



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Edmund G. Brown Jr.
Governor

February 11, 2015

Mr. Thomas Strang, V.P.
Exide Technologies
Environmental Health & Safety – Americas
Building 200
13000 Deerfield Parkway
Milton, Georgia 30004

RESPONSE TO REVERB FURNACE FEED ROOM LETTER
DATED JANUARY 30, 2015, EXIDE TECHNOLOGIES, VERNON, CALIFORNIA;
EPA ID. NO. CAD097854541

Dear Mr. Strang:

The Department of Toxic Substances Control (DTSC) has reviewed the letter dated January 30, 2015, from Advanced GeoServices Corp on behalf of Exide Technologies, Inc. (Exide) regarding the Reverb Furnace Feed Room. The letter was prepared in response to a January 29, 2015 email requesting an alternative approach for managing free liquids in the feed room. The January 29, 2015 email was prepared to address comments made during a January 28, 2015 meeting with DTSC staff and representatives from Exide in which Exide informed DTSC that staff had begun steps to move feed material within the feed room and that liquids are subsequently being generated from the feed material. The January 30 letter describes various actions (e.g., a modified free liquids test, alternative placement of the feed material, shop-vacuum suction, and treatment of liquids) that Exide has implemented to handle the generated liquids. The letter also contends that placing feed material on the temporary liner and collecting any liquid that may accumulate on the liner is the only possible alternative.

The actions specified in the January 30 letter are not consistent with the revised Detailed Containerization Plan dated January 14, 2015, or the approval letter from DTSC for the Temporary Authorization Request for the Containerization Plan Implementation dated January 23, 2015. The revised Detailed Containerization Plan states,

“If wet feed material is identified, the wet material will be loaded into roll-offs with a front end loader within the Containment Building and then moved to a temporary staging location on-site.”

The Plan also states,

“If adequate space is not present on-site for roll-offs of wet material, the roll-offs will be transported off-site for treatment or disposal at an appropriate facility.”

The approval letter states,

“Exide shall immediately commence removal of hazardous waste with Free Liquids from designated Secondary Containment Areas in the Containment Building in accordance with the Plan. If the hazardous waste which initially did not contain free liquids (passed the paint filter test) and is subsequently found to release any liquids, then Exide shall remove the portion of the hazardous waste releasing the liquids and manage it in accordance with the Plan with respect to the removal of hazardous waste from the Secondary Containment Areas.”

California Code of Regulations, title 22, division 4.5, chapter 10, article 2, section 66260.10 states, “Free liquids’ means liquids which readily separate from the solid portion of a waste under ambient temperature and pressure.”

Exide shall commence removal of the material on the temporary liner system in accordance with the approved Temporary Authorization for the Containerization Plan Implementation and the materials shall be removed by March 13, 2015:

1. The material shall immediately be transferred with a front end loader to 20-cubic-yard roll-off bins with metal sliding tops.
2. Empty roll-offs shall be lined.
3. Roll-offs shall be inspected upon delivery for potential leakage issues including gaskets, hinges, and holes in the floor, walls or top. A Delivery Checklist will be completed for each roll-off using a unique number for each roll-off.
4. A dedicated 10-wheel truck with trailer and driver shall be at the facility to move empty roll-offs to the loading location and to move loaded roll-offs to the storage location. A container loading attendant from the roll-off supply company shall also be present to assist the driver in managing the roll-off loading and cover placement. Representatives from the off-site supply company shall be trained on the Exide Health and Safety protocol and must be accompanied by an Exide representative while loading.
5. Material shall be loaded into roll-offs at a rate no less than 330 tons per day (15 full roll-offs per day).
6. Each empty roll-off shall be inspected prior to loading and a Pre-Loading Checklist shall be completed.
7. The truck and trailer with the empty roll-off shall enter the Containment Building Corridor for loading. The roll-off shall be left on the trailer at all times during the loading process inside the Corridor. Care must be taken to prevent spills onto the sides of the roll-off and to prevent overfilling.

8. The roll-off liner will be pulled over the material and duct tape shall be used to secure the liner. The roll-off cover (metal) shall then be shut and secured.
9. The roll-off and truck/trailer shall be decontaminated with a pressure washer inside the Corridor.
10. Shrink wrap shall be applied inside the Corridor across the roll-off to a minimum of 2 feet over the roll-off cover and down the sides of the roll-off.
11. A second larger-sized liner shall be placed over the shrink wrapped roll-off cover and shall hang down over the sides of the roll-off. A second layer of shrink wrap shall be applied over the top and down the sides similar to the first layer of shrink wrap. These shall be conducted inside the Corridor.
12. The truck and trailer shall be inspected for the adequacy of the decontamination procedures and a Decon Checklist shall be completed. Any areas of visible dust or material shall be re-washed until visible dust or material is no longer present.
13. The door to the Corridor shall be closed during loading and decontamination and may be opened only during entry and exit.
14. If material is removed from the Exide facility, it shall be transported as a hazardous waste and managed at a properly authorized facility in accordance with all applicable laws and regulations.
15. If material is stored at the Exide facility, it shall be stored in accordance with the approved Revised Detailed Containerization Plan dated January 14, 2015.
16. Loaded roll-offs stored at the facility shall be inspected after placement in the storage area and a Storage Area Delivery Checklist shall be completed.
17. Loaded roll-offs stored at the facility shall be labelled with a hazardous waste label. The label shall be affixed to the exterior of the roll-off.

If you have any questions regarding this letter you may call me at (916) 255-3605.

Sincerely,



Rizgar Ghazi, P.E., Chief
Office of Permitting
Hazardous Waste Management Program

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