

SOUTH COAST A OMD CLERK OF THE BOARDS

March 11, 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. 3151-32

RE: WEEKLY STATUS REPORT # 76 (2/18/16 – 2/24/16)

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 February 18, 2016 through February 24, 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
N/A	Water Pipe Repair	Pre-cleaning w/ D-lead wipes*

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.

Water Pipe Repair

On Monday, February 22, 2016, Exide began repair activities on a leaking water pipe that carries water across the storm water channel that divides the West Yard and the South Yard. While an independent mitigation plan was not prepared for this task,

fugitive dust mitigation methods were incorporated into an email to the SCAQMD that was reviewed and approved. Prior to removal of the damaged section of pipe, the section of pipe to be removed was cleaned with D-lead wipes. Plastic sheeting was placed under the working area, the pipe was disconnected and the damaged section of pipe was placed on the plastic sheeting. The damaged section of pipe was wrapped and disposed of as hazardous waste. A new section of pipe was installed, and the water line was returned to service. Tetra Tech personnel were onsite to monitor work related to the pipe repair including upwind and downwind Dust Trak monitoring.

Verification activities included:

- Visual observation of the installation activities to verify compliance with the SCAQMD approved mitigation methods.
- Downwind Dust Trak monitoring of the areas when activities were conducted, to monitor for fugitive dust emissions. Review of Dust Trak data did not indicate that work associated with removal of the damaged pipe 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 Mitigation Plan for RCRA RFI Sampling, and Other Plant Activities 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
Feb. 25 – Mar. 2	No Mitigation Work Scheduled

Week	Anticipated Activities
Mar. 3 - Mar. 9	No Mitigation Work Scheduled

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

o Water Pipe Repair: COMPLETED

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:

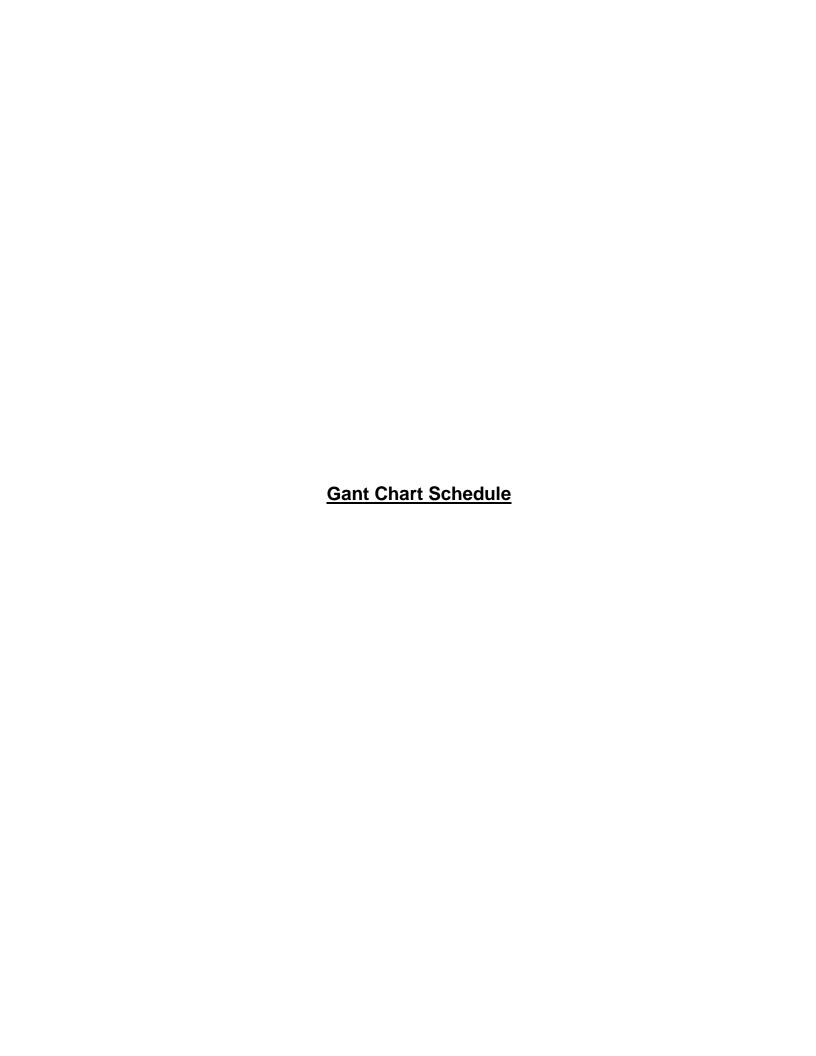
The summary provided herein covers the activities for the period of February 18, 2016 through February 24, 2016. Please note that while no Mitigation Plan related activities were scheduled, Tetra Tech was on-site to oversee pipe repair activities that had the potential to generate fugitive dust on Monday, February 22, 2016. 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



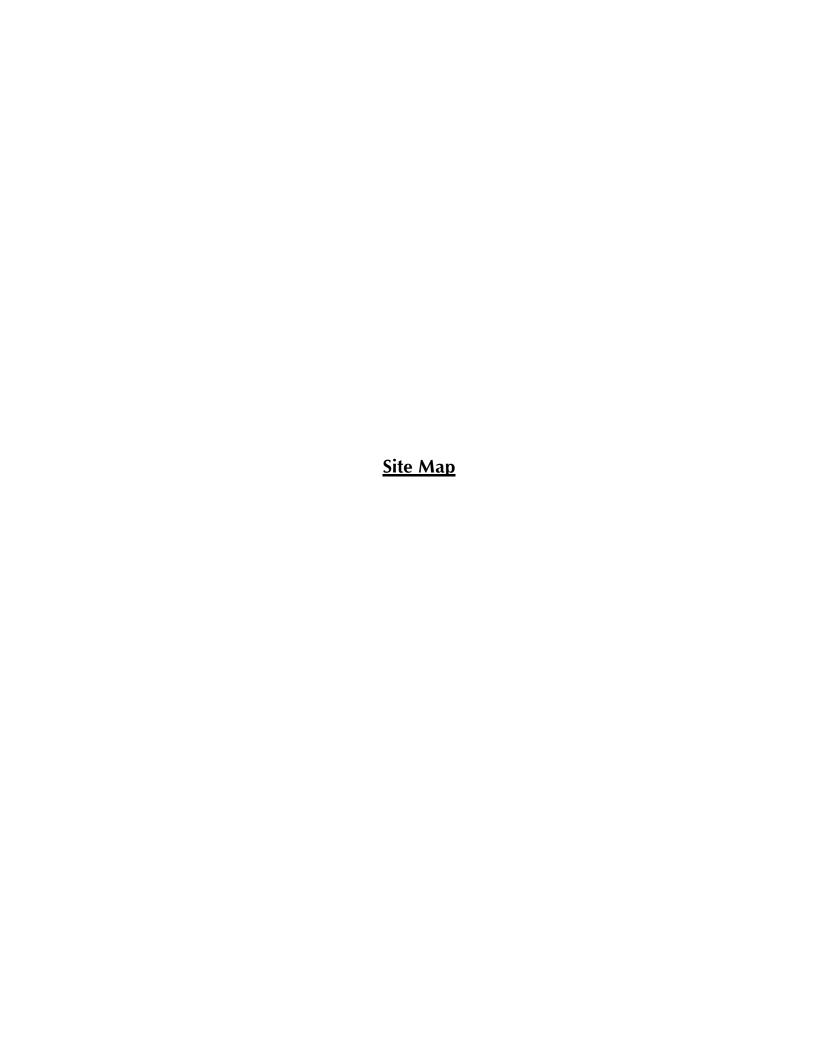
Project Schedule Week of 02/17/16 – 03/10/16

Rev: 02/24/2016

TECHNOLOGIES Recycling Division, Vernon, CA					2/20/2016	02/27/16	03/05/16	03/12/16		
Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	17 18 19 20 21	21 22 23 24 25 26 27	28 29 01 02 03 04 05	06 07 08 09 10
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%				

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_02/24/16.pptx





Mitigation Project Map Layout

Week 02/17/16 - 03/10/16

Rev: 02/24/16

4. RCRA RFI Soil Sampling

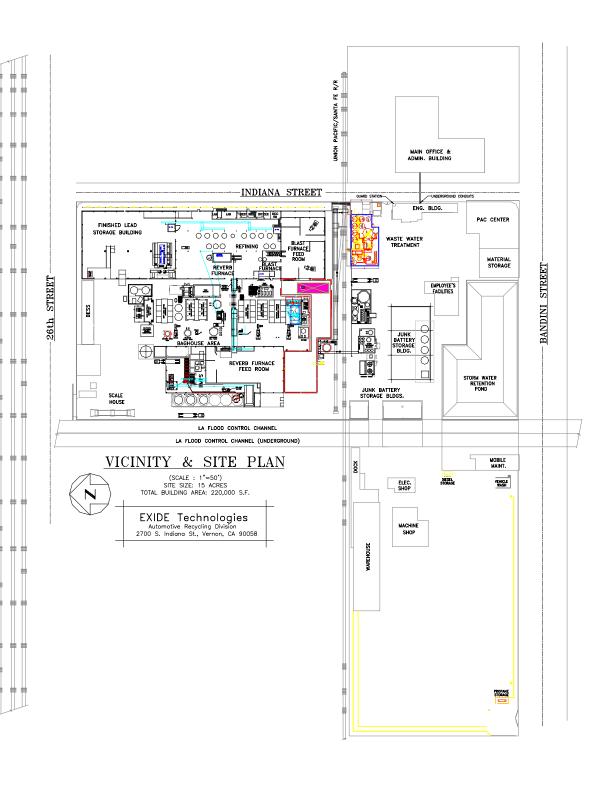
Ex 83. RFI Soil Sampling Supplemental

Ex 72. Cleaning of Assorted Materials in Total Encl.

Ex 76. Various Work Methods in Total Enclosure

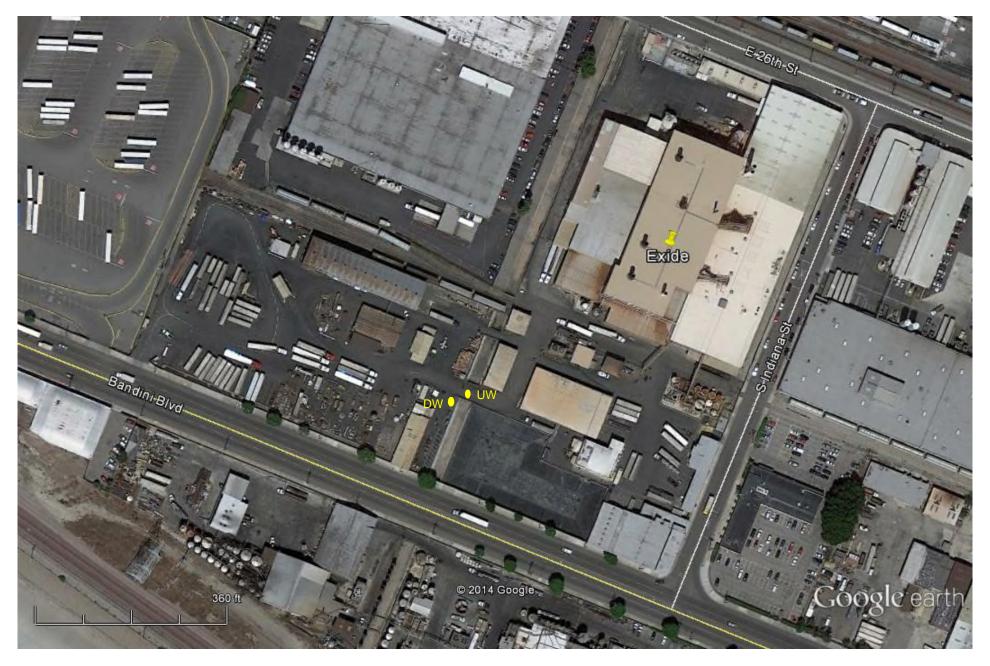
Numbering system correlates with Mitigation plan document. Ex refers to additional work part of Sec. 6b in the Mitigation plan document.

Mitigation Schedule and Map_02/24/16.pptx



Monitoring Results / Reports (Monday, February 22, 2016)

ACTIVITY	SERIAL NUMBER	LOCATION
Pipe Repair	8533152408	Upwind
Pipe Repair	8533113403	Downwind



Exide Technologies 2700 Indiana Street Vernon, CA 90058

2/22/2016 Pipe Repair

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Test 013

Inst	rument	Data Properties		
Model DustTrak DRX		Start Date	02/22/2016	
Instrument S/N	8533113403	Start Time	11:39:51	
		Stop Date	02/22/2016	
		Stop Time	13:39:51	
		Total Time	0:02:00:00	
		Logging Interval	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	02/22/2016	11:54:51	0.018	0.019	0.020	0.022	0.023	
2	02/22/2016	12:09:51	0.016	0.017	0.018	0.019	0.020	
3	02/22/2016	12:24:51	0.017	0.018	0.019	0.021	0.021	
4	02/22/2016	12:39:51	0.016	0.017	0.018	0.020	0.021	
5	02/22/2016	12:54:51	0.017	0.018	0.019	0.021	0.021	
6	02/22/2016	13:09:51	0.020	0.022	0.022	0.024	0.024	
7	02/22/2016	13:24:51	0.019	0.020	0.021	0.023	0.024	
8	02/22/2016	13:39:51	0.013	0.015	0.016	0.018	0.019	

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Test 003

Inst	rument	Data Properties		
Model DustTrak DRX		Start Date	02/22/2016	
Instrument S/N	8533152408	Start Time	11:36:28	
		Stop Date	02/22/2016	
		Stop Time	13:36:28	
		Total Time	0:02:00:00	
		Logging Interval	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	02/22/2016	11:51:28	0.043	0.044	0.045	0.046	0.046	
2	02/22/2016	12:06:28	0.038	0.039	0.039	0.040	0.040	
3	02/22/2016	12:21:28	0.041	0.042	0.042	0.043	0.043	
4	02/22/2016	12:36:28	0.040	0.041	0.042	0.043	0.043	
5	02/22/2016	12:51:28	0.040	0.040	0.041	0.042	0.042	
6	02/22/2016	13:06:28	0.050	0.051	0.051	0.052	0.052	
7	02/22/2016	13:21:28	0.049	0.050	0.050	0.052	0.052	
8	02/22/2016	13:36:28	0.039	0.039	0.040	0.041	0.042	

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