

SOUTH COAST AQMD
CLERK OF THE BOARDS

March 28, 2017

CN: 15279

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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 FOR ABATEMENT CASE NO. 3151-32**
RE: WEEKLY STATUS REPORT # 131 (3/9/17 – 3/15/17)

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 March 9, 2017 through March 15, 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
EX 124	Remove New CEMS Unit	HEPA Vacuum and Shrink Wrap*
EX 125	Remove New Brick	HEPA Vacuum and Shrink Wrap*
EX 126	Repair Waste Water Treatment Plant Sand Filters	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 waste water treatment activities.

Remove New CEMS Unit

On March 15, 2017, Exide personnel prepared the new CEMS unit for shipment to their Munsee Indiana plant. Tetra Tech personnel verified that the HEPA vacuums used were permitted by SCAQMD for lead, and observed and documented the cleaning and shrink wrap process. Shipment of the CEMS unit is scheduled for March 16, 2017 (i.e. during the next reporting period) and Tetra Tech personnel will be onsite to observe and document shipping activities in accordance with the approved mitigation plan.

Remove New Brick

On March 15, 2017, Exide personnel prepared 15 pallets of new reverb furnace brick for shipment to their Munsee Indiana plant. Tetra Tech personnel verified that the HEPA vacuums used were permitted by SCAQMD for lead, and observed and documented the cleaning and shrink wrap process. Shipment of the new brick is scheduled for March 16, 2017 (i.e. during the next reporting period) and Tetra Tech personnel will be onsite to observe and document shipping activities in accordance with the approved mitigation plan.

Repair Waste Water Treatment Plant Sand Filters

On March 9, 2017, repair activities were conducted within the temporary enclosure that was constructed during the previous monitoring period. Tetra Tech personnel verified that the temporary enclosure was complete, maintained under negative pressure and vented to a permitted HEPA filtration system. Once the repairs were pressure tested, Castlerock mobilized to the site to remove the temporary enclosure. All activities for this mitigation plan were completed on March 9, 2017 in accordance with the approved mitigation plan.

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
Mar. 16 – Mar. 22	<ul style="list-style-type: none"> • Remove New CEMS Unit • Remove New Brick

Week	Anticipated Activities
Mar. 23 - Mar. 29	<ul style="list-style-type: none"> • None at this time

KEY MILESTONES:

The following key milestones were achieved during this reporting period:

- o Repair Waste Water Treatment Plant Sand Filters: COMPLETE
- o Remove New CEMS Unit: BEGAN
- o Remove New Brick: 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:

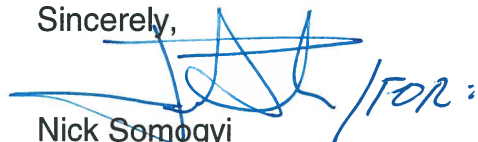
- o None at this time.

SUMMARY:

The summary provided herein covers the activities for the period of March 9, 2017 through March 15, 2017. Tetra Tech was on site Thursday, March 9, 2017 and Monday, March 13, 2017 for weekly meetings and on Thursday, March 9, 2017 and Wednesday, March 15, 2017 to observe work related to the Repair of the Waste Water Treatment Plant Sand Filters, Removal of the CEMS Unit and Removal of New Brick. 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 Data Forms

Gant Chart Schedule

Project Schedule

Week of 03/09/17 – 03/30/17

Rev: 3/16/2017



Recycling Division, Vernon, CA

Mitigation Plan Risks	Task Name	Plant Location	Duration	Start Date	Finish Date	%	3/5/2017							03/12/17							03/19/17							03/26/17						
							09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30						
Ex 72	Cleaning of Assorted Materials in Total Enclosure	Total Enclosure	893 days	1/20/14	05/01/17	80%																												
Ex 76	Various Work Methods in Total Enclosure	Total Enclosure	892 days	1/22/14	05/01/17	80%																												
4	RCRA RFI Soil Sampling	General	13 days	1/07/16	05/01/17	97%																												
Ex 83	RFI Soil Sampling Supplemental	General	13 days	1/07/16	05/01/17	97%																												
Ex 115	Sediment Removal from EQ Tanks	WWTP	-	3/7/16	05/01/17	50%																												
Ex 126	Repair Waste Water Treatment Plant Sand Filter	WWTP	2 days	3/8/17	03/09/17	100%																												
EX 124	Remove New CEMS Unit	Blue Lead Warehouse & Pac Center	2 days	3/15/17	03/16/17	100%																												
EX 125	Remove New Brick	Pac Center	2 days	3/15/17	03/16/17	100%																												

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

Site Map



Mitigation Project Map Layout

Week 03/09/17 – 03/30/17

Rev: 03/16/2017

4. RCRA RFI Soil Sampling

Ex 83. RFI Soil Sampling Supplemental

Ex 72. Cleaning of Assorted Materials in Total Encl.

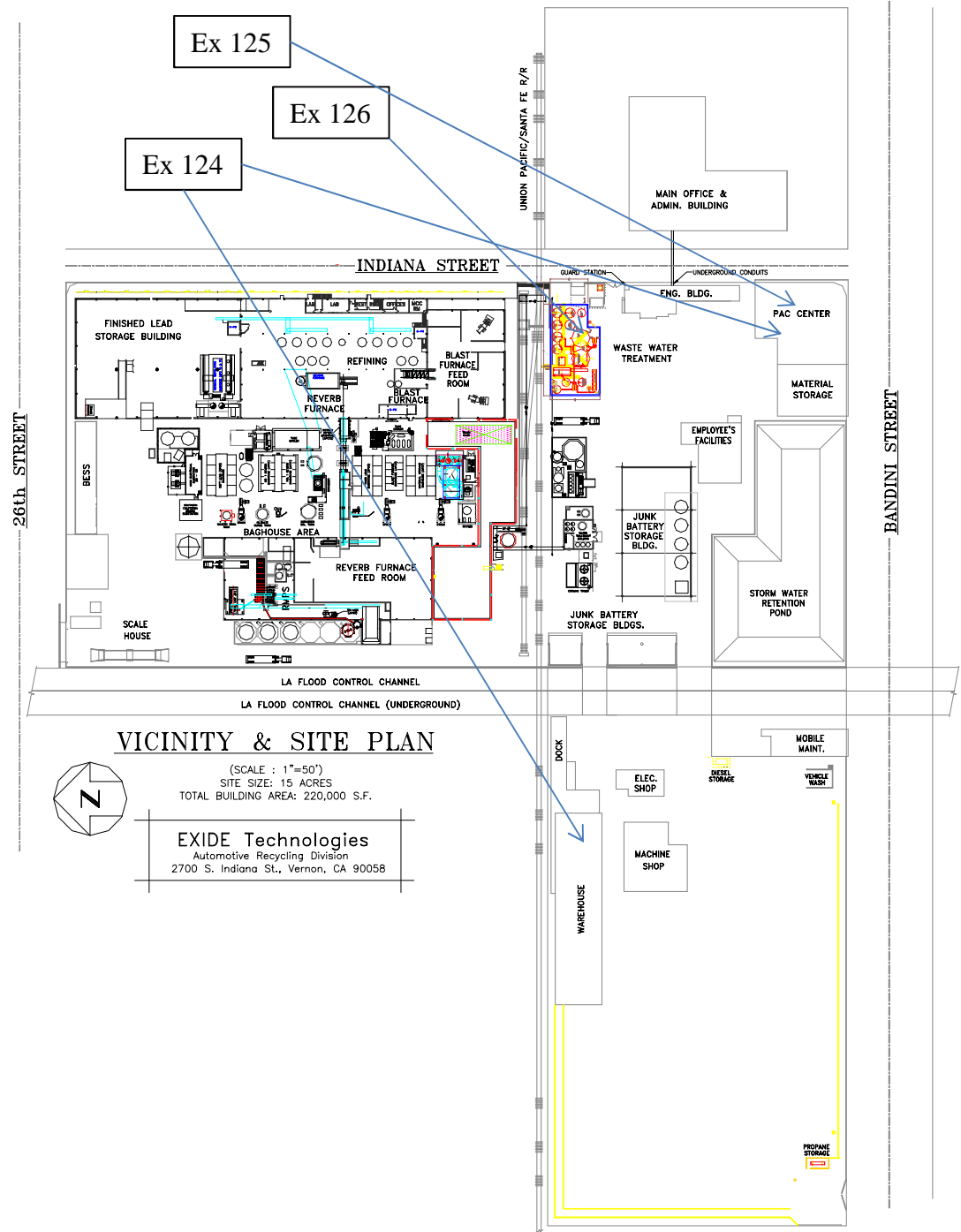
Ex 76. Various Work Methods in Total Enclosure

Ex 115. Sediment Removal from EQ Tanks

Ex 126 Repair WWTP Sand Filter

Ex 124 Remove New CEMS Unit

Ex 125 Remove New Brick



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_03/16/2017pptx

Monitoring Results / Reports
(Thursday, March 9, 2017)

ACTIVITY	SERIAL NUMBER	LOCATION
EX 126 – WWTP Sand Filter Repairs	8533130908	Upwind
EX 126 – WWTP Sand Filter Repairs	8533103901	Downwind



Exide Technologies
2700 Indiana Street
Vernon, CA 90058

3/9/2017 EX-126

Test 002

Instrument		Data Properties	
Model	DustTrak DRX	Start Date	03/09/2017
Instrument S/N	8533130908	Start Time	05:59:55
		Stop Date	03/09/2017
		Stop Time	11:29:55
		Total Time	0:05:30:00
		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	03/09/2017	06:14:55	0.011	0.012	0.012	0.013	0.017
2	03/09/2017	06:29:55	0.001	0.001	0.001	0.001	0.001
3	03/09/2017	06:44:55	0.020	0.021	0.022	0.026	0.028
4	03/09/2017	06:59:55	0.021	0.021	0.022	0.023	0.024
5	03/09/2017	07:14:55	0.030	0.031	0.032	0.036	0.037
6	03/09/2017	07:29:55	0.024	0.025	0.027	0.029	0.030
7	03/09/2017	07:44:55	0.026	0.027	0.027	0.029	0.029
8	03/09/2017	07:59:55	0.020	0.020	0.021	0.022	0.023
9	03/09/2017	08:14:55	0.019	0.020	0.021	0.022	0.022
10	03/09/2017	08:29:55	0.023	0.023	0.024	0.026	0.026
11	03/09/2017	08:44:55	0.016	0.017	0.018	0.019	0.019
12	03/09/2017	08:59:55	0.015	0.016	0.016	0.018	0.018
13	03/09/2017	09:14:55	0.018	0.018	0.019	0.020	0.020
14	03/09/2017	09:29:55	0.023	0.024	0.024	0.025	0.026
15	03/09/2017	09:44:55	0.023	0.023	0.024	0.025	0.026
16	03/09/2017	09:59:55	0.027	0.027	0.028	0.030	0.030
17	03/09/2017	10:14:55	0.027	0.028	0.029	0.030	0.031
18	03/09/2017	10:29:55	0.027	0.028	0.029	0.030	0.031
19	03/09/2017	10:44:55	0.023	0.023	0.024	0.025	0.026
20	03/09/2017	10:59:55	0.022	0.022	0.023	0.024	0.025
21	03/09/2017	11:14:55	0.023	0.023	0.024	0.025	0.026
22	03/09/2017	11:29:55	0.023	0.024	0.024	0.026	0.026

Test 003

Instrument		Data Properties	
Model	DustTrak DRX	Start Date	03/09/2017
Instrument S/N	8533103901	Start Time	05:52:00
		Stop Date	03/09/2017
		Stop Time	11:22:00
		Total Time	0:05:30:00
		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	03/09/2017	06:07:00	0.028	0.028	0.028	0.029	0.029
2	03/09/2017	06:22:00	0.027	0.028	0.028	0.028	0.029
3	03/09/2017	06:37:00	0.027	0.027	0.028	0.030	0.030
4	03/09/2017	06:52:00	0.024	0.024	0.025	0.025	0.025
5	03/09/2017	07:07:00	0.029	0.030	0.030	0.031	0.031
6	03/09/2017	07:22:00	0.027	0.028	0.029	0.030	0.030
7	03/09/2017	07:37:00	0.027	0.027	0.027	0.028	0.028
8	03/09/2017	07:52:00	0.023	0.023	0.024	0.025	0.025
9	03/09/2017	08:07:00	0.021	0.021	0.022	0.022	0.022
10	03/09/2017	08:22:00	0.026	0.026	0.027	0.027	0.027
11	03/09/2017	08:37:00	0.021	0.021	0.022	0.022	0.022
12	03/09/2017	08:52:00	0.017	0.018	0.018	0.019	0.019
13	03/09/2017	09:07:00	0.019	0.020	0.020	0.020	0.020
14	03/09/2017	09:22:00	0.024	0.024	0.025	0.025	0.025
15	03/09/2017	09:37:00	0.026	0.027	0.027	0.027	0.027
16	03/09/2017	09:52:00	0.029	0.029	0.030	0.030	0.031
17	03/09/2017	10:07:00	0.027	0.027	0.028	0.028	0.029
18	03/09/2017	10:22:00	0.026	0.026	0.027	0.027	0.027
19	03/09/2017	10:37:00	0.018	0.019	0.019	0.019	0.020
20	03/09/2017	10:52:00	0.015	0.015	0.015	0.016	0.016
21	03/09/2017	11:07:00	0.014	0.014	0.015	0.015	0.015
22	03/09/2017	11:22:00	0.013	0.013	0.013	0.014	0.014

Monitoring Results / Reports
(Wednesday, March 15, 2017)

ACTIVITY	SERIAL NUMBER	LOCATION
EX 125 – Remove New Brick	8533103901	Upwind
EX 125 – Remove New Brick	8533130908	Downwind



Exide Technologies
2700 Indiana Street
Vernon, CA 90058

3/15/2017 EX-124 & EX-125

Test 003

Instrument		Data Properties	
Model	DustTrak DRX	Start Date	03/15/2017
Instrument S/N	8533130908	Start Time	08:26:26
		Stop Date	03/15/2017
		Stop Time	10:56:26
		Total Time	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	03/15/2017	08:41:26	0.123	0.125	0.126	0.130	0.132
2	03/15/2017	08:56:26	0.102	0.103	0.104	0.107	0.109
3	03/15/2017	09:11:26	0.119	0.120	0.121	0.126	0.127
4	03/15/2017	09:26:26	0.121	0.122	0.123	0.128	0.129
5	03/15/2017	09:41:26	0.111	0.113	0.114	0.120	0.122
6	03/15/2017	09:56:26	0.116	0.118	0.119	0.125	0.127
7	03/15/2017	10:11:26	0.116	0.118	0.120	0.126	0.128
8	03/15/2017	10:26:26	0.107	0.108	0.110	0.116	0.118
9	03/15/2017	10:41:26	0.111	0.113	0.116	0.124	0.126
10	03/15/2017	10:56:26	0.131	0.133	0.135	0.143	0.146

Test 004

Instrument		Data Properties	
Model	DustTrak DRX	Start Date	03/15/2017
Instrument S/N	8533103901	Start Time	08:20:43
		Stop Date	03/15/2017
		Stop Time	11:05:43
		Total Time	0:02:45:00
		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	03/15/2017	08:35:43	0.117	0.118	0.118	0.119	0.120
2	03/15/2017	08:50:43	0.093	0.093	0.094	0.094	0.094
3	03/15/2017	09:05:43	0.105	0.106	0.106	0.107	0.107
4	03/15/2017	09:20:43	0.118	0.119	0.120	0.121	0.121
5	03/15/2017	09:35:43	0.106	0.107	0.107	0.108	0.108
6	03/15/2017	09:50:43	0.120	0.120	0.121	0.122	0.122
7	03/15/2017	10:05:43	0.112	0.113	0.113	0.114	0.115
8	03/15/2017	10:20:43	0.106	0.106	0.107	0.108	0.109
9	03/15/2017	10:35:43	0.096	0.097	0.098	0.099	0.099
10	03/15/2017	10:50:43	0.130	0.131	0.132	0.133	0.134
11	03/15/2017	11:05:43	0.133	0.134	0.135	0.136	0.136