

August 25, 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

PROJECT:EXIDE TECHNOLOGIES FACILITY ID NO. 124868,
ORDER OF ABATEMENT CASE NO. 3151-32RE:WEEKLY STATUS REPORT # 49 (8/13/15 - 8/19/15)

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 August 13, 2015 through August 19, 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				
EX 97	Removal and Shipment of Blast Feed	Total Enclosure Building Under Negative Pressure				
EX 100	Removal and Shipment of Tin and Antimony Dross	Total Enclosure Building Under Negative Pressure				
EX 103	Removal and Shipment of Lead Dross and Plates	Total Enclosure Building Under Negative Pressure				

Dust Removal

Dust removal is currently on hold, but will be scheduled and conducted on an as needed basis.

RCRA RFI Soil Sampling

Advanced Geoscience and their subcontractors Cascade Drilling, and Avocet continued RCRA RFI Soil Sampling at offsite locations that are not under oversight by Tetra Tech Inc. On Thursday, August 13, 2015 and Friday, August 14, 2015 Cascade Drilling and Avocet were onsite to develop wells CB-2, CB-3 and CB-5. Prior to well development, 6-mil plastic sheeting was placed on the ground around the well. All water generated during well development was placed into 55-gallon drums, and transported into the Total Enclosure Building. Observation of well development activities did not identify any issues and were in compliance with the mitigation plan. RCRA RFI Soil Sampling activities on the Exide property are anticipated to resume during the next reporting period.

Soil Sampling – 2nd Round Feed Room Enclosure

Advanced Geoscience did not complete any soil sampling activities within the Total Enclosure Building during this reporting period. The second round of soil sampling beneath the feed room floor will resume in early September.

Removal and Shipping of Blast Feed

Exide completed decontamination of the equipment used to load the Blast Feed material on Monday, August 17, 2015.

Verification activities included:

- Confirmation that negative pressure was maintained by checking the gauge on the Total Enclosure Building.
- Visual observation of each phase of the decontamination.

Removal and Shipment of Tin and Antimony Dross

Exide personnel continued shipment of the drummed Antimony Dross to Conecsus in Terrell, TX, on Thursday, August 13, 2015. Exide completed shipment of Antimony Dross on August 14, 2015. The pallets of Antimony Dross drums were loaded onto van trailers at the Blue Lead MRO Warehouse dock in the West Yard of the facility. Once loaded, the trailers were taken through the West Yard truck wheel wash unit, scaled and dispatched through the Bandini Boulevard gate. A total of 4 trucks of Antimony Dross were shipped to Conecsus during this reporting period.

Verification activities included:

• Visual observation witnessed loading and shipment of 3 trucks of Antimony Dross on August 13, 2015, and 1 truck of Antimony Dross on August 14, 2015.

Removal and Shipping of Lead Dross and Plates

Exide completed decontamination of the equipment used to load the Lead Dross and plates on Monday, August 17, 2015.

Verification activities included:

- Confirmation that negative pressure was maintained by checking the gauge on the Total Enclosure Building.
- Visual observation of decontamination.

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 RCRA RFI Sampling, and Other Plant</u> <u>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 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	Ongoing – on hold				
RCRA RFI Soil Sampling	Ongoing				
2 nd Round Feed Room Soil Sampling	Ongoing – on hold				
Removal and Shipment of Blast Feed	Complete				
Removal and Shipment of Tin and Antimony Dross	Complete				
Removal and Shipment of Lead Dross and Plates	Complete				

WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities					
August 20 – August 26	Dust Removal On Hold					
	 RCRA RFI Soil Sampling Resumes 2nd Round of Feed Room Floor Sampling On Hold 					

Week	Anticipated Activities
August 27 - Sept. 2	Dust Removal Resumes
	 RCRA RFI Soil Sampling Continues 2nd Round of Feed Room Floor Sampling On Hold

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

0	Removal and Shipment of Blast Feed	COMPLETE
0	Removal and Shipment of Tin and Antimony Dross	COMPLETE
0	Removal and Shipment of Lead Dross and Plates	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 August 13, 2015 through August 19, 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

Project Schedule Week of 8/13/15 – 9/2/15 *Rev: 8/20/2015*

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ÆX	IDE									
TECHN	TECHNOLOGIES Recycling Division, Vernon, CA					08/14/15	08/21/15	08/28/15		
Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	13 14	15 16 17 18 19 20	21 22 23 24 25 26 27	28 29 30 31 01 02
2a	Dust Removal for Structure	Total Enclosure	347 days	9/29/14	9/11/15	85%				
Ex72	Cleaning of Assorted Materials in Total Enclosure	Total Enclosure	406 days	11/20/14	12/31/15	67%				
Ex76	Various Work Methods in Total Enclosure	Total Enclosure	405 days	11/21/14	12/31/15	67%				
4	RCRA RFI Soil Sampling	General	198 days	2/18/15	944/15	65%				
Ex83	RFI Soil Sampling Supplemental	General	198 days	2/18/15	944/15	65%				
Ex94	2nd Round Feed Room Soil Sampling	General	207 days	3/9/15	10/2/15	40%				
Ex97	Removal & Shipment of Blast Feed*	Blast Furnace Feed Room	80 days	5/25/15	8/13/15	100%				
Ex100	Removal Sn Sb Dross	Blast Furnace Feed Room	43 days	7/1/15	8/13/15	100%				
Ex103	Removal & Shipment of Drosses & Plates	Blast Furnace Feed Room	29 days	7/15/15	8/13/15	100%				

* - (Ex-97) Blast Feed refers to Reverb Slag & Cast Iron.

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_082015.pptx

Site Map

ECHNOLOGIES Mitigation Project Map Layout Week 7/23/15 – 8/12/15

Rev: 7/30/15

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
Ex 97. Removal & Shipment of Blast Feed
Ex 100. Removal of Tin/Antimony Dross

Ex 103. Removal & Shipment of Drosses & Plates

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_082015.pptx

