- Proceed with Proposed Amended Rule 1420.1 (December 2013)
- Community meetings (November 2013)