



Department of
Toxic Substances
Control

*Preventing
environmental
damage from
hazardous waste,
and restoring
contaminated
sites for all
Californians.*



State of California



California
Environmental
Protection Agency

Fact Sheet, June 2006

Draft Permit and Draft Environmental Impact Report for Exide Technologies

2700 South Indiana Street, Vernon



You are invited to comment on a draft Hazardous Waste Management Facility Permit (Permit), and the draft Environmental Impact Report (EIR) for Exide Technologies (Exide). Exide is a Hazardous Waste Management Facility located in the City of Vernon. They have requested to continue operations under a RCRA-equivalent permit. Their application is currently under review by the California Department of Toxic Substances Control (DTSC). This fact sheet provides a brief summary of:

- Facility Description and History
- Why a Permit is Necessary
- What is being Proposed in the Draft Permit
- The California Environmental Quality Act (CEQA)
- Health Risk Assessment Results
- Resource Conservation and Recovery Act (RCRA)
- Enforcement History
- Corrective Action Program
- Your Opportunities for Public Involvement

Detailed information on the above is available within supporting documents available at the locations listed under "Where to Find Documents."

YOUR OPPORTUNITY TO COMMENT ON THE DRAFT PERMIT & DRAFT EIR

The sixty (60) day public comment period starts on June 30 and ends on August 29, 2006. During this comment period, interested parties may submit written comments on the draft EIR and Draft Permit to DTSC's Project Manager, 1011 North Grandview Ave, Glendale, CA 91201.

A Community Meeting will be held on July 20, 2006 at 7:00 p.m. at the Huntington Park High School Cafeteria, 6020 Miles Avenue, Huntington Park, California, to provide answers to your questions.

A Public Hearing, specifically to accept your verbal and written comments, will be held on August 9, 2006 at 7:00 p.m. at the Huntington Park High School Cafeteria, 6020 Miles Avenue, Huntington Park, California.

FACILITY DESCRIPTION AND HISTORY

Exide Technologies is located in the city of Vernon, on approximately 24 acres of land. The parcel is zoned for heavy Industrial (Zone M-2) and other parcels in the vicinity are zoned either Manufacturing or Commercial. There is no residential zoning within a quarter mile radius of the site (see Figure 1).



EXPLANATION

- | | |
|---------------------------------------|---|
| ① Huntington Park High School | ④ Huntington Park Public Library |
| ② Vernon City Hall | ⑤ City of Commerce Central Library |
| ③ Maywood Cesar Chavez Public Library | ⑥ Robert Louis Stevenson Public Library |

The facility has been used for a variety of metal fabrication and metal recovery operations since 1922. Previous owners include Morris P. Kirk & Sons Inc., Gould Inc. (Gould), and GNB, Inc. The primary use has been lead-acid battery recycling since the late 1970s.

The facility receives spent (used) lead-acid batteries and other lead-bearing materials and recycles them by recovering lead and polypropylene. The sulfuric acid from the batteries is treated also recycled by use in the facility's wastewater treatment system and the treated liquid is discharged into the sewer.

The facility has an average production of 100,000 to 120,000 tons of lead per year. This is equivalent to recycling approximately 11 million automotive batteries, which is about the same number of spent batteries that are generated in California annually. The facility also recycles lead-bearing plant scrap and other lead-bearing materials.

WHY A PERMIT IS NECESSARY

In order for DTSC to effectively regulate the activities at facilities, a permit is necessary. Permits are developed after detailed DTSC's technical review, and are intended to ensure that the facility operates in a manner that protects human health and the environment.

The Draft Permit prepared for Exide includes general and specific requirements for operation of the facility. These requirements include:

- waste analysis;
- operations inspection and recording;
- security;
- closure procedures with financial responsibility;
- contingency planning and emergency response procedures;
- personnel training programs; and,
- health and safety programs.

DTSC conducted a detailed review of the Exide Technologies Part B Permit application and has determined that it complies with all applicable regulatory standards and requirements.

At the close of the 60-day public comment period, DTSC will make a determination on this Permit after all comments have been received, evaluated and considered.

WHAT IS BEING PROPOSED IN THE DRAFT PERMIT

The proposed Permit, if approved, would allow the facility to continue current operations in 77 hazardous waste management units which include:

1. Receiving lead-acid batteries and other lead bearing materials via truck and rail to recover lead and polypropylene
2. Utilizing tanks to manage the spent waste acid that is separated from the lead bearing components for recovery
3. Separating spent lead-acid battery components in the Raw Material Preparation System (RMPS), pumping liquid from the RMPS along with lead sulfate paste to three above ground tanks where soda ash is added to produce feed for the smelting furnace
4. Separating grid metal from rubber chips/polypropylene. Polypropylene is shipped off-site for recycling into battery casings and other plastic products
5. Using two furnaces (reverberatory and blast) to produce lead ingots (bricks)
6. Using a hazardous waste water treatment system to treat the spent sulfuric acid waste, waste water generated on-site, and storm water collected on site.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

As required by the California Environmental Quality Act (CEQA), DTSC completed an environmental impact evaluation called a draft Environmental Impact Report (EIR). The proposed project was concluded to have a potentially significant adverse air quality impact because PM10 (very fine particulate matter, under 10 microns in size) and off-site NOx emissions (nitrogen oxides, primarily related to trucks) exceeded the South Coast Air Quality

Management District's significance threshold for new sources. Note, that the Facility is not a new source and that all other emissions were determined to be less than significant. The impacts of the facility on all other environmental resources were also determined to be less than significant. The draft EIR and supporting documents are available at the locations listed under "Where to Find Documents."

HEALTH RISK ASSESSMENT RESULTS

As part of the environmental impact evaluation of the facility, a Health Risk Assessment was prepared. The risk assessment evaluated potential cancer and non-cancer health effects that could be caused by the facility's operations. The assessment took into account a variety of factors, including the types and maximum amounts of waste that would be stored and handled at the facility, and all the possible ways people could be exposed (through breathing the air emissions, coming into contact with the soil surrounding the facility, and similar activities). For cancer, the potential effects from the facility are well within health risk limits. For non-cancer health risks, the risk assessment evaluated chronic and acute health effects for both the nearby residents and facility workers. The assessment concluded that non-cancer health risks are also well within the state established limits.

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

A RCRA Permit (42 U.S.C. Section 6901 et seq.), is required for the storage, treatment, and disposal of hazardous wastes, and corrective action for the releases of hazardous wastes / substances found at the facility. On August 1, 1992, DTSC received RCRA final authorization from the U.S. EPA to implement the State Hazardous Waste Management Program (HWMP) in lieu of the federal RCRA program. Therefore, a Permit issued by DTSC is considered a RCRA-equivalent Permit.

On August 8, 1980, Gould (former owner) filed a RCRA Part A application with the U.S. EPA. On December 18, 1981, an Interim Status Document (ISD) to store and treat hazardous wastes at the existing hazardous waste management areas was issued to Gould. On November 8, 1988, GNB Inc. (name changed to Exide in 2001) submitted a RCRA Part B application. Revisions to the Part B Application were submitted over the ensuing years with the latest being on April 17, 2006 and supplemental information on May 2, 2006.

ENFORCEMENT HISTORY

Over the years there have been various enforcement actions at this facility by the Department of Health Services (DTSC's predecessor agency), and DTSC. The following information provides examples and is not a comprehensive list. Documentation supporting

the enforcement history is available only at the DTSC Regional Records Office in Glendale.

- On May 7, 1987, DHS sampled an unpermitted waste pile and found high levels of lead and antimony
- On March 5, 1997, GNB entered into Consent Agreement and Stipulation for entry of Final Judgment (Order No. BC 160942) which required implementation of Supplemental Environmental Projects including the addition of a Drop-out Box, Truck Wash Sump and Corridor Project. In addition, GNB replaced and consolidated the wastewater treatment tank system and provided secondary containment.
- On May 10, 2005, a draft Enforcement Order was sent to Exide regarding a modification of their wastewater treatment plant.
- The 2006 annual inspection has yielded some violations which are currently the subject of proposed enforcement action.

CORRECTIVE ACTION PROGRAM

California Health and Safety Code (H&SC) section 25200.10, requires Exide and other owners and/or operators of the hazardous waste management facility to take corrective action for all releases of hazardous waste or constituents from a solid waste management unit (SWMU) or a hazardous waste management unit at the facility.

If DTSC determines that the release of any hazardous waste from the facility or site may present a substantial hazard to human health or the environment, H&SC section 25187.1 authorizes DTSC to issue an order that requires the facility to monitor, test, analyze, and report what DTSC deems reasonable to ascertain the nature and extent of the hazard.

On February 25, 2002, Exide entered into an agreement with DTSC to implement a corrective action program at the Vernon Facility under Corrective Action Consent Order (CACO), Docket No.: P3-01/02-010. Exide agreed to perform any and all work undertaken pursuant to the consent order i.e. RCRA Facility Investigation (RFI) Work Plan, Interim Measures Work Plan, Corrective Measures Study Work Plan, Corrective Measures Implementation Work Plan, and any other DTSC-approved Work Plans. The consent order identified thirty-eight (38) solid waste management units (SWMUs) and thirty-four (34) areas of concern (AOCs) that needed to be addressed.

In 1994, DTSC required Exide to conduct an *RFI investigation at the Open Drainage Channel* and perform emergency measures to clean up the channel by removing the remaining lead contaminated sediments and pave/cover the soil and slag on the channel bank.

In 1995, Exide was required to perform RFI - Phase II work in the vadose (area between land surface and the water table) zone.

A report, called *Phase 2 RCRA Facility Investigation*, has been received and is under review. In the future, the community will be provided an opportunity to review and comment on the corrective action activity.

PUBLIC INVOLVEMENT

DTSC encourages public participation in the decision-making process, and appreciates suggestions regarding community outreach.

During the 60-day public comment period, interested parties may review the full Administrative Record of the Exide Facility, including the facility's environmental compliance record, during regular office hours at the DTSC Regional Office in Glendale. Additionally, draft documents are available for review at the locations listed under "Where to Find Documents."

DTSC will consider all comments received prior to making a final permit decision. All those who comment on the draft permit and provide an address will be notified of the final decision. The Public Information Repositories will contain a record of the decision, comments received, and a DTSC response to comments received.

WHERE TO FIND DOCUMENTS

DTSC encourages interested individuals to review more detailed information about the facility. The complete Administrative Record for the Exide Facility may be viewed at:

DTSC Regional Records
1011 N. Grandview Avenue
Glendale, CA 91201
(818) 551-2886
Please call Jone Barrio for appointment
Hours: Monday to Friday: 8:00 am – 5:00 p.m.

For more information about DTSC, Please visit our website at : www.dtsc.ca.gov

Copies of the draft permit and other project documents are located in the public information repositories at the following location:

Vernon City Hall
Finance Counter
4305 Santa Fe Avenue, 2nd Floor
Vernon, CA 90085
Phone: (323) 583-8811
Hours: Monday – Thursday 7:00 am – 5:30 p.m.

City of Los Angeles
Maywood Cesar Chavez Public Library
4323 E. Slauson Avenue
Maywood, CA 90270
Phone: (323) 771-8600
Hours: Monday/Tuesday 12:00 am – 8:00 p.m.
Wednesday/Thursday 11:00 am – 5:00 p.m.

Huntington Park Public Library
6518 Miles Avenue
Huntington Park, CA 90255
Phone: (323) 583-1461
Hours: Monday/Tuesday 1:00 p.m. – 8:00 p.m.
Wednesday/Thursday 11:00 am – 6:00 p.m.
Saturday 10:00 am – 5:00 p.m.
Closed Friday and Sunday

City of Commerce Central Libraty
5655 Jillson Street
Commerce, CA 90040
Phone: (323) 722-6660
Hours: Monday – Thursday 10:00 am – 8: p.m.
Friday 10:00 am – 2:00 p.m.
Saturday 10:00 am – 2:00 p.m.
Closed Sunday

Robert Louis Stevenson
Los Angeles Public Library
803 Spence Street
Los Angeles, CA 90023
Phone: (323) 268-4710
Hours: Monday/Wednesday 12:30 Pm.m – 8:00 p.m.
Tuesday/Saturday 10:00 am – 5:30 p.m.
Thursday/Friday 12:30 p.m. – 5:30 p.m.
Closed Sunday

FOR MORE INFORMATION

If you would like more information, or if you have questions, please write or call:

Mr. Liang Chiang, P.E.
Project Manager
Southern California Permitting & Corrective Action Branch
1011 N. Grandview Avenue
Glendale, CA 91201
(818) 551-2964
lchiang@dtsc.ca.gov

Ms. Maya Akula
Public Participation Specialist
Department of Toxic Substances Control
1011 N. Grandview Avenue
Glendale, CA 91201
(818) 551-2917
Toll Free: 1-866-495-5651
Makula@dtsc.ca.gov

Notice to hearing impaired:

You can obtain additional information by using the California State Relay Service by calling (888) 877-5378 (TDD). Ask them to contact: Ms. Maya Akula at (818) 551-2917 regarding the Exie facility.

Meeting Accessibility:

For information on accessibility and to request reasonable accommodation, please call Ms. Maya Akula at (818) 551-2917 at least one week in advance of the meeting.

COMMENT FORM AND MAILING COUPON

EXIDE TECHNOLOGIES.

VERNON, CALIFORNIA

DRAFT PERMIT

You may use this form to:

- **send us your comments**
- **be added to or taken off the mailing list**

All written comments must be postmarked no later than August 29, 2006. Please include your name and address if you wish to receive a copy of the written Response to Comment. Please send your comments to:

Liang Chiang, Project Manager
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, CA 91201

You may also e-mail this same information by August 29, 2006 to: LChiang@dtsc.ca.gov

Please take me off the mailing list

Please add me to the mailing list

Name: _____

Address: _____

Affiliation (if any): _____

Phone number (optional): _____

Comments: (If you need more space, please feel free to use another sheet of paper)

Did you find the information contained in this fact sheet useful? Yes No

Please explain: _____

DTSC mailing lists are only used only for keeping you informed of our activities. However, they are considered public records and, if requested, may be subject to release.