



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

May 13, 2015

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

**STORAGE OF FEED MATERIAL IN BLAST FURNACE FEED ROOM, EXIDE
TECHNOLOGIES, VERNON, CALIFORNIA; EPA ID. NO. CAD097854541**

Dear Mr. Strang:

The Department of Toxic Substances Control (DTSC) previously determined that the Blast Furnace Feed Room at the Exide Technologies (Exide) facility in Vernon does not meet the design and operating standards for Containment Buildings. DTSC's Third Notice of Deficiency dated June 16, 2014, notes that inspections revealed interior openings between buildings, including the Blast Furnace Feed Room, that allow free transfer of airborne particulates. DTSC will continue to enforce applicable requirements under the Hazardous Waste Control Law and requirements for interim status despite the termination of interim status and the imminent closure of the Exide facility. DTSC has not received any verification that sufficient repairs to these buildings have been made to meet the design and operating standards for Containment Buildings as specified in California Code of Regulations, title 22, §66265.1101. Therefore, DTSC has determined that storage of feed material in the Blast Furnace Feed Room is not appropriate and removal of this material prior to closure activities is necessary to protect human health and the environment.

Exide shall submit for DTSC approval a work plan by May 22, 2015, that describes the procedures that will be used to safely remove the remaining feed material from the Blast Furnace Feed Room by June 30, 2015. The work plan shall include a summary of the types and quantities of wastes stored and the proposed destination for each type of waste. The work plan shall also describe how fugitive dust will be contained from loading operations in the Containment Building and how trucks and trailers will be

Mr. Thomas Strang

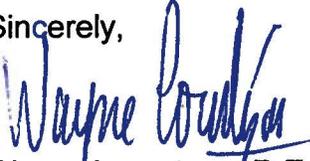
May 13, 2015

Page 2

decontaminated and dried. The work plan must also include a map showing proposed transportation routes, an estimate of the number of trucks required on each route and a loading and shipping schedule.

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

Sincerely,



Wayne Lorentzen P.E.

Permitting Division

Hazardous Waste Management Program

cc: Sent Via Email

Exide Technologies, Inc.

Mr. Thomas Strang

Vice President - Environmental Health & Safety – Americas

Tom.Strang@na.exide.com

Mr. Chuck Giesige

Vice President – Recycling Operations – Americas

Chuck.Giesige@na.exide.com

Mr. Fred Ganster

Environmental Health and Safety

Fred.Ganster@exide.com

Mr. John Hogarth

Vernon Recycling Center

John.Hogarth@exide.com

Ms. Christine Graessle

Assistant General Counsel

Christine.Graessle@exide.com

South Coast AQMD

Mr. Ed Pupka

EPupka@aqmd.gov

Mr. Thomas Strang
May 13, 2015
Page 3

cc: Sent Via Email

City of Vernon

Mr. Jerrick Torres
JTorres@ci.vernon.ca.us

Advanced Geoservices

Mr. Paul Stratman
pstratman@advancedgeoservices.com

Ms. Barbara Forslund
bforslund@advancedgeoservices.com

Ms. Jennifer DiJoseph
jdijoseph@advancedgeoservices.com

Department of Toxic Substances Control

Ms. Elise Rothschild
Deputy Director
Hazardous Waste Management Program
Elise.Rothschild@dtsc.ca.gov

Mr. Richard Sherwood
Assistant Chief Counsel
Office of Legal Affairs
Richard.Sherwood@dtsc.ca.gov

Mr. Rizgar Ghazi, P.E., Chief
Permitting Division
Hazardous Waste Management Program
Rizgar.Ghazi@dtsc.ca.gov

Mr. Keith Kihara, Chief
Enforcement and Emergency Response Division
Hazardous Waste Management Program
Keith.Kihara@dtsc.ca.gov

Ms. Christie Bautista
Senior Environmental Scientist Supervisor
Enforcement and Emergency Response Division
Hazardous Waste Management Program
Christie.Bautista@dtsc.ca.gov

Mr. Thomas Strang
May 13, 2015
Page 4

cc: Sent Via Email

Ms. Suhasini Patel
Senior Environmental Scientist Supervisor
Office of Permitting
Hazardous Waste Management Program
Sahasini.Patel@dtsc.ca.gov

Mr. Wayne Lorentzen
Senior Hazardous Substances Engineer
Office of Permitting
Hazardous Waste Management Program
Wayne.Lorentzen@dtsc.ca.gov

Mr. Bill Veile
Hazardous Substances Engineer
Office of Permitting
Hazardous Waste Management Program
Bill.Veile@dtsc.ca.gov