



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
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Sacramento, California 95826-3200



Edmund G. Brown Jr.
Governor

May 13, 2015

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

RESPONSE TO LETTER DATED APRIL 13, 2015, EXIDE TECHNOLOGIES,
VERNON, CALIFORNIA; EPA ID. NO. CAD097854541

Dear Mr. Strang:

The Department of Toxic Substances Control (DTSC) has reviewed the letter dated April 13, 2015, from Advanced Geoservices (Letter) requesting authorization to backfill an open excavation at the CL-14 leak detection zone and to revise the frequency for sample analysis of liquids entering the leak detection system to monthly at the Exide Technologies (Exide) facility located at 2700 and 2717 South Indiana Street in Vernon. The Letter indicates that Exide's contractor conducted activities to address liquids entering the leak detection zone but that the pathway has not yet been identified.

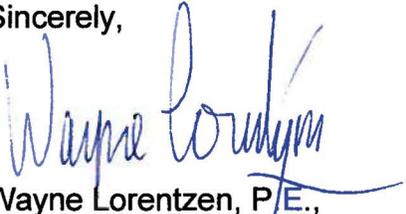
DTSC expects the installation of the replacement stormwater system to conform to the procedures and specifications detailed in the approved Stormwater Management System Replacement Plan dated August 19, 2013 (Replacement Plan). As DTSC considers the stormwater system to be ancillary to the Pump Sump at the Drop Out System, DTSC continues to expect the stormwater system to comply with the requirements and standards specified in California Code of Regulations, title 22, division 4.5, chapter 15, article 10 until the unit and the system are closed in accordance with an approved Closure Plan. Therefore, backfilling of the excavation is acceptable if it is conducted in accordance with the Replacement Plan and Chapter 15 requirements.

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Sample analysis of the accumulated liquids must be conducted prior to the start of each removal in accordance with the Temporary Leak Detection System Operating Procedure dated January 24, 2014. DTSC expects continued adherence to the operating procedures specified in that document.

If you have any questions regarding this letter you may call me at (916) 255-3883.

Sincerely,



Wayne Lorentzen, P/E.,
Senior Hazardous Substances Engineer
Permitting Division

cc: Sent Via Email

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