

SOUTH COAST AOMD CLERK OF THE BOARDS

May 13, 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 # 86 (4/28/16 – 5/4/16)

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 April 28, 2016 through May 4, 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
EX115	Sediment Removal from Equalization Tanks	Maintain Wetted Surfaces
DTSC ORDERED	Clean Los Angeles County Flood Control Open Channel	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.

Sediment Removal from Equalization Tanks

No work occurred related to the sediment removal from the Equalization Tanks. Removal of sediment from Equalization Tank #1 will occur during a future reporting period when it will not impact water treatment activities.

Cleaning Los Angeles County Flood Control Open Channel

Exide is currently cleaning the Los Angeles County Flood Control Open Channel that dissects the site and runs from 26th Street to the Los Angeles River. There is no mitigation plan for the open channel cleaning. However, mitigation measures were incorporated into the DTSC work plan that was reviewed and approved by both DTSC and SCAQMD. These measure include performance of all cleaning activities within a temporary enclosure under vacuum and collection of all generated liquids. Tetra Tech personnel were onsite to monitor activities related to the open channel cleaning work on May 4, 2016, when it occurred north of the first onsite channel crossing including upwind and downwind Dust Trak monitoring.

Verification activities included:

- Visual observation of the open channel cleaning activities to verify compliance with the DTSC and SCAQMD approved work plan.
- Upwind and 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 the open channel cleaning was generating fugitive dust emissions.
- 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 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.
- Visual confirmation that the HEPA vacuums being used were SCAQMD permitted for lead.

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
May 5 – May 11	 Install Surface Impoundment Leak Detection Sumps Begins.

Week	Anticipated Activities
May 12 - May 18	 Install Surface Impoundment Leak Detection Sumps Continues. RCRA RFI Soil Sampling

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

o None at this time.

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:

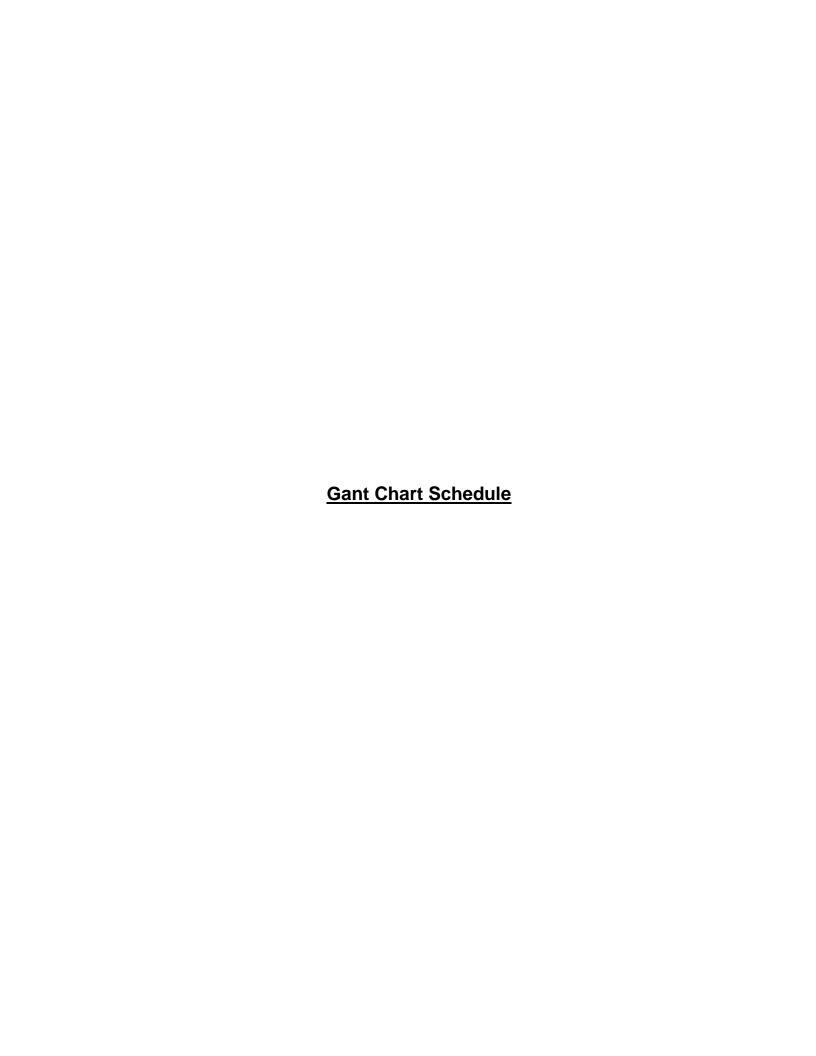
The summary provided herein covers the activities for the period of April 28, 2016 through May 4, 2016. Tetra Tech personnel were not onsite other than to attend routine weekly meetings on Thursday, April 28, 2016, and Monday, May 2, 2016; and on May 4, 2016 to observe the work plan activities described herein. 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 Forms



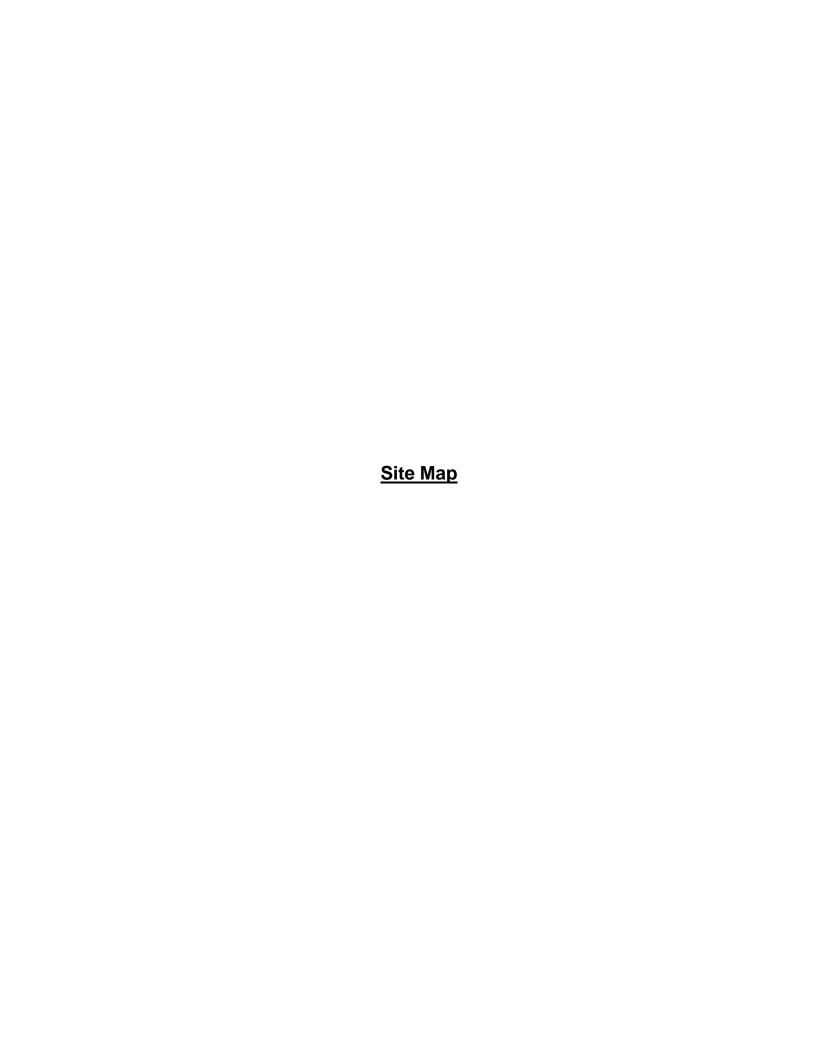
Project Schedule Week of 04/27/16 – 05/19/16

Rev: 05/04/2016

EX TECHN	DE Recycling Division	n, Vernon, CA					04/30/16		05/07/16		05/14/16	05/21/.
Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	27 28 29 30	0 01 02	03 04 05 06	07 08	09 10 11 12 13 14 15	5 16 17 18 19
Ex 72	Cleaning of Assorted Materials in Total Enclosure	Total Enclosure	619 days	11/20/14	07/31/16	80%						
Ex 76	Various Work Methods in Total Enclosure	Total Enclosure	618 days	11/21/14	07/31/16	80%						
4	RCRA RFI Soil Sampling	General	529 days	2/18/15	07/31/16	97%					*	
Ex 83	RFI Soil Sampling Supplemental	General	529 days	02/18/15	07/31/16	97%					*	
Ex 115	Sediment Removal from EQ Tanks	WWTP	5 days	03/07/16	07/31/16	50%						
Ex 119	Install Surface Impoundment Leak Detection Sumps	South Yard	15 days	05/09/16	05/27/16	0%						

^{* ~} this work is camera investigation on the Former Production Well (using a drill rig).

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





Mitigation Project Map Layout

Week 04/27/16 - 05/19/16 Rev: 05/04/2016

4. RCRA RFI Soil Sampling

Ex 83. RFI Soil Sampling Supplemental

Ex 72. Cleaning of Assorted Materials in Total Encl.

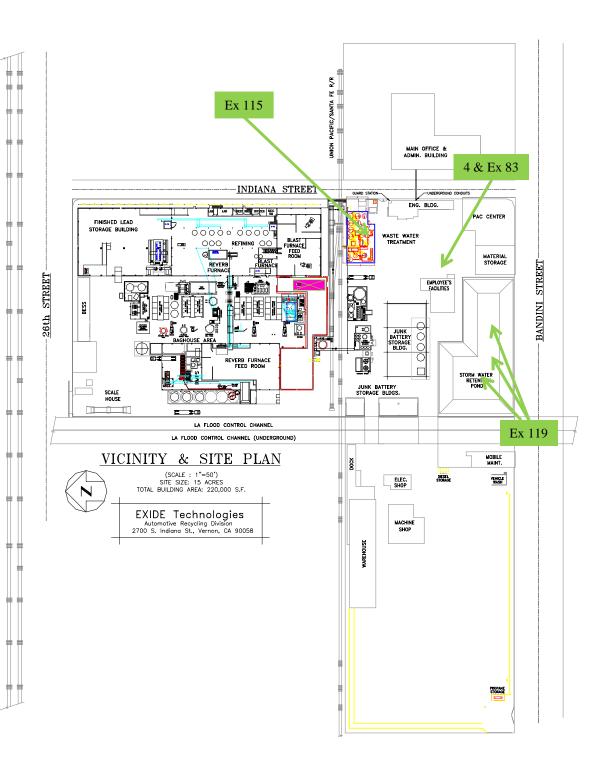
Ex 76. Various Work Methods in Total Enclosure

Ex 115. Sediment Removal from EQ Tanks

Ex 119. Install Surface Impoundment Leak Detection Sumps

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_05/04/2016.pptx



Monitoring Results / Reports (Wednesday, May 4, 2016)

ACTIVITY	SERIAL NUMBER	LOCATION
Cleaning LA County Open Channel	8533152408	Upwind
Cleaning LA County Open Channel	8533141005	Downwind

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Test 008

Inst	rument	Data Properties		
Model	Model DustTrak DRX		05/04/2016	
Instrument S/N	8533141005	Start Time	12:29:18	
		Stop Date	05/04/2016	
		Stop Time	15:00:58	
		Total Time	0:02:31:00	
		Logging Interval	910 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	05/04/2016	12:44:28	0.038	0.039	0.040	0.041	0.042		
2	05/04/2016	12:59:38	0.036	0.037	0.038	0.038	0.039		
3	05/04/2016	13:14:48	0.031	0.032	0.033	0.034	0.034		
4	05/04/2016	13:29:58	0.028	0.029	0.029	0.030	0.030		
5	05/04/2016	13:45:08	0.025	0.026	0.026	0.028	0.028		
6	05/04/2016	14:00:18	0.022	0.023	0.023	0.024	0.025		
7	05/04/2016	14:15:28	0.017	0.018	0.018	0.020	0.020		
8	05/04/2016	14:30:38	0.017	0.017	0.018	0.018	0.019		
9	05/04/2016	14:45:48	0.017	0.018	0.018	0.019	0.019		
10	05/04/2016	15:00:58	0.016	0.016	0.017	0.017	0.017		

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Test 015

Inst	rument	Data Properties		
Model	Model DustTrak DRX		05/04/2016	
Instrument S/N	8533152408	Start Time	12:28:04	
		Stop Date	05/04/2016	
		Stop Time	14:58:04	
			0:02:30:00	
		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	05/04/2016	12:43:04	0.041	0.042	0.042	0.043	0.044		
2	05/04/2016	12:58:04	0.039	0.040	0.041	0.042	0.042		
3	05/04/2016	13:13:04	0.037	0.038	0.038	0.039	0.039		
4	05/04/2016	13:28:04	0.033	0.034	0.035	0.035	0.035		
5	05/04/2016	13:43:04	0.028	0.029	0.029	0.030	0.030		
6	05/04/2016	13:58:04	0.029	0.030	0.031	0.032	0.032		
7	05/04/2016	14:13:04	0.022	0.023	0.024	0.025	0.025		
8	05/04/2016	14:28:04	0.020	0.021	0.021	0.022	0.022		
9	05/04/2016	14:43:04	0.021	0.022	0.022	0.022	0.022		
10	05/04/2016	14:58:04	0.018	0.018	0.019	0.019	0.019		

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