



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

March 1, 2013

Fred Ganster  
Exide Technologies  
2700 S Indiana St  
Vernon CA 90058

Dear Mr. Ganster:

Subject: AB2588 Public Notification and Rule 1402 Risk Reduction  
for **Exide Technologies, Vernon**, SCAQMD Facility No. **124838**

Pursuant to the Air Toxic "Hot Spots" Information and Assessment Act (AB2588), the revised health risk assessment (HRA) submitted by Exide Technologies, Vernon (Exide) in January 2013 has been reviewed by the South Coast Air Quality Management District (SCAQMD). The Office of Environmental Health Hazard Assessment (OEHHA) has reviewed the previous draft of the HRA and their comments have been incorporated. SCAQMD staff hereby approves the revised HRA. This revised HRA will require public notice and risk reduction by Exide.

This 2013 HRA is hereby approved pursuant to California Health and Safety Code (H&SC) Section 44362(a). The SCAQMD approved 2013 HRA indicates that your facility poses a maximum individual cancer risk (MICR) of 156 in one million (primarily from arsenic) at a worker receptor (receptor #1005) about 300 meters northeast and a cancer burden of 10. The HRA inappropriately used a fence line receptor as the maximum worker receptor for chronic exposure. Using the next highest, non-facility, non-fence receptor, SCAQMD has used receptor #1005 as the maximum exposed individual worker (MEIW). While arsenic monitoring data suggests that the HRA model may be significantly overestimating the risk at this particular MEIW receptor, monitoring results support the model's estimates of cancer burden and risk at other more distant receptors.

The maximum chronic hazard index (HI) is 63 for the respiratory system (from arsenic) at the same worker receptor (receptor #1005). The maximum acute HI is 3.8 for the developmental system (from arsenic) along the eastern fence line (receptor #57). And at the residential receptor (receptor #1016, about 1,400 meters north), the MICR is 22 in one million and the maximum chronic HI is 2.9.

The MICR of 156 in one million far exceeds the AB2588 Public Notice MICR threshold of 10 in one million. The maximum chronic HI of 63 and the maximum acute HI of 3.8

*Cleaning the air that we breathe.*

also greatly exceed the AB2588 Public Notice HI threshold of 1.0. Based on the MICR and HI, Exide is required to notify the exposed public within thirty (30) days from the receipt of this letter. Please provide us with verification that the entire package (public notice and fact sheet) was mailed to the entire exposed public.

The MICR of 156 in one million, the cancer burden of 10, the maximum chronic HI of 63, and the maximum acute HI of 3.8 exceed SCAQMD Rule 1402 (R1402) Action Risk Levels (MICR of 25 in one million, cancer burden of 0.5, or hazard indices of 3). Based on either the MICR, cancer burden, or HIs, Exide is subject to R1402 and Risk Reduction (facility risks below R1402 Action Risk Levels). Risk Reduction (including R1402 compliance demonstration: source test and HRA) must be completed as quickly as feasible but no later than three (3) years from the initial risk reduction plan (RRP) submittal date, pursuant to Rule 1402(e)(1). Pursuant to R1402(f)(2), Exide is required to submit a risk reduction plan within one hundred eighty (180) days from the date of this letter. We strongly encourage that the Plan submittal and any risk reduction steps be expedited given the high risk levels associated with your facility. One element of the risk reduction plan is a schedule for project completion (see Attachment 4). Given the high health risk levels, SCAQMD staff will work with you to accelerate the project schedule, including expedited permitting and review, to the extent technically feasible. In order to achieve the desired risk reductions quickly and with a high probability of success, we strongly encourage that Exide address the design, operation, maintenance, and condition of your basic processes and associated existing control systems to lower emissions rates and help optimize additional control technology. Staff also strongly encourages the use of available and proven technologies, such as wet electrostatic precipitators.

The MICR of 156 in one million and the maximum chronic HI of 63 exceed the R1402 Significant Risk Levels (MICR of 100 in one million or hazard indices of 5). Please be advised that based on either the MICR or chronic HI, Exide is not eligible for time extensions, pursuant to R1402(e)(2).

Pursuant to R1402(p), Exide is required to provide annual public notice until the R1402 Action Risk Levels are met. Pursuant to R1402(h), Exide is required to submit annual progress reports until the R1402 Action Risk Levels are met.

Please contact Pierre Sycip at (909) 396-3095 (email: [psycip@aqmd.gov](mailto:psycip@aqmd.gov)) to arrange a meeting with SCAQMD as soon as possible to discuss public notification, the content and prompt scheduling of a community meeting, and SCAQMD assistance. At this meeting, we will provide a map containing the notification area (isopleth map), an English and Spanish version of a public notification and information sheet, corresponding envelopes, and a transmittal letter for the final HRA that goes to the local library.

I have enclosed our Public Notification Procedures, which provide important information on the notification process. To facilitate this process, please provide the items listed in Attachment 1 to Pierre Sycip (SCAQMD) by March 19, 2013.

If you need more information, please contact me at (909) 396-2239 (email: pfine@aqmd.gov).

Sincerely,

//Original signed by//

Philip M. Fine, Ph.D.  
Planning & Rules Manager

Certified Mail and Return Receipt

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Attachments: Public Notification Procedures  
Attachment 1 - Public Notification Checklist  
Attachment 2 - Model Agenda for Community Meeting  
Attachment 3 - Rule 1402  
Attachment 4 - Elements of a Risk Reduction Plan

**NOTE: There are 5 attachments**

Cc: Ed Mopas  
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Vernon CA 90058

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