



June 19, 2017

CN: 15279

Mr. Scott Caso
Senior Enforcement Manager
Office of Compliance and Enforcement
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

SOUTH COAST AQMD
CLERK OF THE BOARDS

JUN 21 P3:00

**PROJECT: EXIDE TECHNOLOGIES FACILITY ID NO. 124838,
ORDER FOR ABATEMENT CASE NO. 3151-32**
RE: WEEKLY STATUS REPORT # 139 (5/4/17 – 5/10/17)

Dear Mr. Caso,

Tetra Tech Inc. is pleased to present the following Weekly Status Report for the above referenced project. This report covers the period of May 4, 2017 through May 10, 2017.

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
EX127	Ship Generator and Auxiliary Equipment	HEPA vacuum, wet wipe, shrink wrap*

* 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.

Ship Generator and Auxiliary Equipment

On May 9, 2017, Exide personnel and personnel from Castlerock Environmental, an Exide contractor, prepared the large electrical power generator and six pieces of auxiliary equipment (switch gear, transformers, motor controllers) for shipment to their Muncie, Indiana Plant. Equipment was prepared for shipment by being HEPA vacuumed, wet wiped, and shrink wrapped according to the procedures in the approved mitigation plan. The generator and auxiliary equipment are scheduled to be loaded and shipped on Thursday, May 11, 2017. Oversight activities conducted by Tetra Tech personnel included:

- The HEPA vacuum to be used was checked to determine if it had an active SCAQMD permit. The initial HEPA vacuum brought to the site for use had permit number G33413 issued to Castlerock but neither they nor Exide personnel were able to provide the activation number for this piece of equipment. Work was temporarily called off as they attempted to locate the activation number and due to a personnel issue between Exide and the Castlerock Supervisor. Approximately an hour later, work was re-scheduled to start later that morning with a different Castlerock Supervisor.
- When Castlerock personnel returned to the site to begin work again, it was discovered that the HEPA vacuum (permit G33413) had fallen over in transit and was damaged and unusable. It was decided that a different Castlerock owned HEPA vacuum that had been located at the Exide site since October of 2016 would be used. This HEPA vacuum had permit number G33388. Initially Exide and Castlerock staff provided to the Tetra Tech technician the number 569193 as the activation number, so work was allowed to be conducted. However, it was later discovered, after consultation with SCAQMD on May 11, 2017, that this number was the application number and not the permit activation number. SCAQMD notified Tetra Tech that although this HEPA vacuum had been onsite since the previous year, the notification for this piece of equipment had expired in 2016 and it was not currently activated. SCAQMD asked Tetra Tech personnel to ask to see paper proof of notification for future permit checks and not to accept a verbally given number.
- Observation of HEPA vacuuming (Permit G33388 vacuum), wet wiping, and shrink wrapping of six pieces of auxiliary equipment associated with the electrical power generator. Work was conducted by Exide and Castlerock personnel on the pavement outside the PAC Center/Materials Storage warehouse in the South Yard.

- Observation of movement of shrink wrapped auxiliary equipment into the PAC Center/Material Storage warehouse to temporarily store them out of the elements until the shipment date.
- Observation of HEPA vacuuming (permit G33388 vacuum), wet wiping, and shrink wrapping of large electrical power generator in the West Yard area by Castlerock personnel with assistance by Exide personnel. Paved area around generator was also HEPA vacuumed.
- Upwind and downwind dust monitoring was conducted by Tetra Tech using TSI DustTrak instruments. Instruments were first placed around the work area where the auxiliary equipment was prepared and then moved to the generator location in the West Yard. Monitoring activities did not identify fugitive dust being generated during the performance of the work activities.

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 work activities conducted.

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
EX-127 Ship Generator and Auxiliary Equipment	On-Schedule

WORK SCHEDULED DURING THE UPCOMING PERIOD:

The following activities are anticipated for the upcoming weeks:

Week	Anticipated Activities
May 11 – May 17	<ul style="list-style-type: none"> • Ship Generator and Auxiliary Equipment

Week	Anticipated Activities
May 18 – May 24	None

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 May 4, 2017 through May 10, 2017. Tetra Tech was on-site Thursday, May 4, 2017 to attend the weekly planning meeting. Tetra Tech personnel were also on-site Monday, May 8, 2017 to attend the weekly planning meeting and prepare for dust monitoring of EX-127 work, and again on Tuesday, May 9, 2017 to observe and monitor the EX-127 work activities.

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. Also attached are dust monitoring results and a map showing the dust monitoring locations.

Should you have questions regarding this report, or require additional information, please contact me at your earliest convenience.

Sincerely,



Greg Acosta, PE

Vice President, Environmental Services

ATTACHMENTS:

Gant Chart Schedule

Site Map

DustTrak Monitoring Data

Gant Chart Schedule

Site Map

Mitigation Project Map Layout

Week 04/27/17 – 05/18/17

Rev: 05/04/2017

4. RCRA RFI Soil Sampling

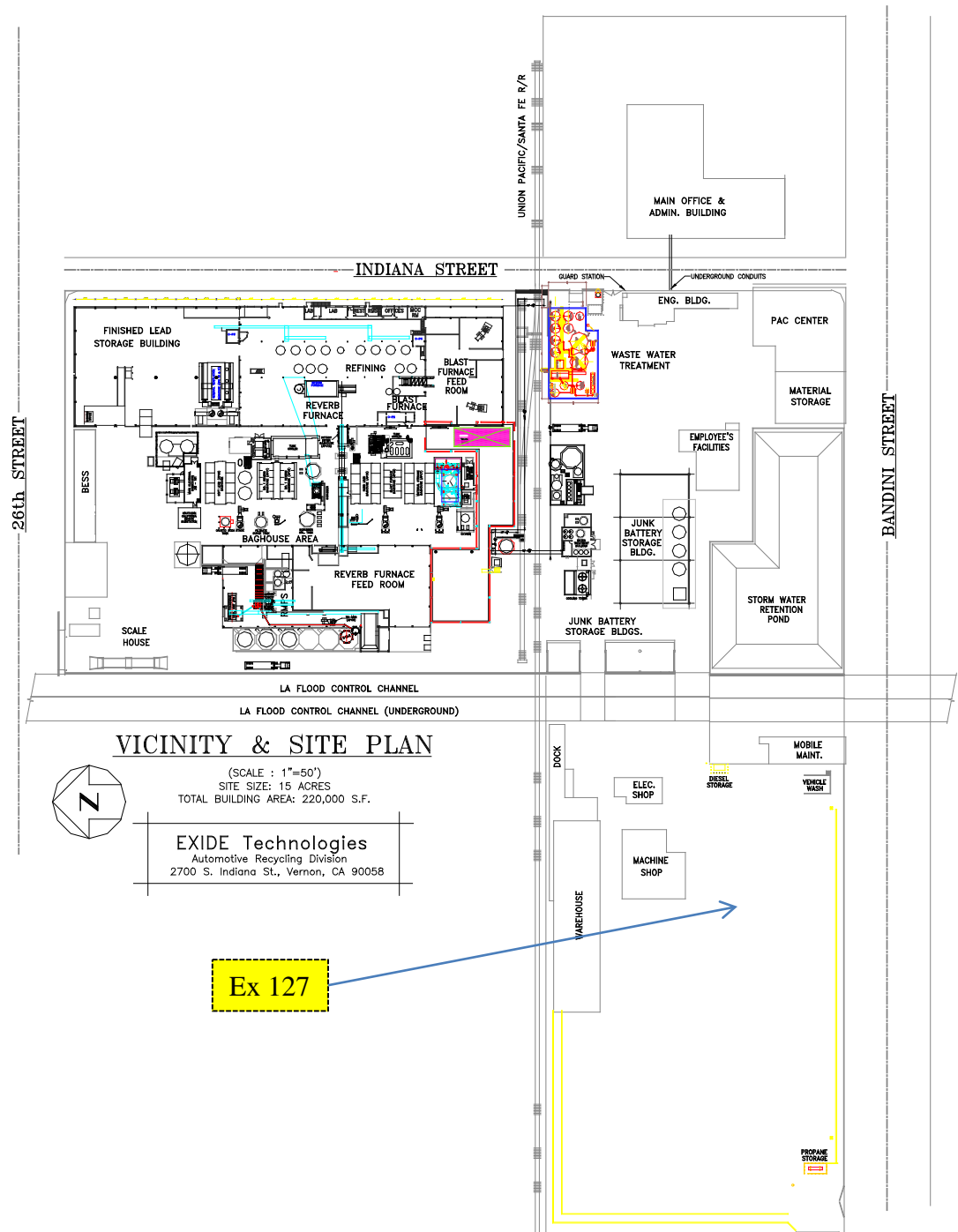
Ex 83. RFI Soil Sampling Supplemental

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 127 Ship Generator & Auxiliary Equipment



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

Monitoring Results / Reports
(Tuesday, May 9, 2017)

ACTIVITY	SERIAL NUMBER	LOCATION	TIME SPAN	TABLE NAME
Preparation of Auxiliary Equipment for Shipping				
EX 127 – Ship Generator and Auxiliary Equipment	8532162611	Southeast Warehouse-Upwind	6:56-8:26	Test 001
EX 127 – Ship Generator and Auxiliary Equipment	8530094305	South Warehouse-Downwind	6:59-8:14	Test 002
EX 127 – Ship Generator and Auxiliary Equipment	8532162611	Southeast Warehouse-Upwind	9:33-11:30	Test 002
EX 127 – Ship Generator and Auxiliary Equipment	8530094305	South Warehouse-Downwind	9:36-11:30	Test 003
EX 127 – Ship Generator and Auxiliary Equipment	8530094305*	South Warehouse-Upwind	11:30-12:36	Test 003
EX 127 – Ship Generator and Auxiliary Equipment	8532162611*	South Warehouse-Downwind	11:30-12:30	Test 002
Preparation of Generator for shipping				
EX 127 – Ship Generator and Auxiliary Equipment	8532162611	Generator(West Yard)-Upwind	13:20-14:20	Test 003
EX 127 – Ship Generator and Auxiliary Equipment	8530094305	Generator(West Yard)-Downwind	12:56-15:26	Test 004

*Note- Battery issues with instrument serial number 8532162611 caused the instruments to be changed from upwind to downwind monitoring usage in mid monitoring period so that more reliable instrument was used in downwind location



DATE: May 9, 2017
WORK ACTIVITY: EX-127 Ship
Generator and Auxiliary Equipment
WORK LOCATION: 1. South Yard
2. West Yard

Exide Technologies
2700 Indiana Street
Vernon, CA 90058

PLEASE LABEL ALL UPWIND AND
DOWNWIND MONITORING
LOCATIONS ALONG WITH WORK
AREAS BEING MONITORED.

Test 001

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/09/2017
Instrument S/N	8532162611	Start Time	06:41:45
		Stop Date	05/09/2017
		Stop Time	08:26:45
		Total Time	0:01:45:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/09/2017	06:56:45	0.044
2	05/09/2017	07:11:45	0.042
3	05/09/2017	07:26:45	0.043
4	05/09/2017	07:41:45	0.046
5	05/09/2017	07:56:45	0.046
6	05/09/2017	08:11:45	0.042
7	05/09/2017	08:26:45	0.040

Test 002

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/09/2017
Instrument S/N	8530094305	Start Time	06:44:35
		Stop Date	05/09/2017
		Stop Time	08:14:35
		Total Time	0:01:30:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/09/2017	06:59:35	0.037
2	05/09/2017	07:14:35	0.036
3	05/09/2017	07:29:35	0.037
4	05/09/2017	07:44:35	0.041
5	05/09/2017	07:59:35	0.041
6	05/09/2017	08:14:35	0.038

Test 002

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/09/2017
Instrument S/N	8532162611	Start Time	09:18:44
		Stop Date	05/09/2017
		Stop Time	12:29:44
		Total Time	0:03:11:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/09/2017	09:33:44	0.038
2	05/09/2017	09:48:44	0.036
3	05/09/2017	10:03:44	0.032
4	05/09/2017	10:18:44	0.028
5	05/09/2017	10:33:44	0.026
6	05/09/2017	10:48:44	0.025
7	05/09/2017	11:03:44	0.023
8	05/09/2017	11:18:44	0.022
9	05/09/2017	11:33:44	0.022
10	05/09/2017	11:51:47	0.000
11	05/09/2017	12:30:12	0.000

Test 003

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/09/2017
Instrument S/N	8530094305	Start Time	09:21:44
		Stop Date	05/09/2017
		Stop Time	12:36:44
		Total Time	0:03:15:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/09/2017	09:36:44	0.030
2	05/09/2017	09:51:44	0.030
3	05/09/2017	10:06:44	0.027
4	05/09/2017	10:21:44	0.026
5	05/09/2017	10:36:44	0.023
6	05/09/2017	10:51:44	0.022
7	05/09/2017	11:06:44	0.021
8	05/09/2017	11:21:44	0.020
9	05/09/2017	11:36:44	0.030
10	05/09/2017	11:51:44	0.020
11	05/09/2017	12:06:44	0.018
12	05/09/2017	12:21:44	0.018
13	05/09/2017	12:36:44	0.019

Test 003

ERROR: FLOW,

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/09/2017
Instrument S/N	8532162611	Start Time	13:05:07
		Stop Date	05/09/2017
		Stop Time	14:35:07
		Total Time	0:01:15:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/09/2017	13:20:07	0.030
2	05/09/2017	13:35:07	0.022
3	05/09/2017	13:50:07	0.018
4	05/09/2017	14:05:07	0.023
5	05/09/2017	14:15:08	0.000
6	05/09/2017	14:20:07	0.001

Test 004

Instrument		Data Properties	
Model	DustTrak II	Start Date	05/09/2017
Instrument S/N	8530094305	Start Time	12:41:35
		Stop Date	05/09/2017
		Stop Time	15:26:35
		Total Time	0:02:45:00
		Logging Interval	900 seconds

Test Data			
Data Point	Date	Time	AEROSOL mg/m ³
1	05/09/2017	12:56:35	0.020
2	05/09/2017	13:11:35	0.021
3	05/09/2017	13:26:35	0.020
4	05/09/2017	13:41:35	0.016
5	05/09/2017	13:56:35	0.014
6	05/09/2017	14:11:35	0.013
7	05/09/2017	14:26:35	0.013
8	05/09/2017	14:41:35	0.012
9	05/09/2017	14:56:35	0.011
10	05/09/2017	15:11:35	0.011
11	05/09/2017	15:26:35	0.014