South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 - www.aqmd.gov

July 6, 2015

Mr. Thomas Strang
Vice President
Exide Technologies, Inc.
Environmental Health & Safety – Americas
Building 200
13000 Deerfield Parkway
Milton, GA 30004

Subject: SCAQMD COMMENTS ON THE CLOSURE PLAN, EXIDE TECHNOLOGIES, VERNON, CALIFORNIA (Facility ID # 124838)

Dear Mr. Strang:

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to review and comment on the Exide Technologies, Inc., (Exide) Closure Plan, dated May 15, 2015, which was prepared by Advanced GeoServices Corporation (AGC) on behalf of Exide. The State of California Department of Toxic Substances Control (DTSC) has also reviewed the subject Closure Plan and has issued a Notice of Deficiency (NOD) letter dated June 17, 2015. DTSC's NOD letter which included several attached memorandums identified various issues that must be addressed prior to DTSC notification of the Closure Plan for public comment.

In DTSC's June 17th NOD letter, Exide was advised that "SCAQMD has jurisdiction over air quality issues related to the Closure Plan and they will be submitting a separate letter with their comments." During the May 21, 2015 meeting and follow up conference calls with Exide, DTSC and SCAQMD, where Exide's consultant, AGC, provided briefing on the Closure Plan, SCAQMD and DTSC provided input on matters relating to Exide's closure including some of the deficiencies identified in DTSC's June 17th letter and attachments to Exide. In general, SCAQMD agrees with the comments provided by DTSC in their June 17th NOD letter with respect to the air quality issues, as they relate to the Closure Plan.

Below please find additional specific SCAQMD comments on air quality issues relative to Exide's May 15, 2015 Closure Plan:

1. Exide must clarify how it intends to remove the lead material from the refining kettles. The Closure Plan must include a list of options for the removal of lead from the kettles to address this deficiency. Exide must also demonstrate why the option it recommends results in the least amount of emissions and poses the lowest risk to the community.

2. During the briefing meetings provided by AGC, SCAQMD discussed our concerns regarding the demolition of the Total Enclosure buildings. First of all, and based on AGC's representations, it was our understanding that the air pollution control equipment and ducting for the Total Enclosure would not be removed until the walls of the Total Enclosure had first been removed. However, there are several references in the Closure Plan indicating that the air pollution control equipment will be cleaned and then removed. This action would fully disable the emission control capabilities of the Total Enclosure. SCAQMD requires that the Closure Plan clearly states the procedure for decontamination and removal of walls of the Total Enclosures will take place in areas under negative pressure while the Total Enclosure remains fully operational (including properly operating air pollution control equipment and ducting) until the walls of the structure itself are fully demolished.

   In the Closure Plan and its Appendix, Exide proposes to construct a windbreak on outside walls by securing plastic sheeting on scaffolding or building structural elements. Secondly, as discussed during our briefing meetings, Exide must use temporary enclosures, similar to those used for the removal of the wall panels, for the removal of the roof panels allowing the Total Enclosure to remain under constant negative pressure until all panels from the walls and the roof of the Total Enclosure are removed. DTSC has also requested, in the June 17th NOD letter to Exide, that Exide "include covering the roofs of buildings during deskinning in these plans." SCAQMD requests that Exide address these specific concerns in the Closure Plan to include provisions for the covering of the buildings' roofs during removal of the roof panels, as well as the wall panels, and to ensure the air pollution control equipment and ducting is in full use to provide a negative pressure in the Total Enclosure until all wall and roof panels are removed. In addition, the Closure Plan must describe how the scaffolding and plastic windbreak, which will most likely be contaminated with fugitive lead emissions due to removal of wall and roof panels, will be handled in a manner to eliminate and minimize release of any fugitive lead emissions during the removal and disposal of these materials.

3. The Closure Plan indicates that a SCAQMD Permit to Operate will be obtained for temporary equipment proposed for use during the closure process to include an onsite portable concrete crusher. During the May 21, 2015 briefing meeting

and presentation, SCAQMD expressed significant concerns about the use of an onsite portable concrete crusher at Exide's Vernon facility. On June 2, 2015, SCAQMD received the attached letter from AGC stating that Exide had changed the proposed method for managing concrete generated during closure to characterize and proceed with off-site disposal. However, in the last paragraph of this letter, AGC states that "*Exide reserves the right to revisit the need for onsite concrete crushing and reuse, as required by project conditions.*" The SCAQMD is concerned about this statement in the June 2nd letter and requests that Exide provides clear and specific language in the Closure Plan to indicate the proposed change from onsite crushing and reuse of concrete and remove all references relative to the use of an onsite portable concrete crushing operations. DTSC has also requested that Exide remove all references to onsite concrete crushing activities from the Closure Plan and include clear and specific provisions for off-site disposal.

4. The Closure Plan references cleanup levels for Volatile Organic Compound (VOC) contamination in Soil Vapor. The section is listed under Closure Performance Standards. Please note that prior to the excavation, grading, handling and treating of volatile organic contaminated soil, Exide must fully comply with all provisions of SCAQMD's Rule 1166 – Volatile Organic Compound Emissions From Decontamination of Soil. Rule 1166 defines VOC contaminated soil as a soil that registers a concentration of 50 ppm or greater of VOCs as measured before suppression materials have been applied and at a distance of no more than three (3) inches from the surface of the excavated soil with an organic vapor analyzer calibrated as hexane. Rule 1166 requires that prior to commencement of excavation and handling of VOC contaminated soil, Exide must submit to SCAQMD for its review and approval a Mitigation Plan. Further, the equipment used for decontamination and remediation of VOC-contaminated soil may also require SCAQMD permits. Please revise the Closure Plan to include these requirements.

5. The Closure Plan must include a general statement that Exide and its consultants and contractors shall fully comply with all applicable air quality Rules and Regulations, Compliance Plans, Permit Conditions, Orders for Abatement and any other applicable federal, state and local air quality related requirements. In addition, any plans or activities that have the potential to result in the release of fugitive-lead-containing dust shall be subject to notification to and review by the SCAQMD and may require the submittal of a Mitigation Plan for review and approval prior to commencement of work. All Mitigation Plans submitted to the SCAQMD for review and approval shall include a description of procedures for the receipt and shipment of any lead containing materials to and from Exide.

6. Finally, due to a potential for the generation of fugitive-lead-containing dust and/or an accidental spill during the transportation of various materials to and from Exide, and in order to address concerns raised by the community members

during DTSC's Community Advisory meetings regarding Exide's closure, and as requested by DTSC, Exide must include a transportation plan in the revised Closure Plan that proposes the exact routes that trucks will take to their final destination, and a method to verify the specified routes are followed.

If you have any questions regarding this letter please contact me at (909) 396-2662 or mnazemi1@aqmd.gov.

Sincerely,

Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance

Attachment

MN:am

cc: Barry Wallerstein, SCAQMD
Kurt Weise, SCAQMD
Bayron Gilchrist, SCAQMD
Barbara Baird, SCAQMD
Nancy Feldman, SCAQMD
Barbara Lee, DTSC
Rizgar Ghazi, DTSC
Suhasini Patel, DTSC
John Hogarth, Exide
Jennifer DeJoseph, AGC