

SOUTH COAST ACHD CLERK OF THE BOARDS

February 9, 2016

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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. 124838,
ORDER OF ABATEMENT CASE NO. 3151-32RE:WEEKLY STATUS REPORT # 73 (1/28/16 - 2/3/16)

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 January 28, 2016 through February 3, 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*

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

Work related to the installation of risers on the storm water manhole sensor covers resumed and was completed on January 28, 2016. Exide personnel installed one new riser on January 28, 2016. Tetra Tech personnel were onsite to monitor mitigation plan work related to the installation of the riser on the storm water manhole sensor covers including downwind Dust Trak monitoring.

Verification activities included:

- Visual observation of the installation activities to verify compliance with the SCAQMD approved mitigation plan.
- 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 installation of risers on the storm water manhole covers was generating fugitive dust emissions.

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:

TAS	K ID	Major Work Item	Deviation(s)	CORRECTIVE ACTION	

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
Feb. 4 – Feb. 10	No Mitigation Work Scheduled

Week	Anticipated Activities
Feb. 11 - Feb. 17	 No Mitigation Work Scheduled

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

o Installation of Risers on Stormwater Sensor Covers: 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 January 28, 2016 through February 3, 2016. Please note that Mitigation Plan related activities only took place on Thursday, January 28, 2016. However, Tetra Tech was on-site on Monday, February 1, 2016 and Tuesday, February 2, 2016 until Exide personnel confirmed that the scheduled DTSC ordered work had been postponed. 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

J:\SCAQMD\Weekly Reports\Weekly Report #73\Exide Technologies Weekly Report 73 Final.docx

Gant Chart Schedule

Project Schedule Week of 01/28/16 – 02/17/16 *Rev: 02/04/2016*

TECHNOLOGIES Recycling Division, Vernon, CA					1/30/2016	02/06/16	02/13/16	02		
Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	28 29 30 31	01 02 03 04 05 06 07	08 09 10 11 12 13 14	15 16 17
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	01/28/16	100%				

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_02/04/16.pptx

Site Map



Mitigation Project Map Layout

$\frac{\text{Week } 01/28/16 - 02/17/16}{\text{Rev: } 02/04/16}$

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

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_02/04/16.pptx

Ex 107

Occurring at multiple locations throughout the site at the Storm Water Manholes/Sumps.

Monitoring Results / Reports (Thursday, January 28, 2016)

ACTIVITY	SERIAL NUMBER	LOCATION
EX-107 Install Risers on Stormwater Sensor Covers	8533113403	Downwind



Exide Technologies 2700 Indiana Street Vernon, CA 90058

1/28/2016 EX-107

Test 006

Instr	rument	Data Properties			
Model	Model DustTrak DRX		01/28/2016		
Instrument S/N	Instrument S/N 8533113403		08:31:50		
			01/28/2016		
			09:16:50		
			0:00:45:00		
			900 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	01/28/2016	08:46:50	0.007	0.008	0.009	0.012	0.012			
2	01/28/2016	09:01:50	0.007	0.008	0.010	0.012	0.012			
3	01/28/2016	09:16:50	0.006	0.007	0.009	0.012	0.013			