

SOUTH COAST AOMD CLERK OF THE BOARDS

January 30, 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 # 20 (1/22/15 – 1/28/15)

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 22, 2015 through January 28, 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				
5d	Santa Maria Tank	Total Enclosure Building Under Negative Pressure				
3с	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				

Tetra Tech BAS, Inc.

TASK ID	Major Work Item	Mitigation Measure(s)				
EX 73	Stormwater Repair – 3 Manholes	Temporary Enclosure Under Negative Pressure				
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				
EX 87	#5 Sand Filter Tank in the Waste Water Treatment	Temporary Enclosure Under Negative Pressure				
3b	Hard Lead System Ventilation Modification	Total Enclosure Building Under Negative Pressure				
Зf	Blast Furnace Slag Tap Ventilation Hood Modification	Total Enclosure Building 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 began installation of the high speed door in the southern portion of the baghouse building on January 26, 2015. This work will continue in an upcoming 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

Santa Maria Tank #12

Bear Welding resumed work on the construction of the Santa Maria tank #12. Construction activities included welding, cutting, and grinding within the tank.

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.

Blast Furnace Activities and Replacement of Blast Furnace Partial Enclosure

Advanced Construction resumed work in the Blast Furnace Partial Enclosure on Thursday, January 22, 2015, and continued installing the frame 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

Advanced Construction continued modification activities on Thursday, January 22, 2015, by removing and dismantling the Ram Furnace Feed System. Reverb Furnace Feed modifications 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.

Installation of the Rotary Dryer Regenerative Thermal Oxidizer (RTO)

Advanced Construction and Baghouse Services continued installation activities on Saturday, January 23, 2015, for the Rotary Dryer RTO. The blower motor assembly for the new RTO was installed on Wednesday, January 27, 2015.

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

No work was completed on this project during this reporting period. Innovative Construction Solutions (ICS) has been requested to provide additional information on a proposed repair method before the method can be approved. Repair activities will resume once a repair method is approved.

Repurposing of North Reverb Bag House

Exide personnel resumed activities on Friday, January 23, 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 22, 2015, for the installation of the new RTO for the Blast Furnace. Activities included installation of rebar and framing for the foundation 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 began preparation of the Reverb Feedroom and corridor floors on Thursday, January 22, 2015. Feed from the southern portion of the Reverb Feedroom was stockpiled onto a geomembrane liner in the northern area. The stockpiling of feed 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 22, 2015, and is currently installing programming and wireless communication.

<u>#5 Sand Filter Tank in the Waste Water Treatment</u>

Exide completed all test and repairs on the #5 Sand Filter Tank in the Water Treatment area on Friday, January 23, 2015.

Tetra Tech personnel were onsite but did not observe work performed by Exide to the sand filter tank.

Hard Lead System Ventilation Modification

Exide continued modifications to the Hard Lead System ventilation on Thursday, January 22, 2015.

Tetra Tech personnel were onsite but did not observe work performed by Exide to the Hard Lead System ventilation.

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.

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 <u>Mitigation Plan for Construction of Risk Reducing Measures</u>, <u>RCRA RFI Sampling, and Other Plant Activities</u> 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			
West Yard Sump Piping	Ongoing - on hold			
Installation of High Speed Doors	Started			
Santa Maria Tank 12	Ongoing			
Replacement of Blast Furnace Partial	Ongoing			
Enclosure	Ongoing			
Blast Furnace Activities	Ongoing			
Blast Furnace Tray Type Wet Scrubbing	Ongoing			
System Installation	Ongoing			
Reverb Furnace Feed Modification	Ongoing			
Installation of Rotary Dryer Regenerative	Ongoing			
Thermal Oxidizer				
Storm Water Repair – 3 Manholes	Ongoing – on hold			
Repurposing of North Reverb Baghouse	Ongoing			
Installation of Blast RTO	Ongoing			
Reverb Feed Room/Corridor Floors	Started			
Building Negative Pressure Monitoring Upgrade	Ongoing			
#5 Sand Filter Tank in the Waste Water	Complete			
Treatment	Complete			
Hard Lead System Ventilation Hood	Ongoing			
Modification	Chigoing			
Blast Furnace Slag Tap Ventilation Hood	Ongoing – on hold			
Modification	Origoning – on noid			
Cleaning of Assorted Materials in Total	Ongoing			
Enclosure				
Various Work Methods in Total Enclosure	Ongoing			
RCRA RFI Soil Sampling	Starting			

WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
Jan. 29 – Feb. 4	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
	 Cleaning of Assorted Materials in Total Enclosure Continues
	 Various Work Methods in Total Enclosure Continues
	West Yard Sump Piping
	 Installation of High Speed Doors
	Santa Maria Tank
	Building Negative Pressure Upgrade

Week	Anticipated Activities		
Feb. 5 - Feb. 11	 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 		
	 Cleaning of Assorted Materials in Total Enclosure Continues 		
	 Various Work Methods in Total Enclosure Continues 		
	 Installation of High Speed Doors 		
	 Building Negative Pressure Monitoring Upgrade 		

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

- o #5 Sand Filter Tank in the Waste Water Treatment Plant COMPLETE
- o Reverb Feedroom/Corridor Floors 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 22, 2015 through January 28, 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,

FOR !

Nick Somogyi Project Engineer

ATTACHMENTS: Gant Chart Schedule Site Map

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Gant Chart Schedule

Project Schedule Week of 1/22/15 – 2/11/15 *Rev: 1/29/2015*



TECHNOLOGIES Recycling Division, Vernon, CA					1	01/23/15	01/30/15	02/06/15		
Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	×	22 23 2	4 25 26 27 28	23 30 31 01 02 03 04	05 06 07 08 03 10 1
Ex43	West Yard Sump Piping	West Yard	137 days	9/29/14	2/13/15	90%				the second
2a	Dust Removal for Structure	Total Enclosure	152 days	9/29/14	2/28/15	90%				
Ex73	Stormwater Repair - 3 Manholes	Yards	98 days	10/31/14	2/6/15	93%				
Ex44	Underground Pipe Project	South Yard	80 days	11/3/14	1/22/15	100%				
Ex72	Cleaning of Assorted Materials in Total Enclosure	Total Enclosure	130 days	11/20/14	3/30/15	55%				
Ex76	Various Work Methods in Total Enclosure	Total Enclosure	129 days	11/21/14	3/30/15	54%				
Ex33	Building Negative Pressure Monitoring Upgrade	General	77 days	12/1/14	2/16/15	99%				and the second second
5b	Blast Furnace Activities	Blast Furnace	73 days	12/16/14	2/27/15	50%				
4	RCRA RFI Soil Sampling	General	43 days	2/4/15	3/19/15	0%				
Ex83	RFI Soil Sampling Supplemental	General	43 days	2/4/15	3/19/15	0%				
3a	Blast Furnace Tray Type Wet Scrubbing System	BH Building	91 days	12/16/14	3/17/15	15%			the second s	
Ex84	Repurposing of North Reverb Baghouse	BH Building	67 days	12/22/14	2/27/15	45%				
3c	Replacement of Blast Furnace Partial Enclosure	Blast Furnace	66 days	12/16/14	2/20/15	30%				and the second second
3i	Installation of Rotary Dryer Regenerative Thermal Oxidizer	BH Building	64 days	12/16/14	2/18/15	40%				
Ex86/3k	Installation of Blast RTO	Smelting	78 days	12/22/14	3/10/15	15%				
Ex87	#5 Sand Filter Tank in the Waste Water Treatment	WWTP	11 days	1/12/15	1/23/15	100%				
ЗЬ	Hard Lead System Ventilation Modification	BH Building	67 days	1/12/15	3/20/15	5%				
3g	Reverb Furnace Feed Modification	Reverb	59 days	1/19/15	3/19/15	5%				
3f	Blast Furnace Slag Tap Ventilation Hood Modification	Blast Furnace	38 days	1/12/15	2/19/15	2%				
Ex88	Reverb Feedroom / Corridor Floors	Reverb Feedroom / Corridor	100 days	2/2/15	5/13/15	0%				
2d	Installation of High Speed Doors	Baghouse Building	14 days	1/26/15	2/8/15	50%				

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_012915.pptx

<u>Site Map</u>

EXIDE TECHNOLOGIES Mitigation Project Map Layout

<u>Week 1/22/15 – 2/11/15</u> *Rev: 1/29/2015*

Ex43. West Yard Sump Piping 2a. Dust Removal Ex73. Stormwater Repair – 3 Manholes Ex44. Underground Pipe Project **Ex81**. Removal & Shipment of Spent Furnace Brick & Refractory **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 **3i.** Installation of HEPA Filters on MAC Baghouses Ex86 / 3k. Installation of Blast RTO **Ex87.** #5 Sand Filter Tank in the Waste Water Treatment 3b. Hard Lead System Ventilation Modification 3g. Reverb Furnace Feed Modification 3f. Blast Furnace Slag Tap Ventilation Hood Modification Ex88. Reverb Feedroom / Corridor Floors 2d. Installation of High Speed Doors

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_012915.pptx

