

February 11, 2016

Mr. Wayne Lorentzen  
California Dept. of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, CA 95826-3200

RE: Request to Remove Sediment from Equalization Tanks  
Exide Technologies, Vernon, CA

Dear Mr. Lorentzen:

Exide Technologies seeks permission to conduct necessary maintenance on the Facility's wastewater treatment plant (WWTP). In order to maintain good environmental practice, Exide seeks permission to remove sediment from Unit 52 (Equalization Tank No. 1) and Unit 53 (Equalization Tank No. 2) and ship the accumulated sediment offsite for disposal at US Ecology in Beatty, Nevada. In accordance with DTSC's May 7, 2015 letter, hazardous waste activity or operations prior to DTSC's decision on the revised Closure Plan is subject to DTSC approval.

As required by DTSC's May 7, 2015 letter, we submit the following information for your consideration:

(1) The activity or operation to be undertaken

The on-site WWTP at the Exide Facility in Vernon, California requires maintenance consisting of the removal and off-site disposal of accumulated sediment in Units 52 and 53 (Equalization Tanks Nos. 1 and 2, respectively). The sediment will be removed from the Equalization Tanks using vacuum trucks, containerized at the work area if needed, sampled for characterization purposes as required by the anticipated disposal facility, and then sent for off-site disposal following appropriate shipping and transportation requirements as dictated by the results of the characterization sampling. Removal activities are expected to require approximately 2 weeks to complete.

Real-time air monitoring will be conducted by Tetra Tech using DustTrak monitors upwind and downwind of the work area. Work will stop if downwind dust concentrations become elevated above the upwind monitors.

Work will not be conducted if sustained wind speeds are 10 mph or greater. Wind speeds will be measured at the work area and recorded hourly.

As described above, sediment removal will be performed in a manner designed to eliminate or minimize spilling, tracking or creation of dust. While not expected to occur, any sediment that is not contained will be immediately removed. If the amount of uncontained sediment is small, it will be removed with a SCAQMD-permitted HEPA vacuum. If larger amounts of sediment need removal, a shovel or similar tool will be used, and the area will be vacuumed with a SCAQMD-permitted HEPA vacuum.

(2) Why the activity/operations must be undertaken prior to DTSC's decision on the revised Closure Plan

The on-site WWTP is used by Exide for treatment of stormwater and daily wash down water, and will continue to be used during facility closure to treat decontamination water. In order for the on-site WWTP to function properly, the accumulated sediment must be removed from the Equalization Tanks. Major rain events are expected and sediment removal is necessary to provide the operating capacity needed to treat the expected stormwater. If not emptied, the Equalization Tanks will no longer be able to function as designed.

(3) Why the activity/operation is necessary to protect human health and the environment

The removal and off-site disposal of the sediment in the Equalization Tanks does not pose a threat to human health nor the environment because failure to do so may prevent the on-site WWTP from operating properly and could result in discharge water which does not meet the discharge standards in the Los Angeles County Sanitation District discharge permit. As a result, Exide could be in violation of its discharge permit. In addition, significant rains are forecasted for the near future, and proper treatment of the stormwater will be best accomplished with a WWTP that has maximum operating capacity. As noted above, this activity is necessary maintenance and approval prior to Closure Plan approval would be beneficial for human health and the environment because the tanks are filling quickly and Exide seeks to empty them in order to continue to maintain good operating practices.

We appreciate your prompt review of our request. If you have any questions, please contact John Hogarth at (323) 262 1101 x 275.

Sincerely,

A handwritten signature in black ink, appearing to read "J. S. Hogarth", is written over a horizontal line. The signature is stylized and includes a flourish at the end.

John S. Hogarth  
Plant Manager

EXIDE TECHNOLOGIES

Cc: S. Patel  
T. Strang  
D. Henke  
N. Serieys  
J. DiJoseph  
P. Stratman