

SOUTH COAST AOMD CLERK OF THE BOARDS

CN: 15279

January 22, 2016

16 JAN 22 P3:22

Ms. Cher Snyder Assistant Deputy Executive Officer 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 # 69 (12/31/15 - 1/6/16)

Dear Ms. Snyder,

Tetra Tech Inc. is pleased to present the following Weekly Status Report for the above referenced project. This report covers the period of December 31, 2015 through January 6, 2016.

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)
EX83/4	RCRA RFI Soil Sampling	Temporary Enclosure Under Negative Pressure
EX107	Install Risers on Stormwater Sensor Covers	Pre-cleaning and Wet Methods
EX109	Secure Hi-Vol Propane Tanks	Temporary Enclosure Under Negative Pressure*

Dust Trak monitoring performed for this work item.

RCRA RFI Soil Sampling

No work occurred related to the RCRA RFI Soil Sampling. RCRA RFI Soil Sampling activities on the Exide property will continue once a revised scope of work to address changed field conditions is developed and approved by the regulatory agencies.

Install Risers on Stormwater Sensor Covers

No work occurred related to the installation of risers on the storm water manhole sensor covers. Exide personnel had previously installed the first riser and completed testing the riser to ensure that the repair method is appropriate. Additional risers are being manufactured offsite, and installation activities will resume once fabrication is complete.

Secure Hi-Vol Propane Tanks

On Monday January 4, 2016, Castlerock began constructing temporary enclosures over the propane tanks located at each of the Hi-Vol fence line monitoring locations around the perimeter of the plant. Once Castlerock completed installation of the temporary enclosures, Advanced Construction began work to install seismic restraints on the propane tanks. These activities included forming and pouring new concrete slabs at each of the locations. The repair activities completed to date have been in accordance with the approved mitigation plan and will continue into the next reporting period.

Verification activities included:

- Periodic visual inspection of the temporary enclosure to confirm that no visible leaks or tears were present, that the structural integrity of the enclosure was maintained and that it was 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.
- Downwind Dust Trak monitoring of the repair areas when activities were conducted, to monitor for fugitive dust emissions. Review of Dust Trak data did not indicate that work associated with securing the Hi-Vol Propane Tanks was generating fugitive dust emissions.
- During periods of intense rain on January 5, 2016 and January 6, 2016 Dust Trak monitoring was suspended to prevent damage to the monitoring equipment.

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
None	None

WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
Jan. 7 – Jan. 13	 Install Riser on Stormwater Sensor Covers Resumes Secure Hi-Vol Propane Tanks Continues

Week	Anticipated Activities
Jan. 14 - Jan. 20	 Install Riser on Stormwater Sensor Covers Continues Secure Hi-Vol Propane Tanks Continues

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

o Secure Hi-Vol Propane Tanks: BEGAN

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 December 31, 2015 through January 6, 2016. Please note that no Mitigation Plan related activities took place on Thursday, December 31, 2015, and Friday, January 1, 2016, therefore Tetra Tech was not on-site. 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

<u>ATTACHMENTS:</u> Gant Chart Schedule Site Map Field Monitoring Data Gant Chart Schedule

Project Schedule Week of 12/31/15 – 01/20/16 *Rev: 01/07/2016*

Recycling Division, Vernon, CA							1/2/	2016				01/09/	16			(1/16/16			01
Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	31	01 0	02 03	04	05	06 07	08	09	10	11 12 1	3 14 15	5 16	17 18	19 20
Ex 72	Cleaning of Assorted Materials in Total Enclosure	Total Enclosure	497 days	11/20/14	3/31/16	80%			-					-						
Ex 76	Various Work Methods in Total Enclosure	Total Enclosure	496 days	11/21/14	3/31/16	80%														
4	RCRA RFI Soil Sampling	General	407 days	2/18/15	3/31/16	97%														
Ex 83	RFI Soil Sampling Supplemental	General	407 days	02/18/15	3/31/16	97%														
Ex 107	Install Riser on Storm Water Sensor Covers	General	30 days	12/01/15	01/29/16	1%														
Ex 109	Secure HiVol Propane Tanks	General	15 days	01/04/16	01/22/16	27%														

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_01/07/16.pptx

Site Map



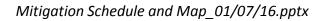
Mitigation Project Map Layout

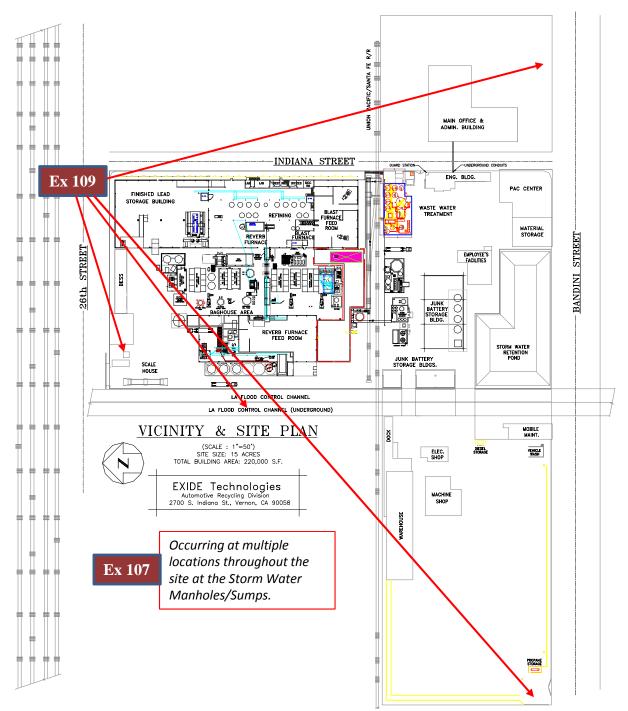
<u>Week 12/31/15 – 01/20/16</u> *Rev: 01/07/16*

4. RCRA RFI Soil Sampling

- Ex 83. RFI Soil Sampling Supplemental Ex 72. Cleaning of Assorted Materials in Total Encl.
- Ex 76. Various Work Methods in Total Enclosure
- Ex 107. Install Risers on Storm Water Sensor Covers
- Ex 109. Secure Hi-Vol Propane Tanks

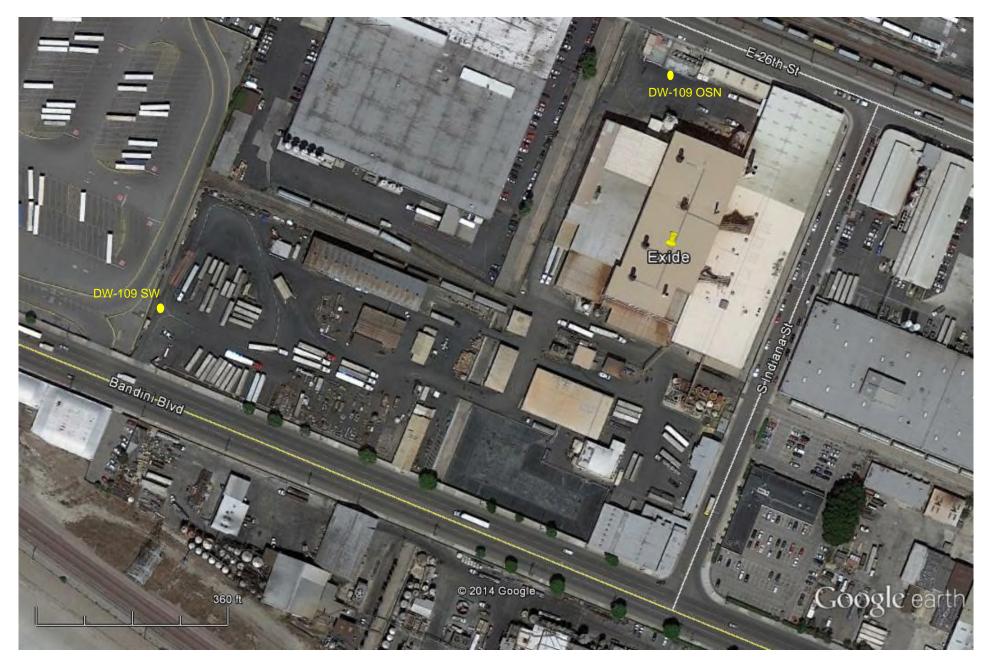
Numbering system correlates with Mitigation plan document. Ex refers to additional work part of Sec. 6b in the Mitigation plan document.





Monitoring Results / Reports (Monday, January 4, 2016)

ACTIVITY	SERIAL NUMBER	LOCATION
EX-109 Secure Hi-Vol Propane Tanks (SW)	8533113401	Downwind
EX-109 Secure Hi-Vol Propane Tanks (OSN)	8533141005	Downwind



Exide Technologies 2700 Indiana Street Vernon, CA 90058

1/4/2016 EX-109

Monitoring Results / Reports (Tuesday, January 5, 2016)

ACTIVITY	SERIAL NUMBER	LOCATION
EX-109 Secure Hi-Vol Propane Tanks (SW)	8533141005	Downwind

Test 020

Instr	ument	Data Properties			
Model	DustTrak DRX	Start Date	01/04/2016		
Instrument S/N	8533113401	Start Time	13:18:47		
			01/04/2016		
		Stop Time	13:53:47		
		Total Time	0:00:35:00		
		Logging Interval	300 seconds		

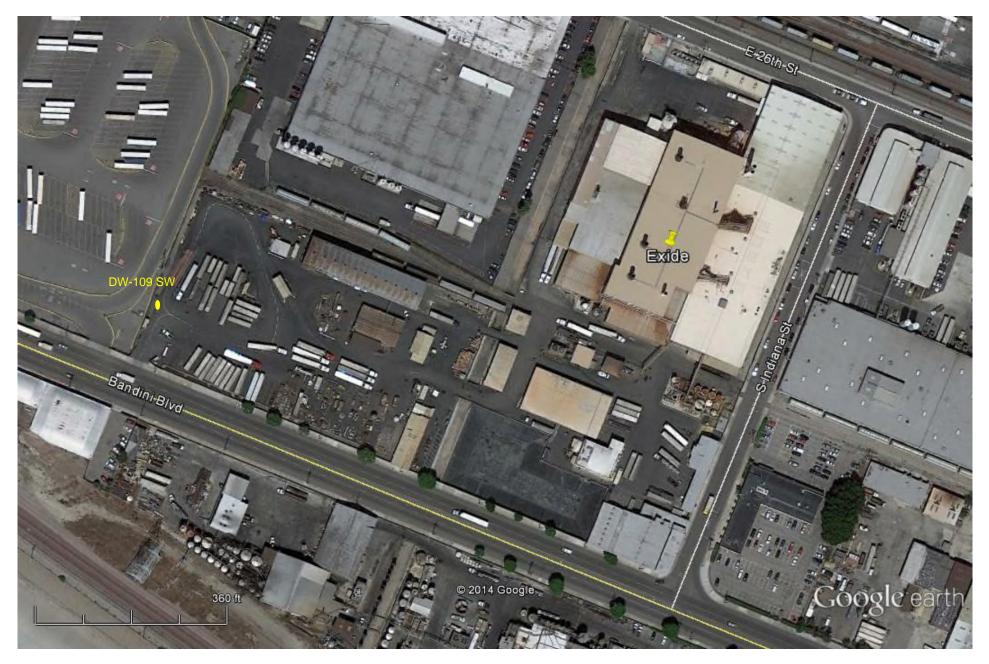
	Test Data									
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3			
1	01/04/2016	13:23:47	0.014	0.014	0.015	0.015	0.015			
2	01/04/2016	13:28:47	0.013	0.013	0.013	0.013	0.013			
3	01/04/2016	13:33:47	0.013	0.013	0.013	0.014	0.014			
4	01/04/2016	13:38:47	0.013	0.014	0.014	0.014	0.014			
5	01/04/2016	13:43:47	0.014	0.014	0.015	0.015	0.015			
6	01/04/2016	13:48:47	0.014	0.014	0.014	0.014	0.014			
7	01/04/2016	13:53:47	0.013	0.014	0.014	0.014	0.014			

Test 017

Instr	rument	Data Properties			
Model	DustTrak DRX	Start Date	01/04/2016		
Instrument S/N	8533141005	Start Time	10:20:26		
		Stop Date	01/04/2016		
		Stop Time	13:55:26		
		Total Time	0:03:35:00		
		Logging Interval	300 seconds		

Test Data							
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3
1	01/04/2016	10:25:26	0.021	0.021	0.021	0.022	0.022
2	01/04/2016	10:30:26	0.020	0.020	0.021	0.021	0.022
3	01/04/2016	10:35:26	0.023	0.023	0.023	0.024	0.024
4	01/04/2016	10:40:26	0.022	0.023	0.023	0.024	0.024
5	01/04/2016	10:45:26	0.021	0.021	0.022	0.022	0.023
6	01/04/2016	10:50:26	0.017	0.017	0.018	0.019	0.019
7	01/04/2016	10:55:26	0.015	0.015	0.015	0.016	0.016
8	01/04/2016	11:00:26	0.016	0.016	0.017	0.017	0.018
9	01/04/2016	11:05:26	0.018	0.018	0.018	0.019	0.019
10	01/04/2016	11:10:26	0.019	0.019	0.019	0.020	0.020
11	01/04/2016	11:15:26	0.020	0.021	0.021	0.022	0.022
12	01/04/2016	11:20:26	0.020	0.020	0.020	0.021	0.021
13	01/04/2016	11:25:26	0.019	0.019	0.020	0.020	0.020
14	01/04/2016	11:30:26	0.016	0.016	0.017	0.017	0.017
15	01/04/2016	11:35:26	0.017	0.017	0.018	0.018	0.018
16	01/04/2016	11:40:26	0.018	0.018	0.018	0.019	0.019
17	01/04/2016	11:45:26	0.020	0.021	0.021	0.022	0.022
18	01/04/2016	11:50:26	0.020	0.021	0.021	0.022	0.022
19	01/04/2016	11:55:26	0.020	0.020	0.020	0.021	0.021
20	01/04/2016	12:00:26	0.019	0.019	0.019	0.020	0.020
21	01/04/2016	12:05:26	0.019	0.019	0.019	0.020	0.020
22	01/04/2016	12:10:26	0.019	0.020	0.020	0.021	0.021
23	01/04/2016	12:15:26	0.018	0.018	0.019	0.019	0.020
24	01/04/2016	12:20:26	0.019	0.019	0.019	0.020	0.020
25	01/04/2016	12:25:26	0.016	0.016	0.017	0.018	0.018
26	01/04/2016	12:30:26	0.009	0.009	0.009	0.010	0.010
27	01/04/2016	12:35:26	0.008	0.008	0.008	0.009	0.009
28	01/04/2016	12:40:26	0.010	0.010	0.010	0.011	0.011
29	01/04/2016	12:45:26	0.013	0.013	0.013	0.014	0.014
30	01/04/2016	12:50:26	0.013	0.013	0.014	0.014	0.014
31	01/04/2016		0.013	0.013	0.014	0.014	0.014
32	01/04/2016	13:00:26	0.011	0.011	0.011	0.012	0.012
33	01/04/2016	13:05:26	0.010	0.010	0.011	0.011	0.011
34	01/04/2016	13:10:26	0.009	0.009	0.010	0.010	0.010
35	01/04/2016	13:15:26	0.008	0.008	0.009	0.009	0.009

Test Data							
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3
36	01/04/2016	13:20:26	0.009	0.009	0.009	0.010	0.010
37	01/04/2016	13:25:26	0.009	0.009	0.009	0.010	0.010
38	01/04/2016	13:30:26	0.007	0.007	0.007	0.008	0.008
39	01/04/2016	13:35:26	0.007	0.007	0.007	0.008	0.008
40	01/04/2016	13:40:26	0.006	0.006	0.006	0.007	0.007
41	01/04/2016	13:45:26	0.007	0.007	0.007	0.008	0.008
42	01/04/2016	13:50:26	0.007	0.008	0.008	0.008	0.009
43	01/04/2016	13:55:26	0.006	0.006	0.007	0.007	0.008



Exide Technologies 2700 Indiana Street Vernon, CA 90058

1/5/2016 EX-109

Test 018

Instr	ument	Data Properties		
Model	DustTrak DRX	Start Date	01/05/2016	
Instrument S/N	8533141005	Start Time	08:01:52	
		Stop Date	01/05/2016	
		Stop Time	08:21:52	
		Total Time	0:00:20:00	
		Logging Interval	300 seconds	

Test Data							
Data Point	Date	Time	PM1 mg/m^3	PM2.5 mg/m^3	RESP mg/m^3	PM10 mg/m^3	TOTAL mg/m^3
1	01/05/2016	08:06:52	0.016	0.017	0.017	0.017	0.018
2	01/05/2016	08:11:52	0.018	0.019	0.019	0.019	0.019
3	01/05/2016	08:16:52	0.016	0.017	0.017	0.018	0.018
4	01/05/2016	08:21:52	0.017	0.018	0.018	0.019	0.019