

Exide Technologies, Vernon, CA

Draft Closure Plan

June 11, 2015



DTSC



South Coast
AQMD

Topics To Be Discussed

- Closure Plan Overview
- Exide's Proposed Plan
- Proposed Plan - Improvements
- Next Steps
- Technical Advisor

What is a Closure Plan?

- Closure Plan is part of the Permitting process
- Closure Plan Requirements:
 - Performance Standards
 - Financial Assurance
 - Detailed plan for the entire process

Where is DTSC in the Closure Plan process for Exide?

- Exide submitted the Closure Plan on May 15th
- DTSC has 30 days to review the Plan



Components of Closure Plan

- Removal of Inventory and Wastes
- Decontamination
- Deconstruction

Pre-Closure Plan Work

Removal of Stored Material





Closure Plan (Proposed)

Removal and management of waste





Closure Plan (Proposed)

Unit Decontamination



Closure Plan (Proposed)

Unit Decontamination



Closure Plan (Proposed)

Confirmation Sampling



<http://www.arushaconstruction.com/lead-dust-wipe-clearance.html>



<https://cna.ca/news/uranium-mines-and-mills-subject-to-strict-regulations/>

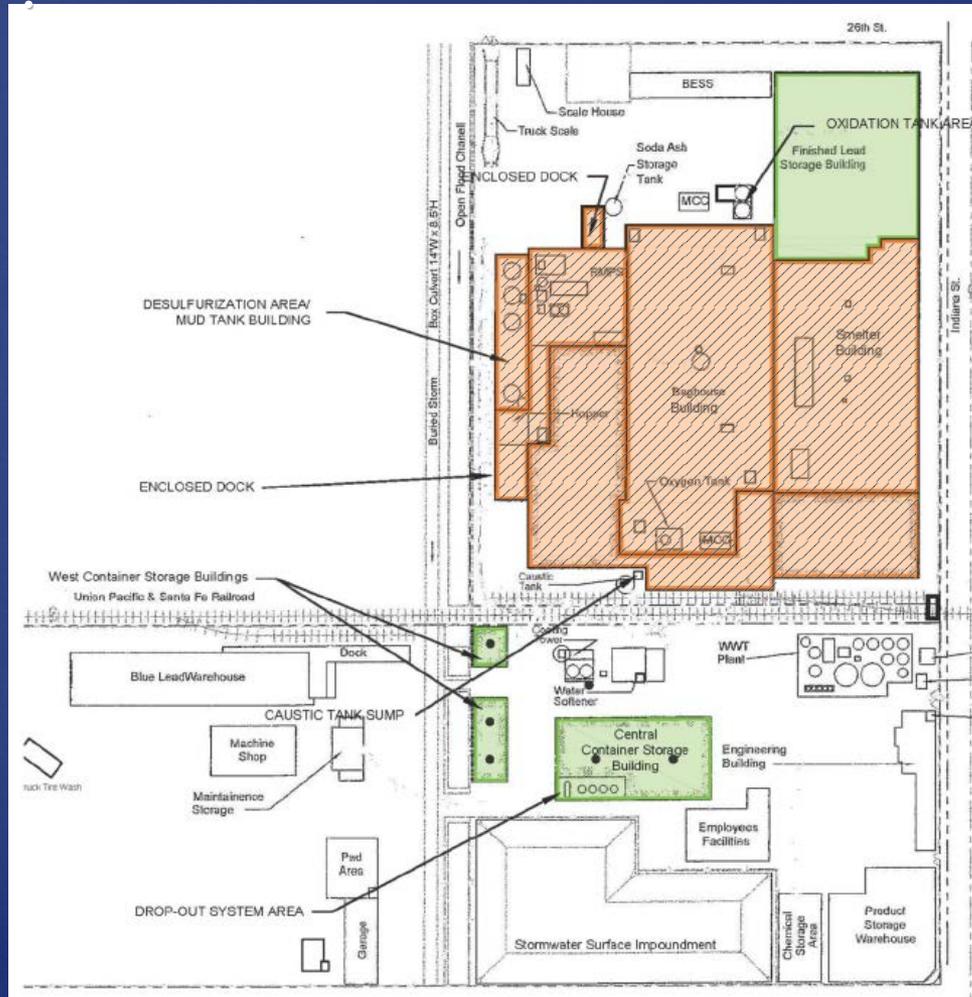
Closure Plan (Proposed)

Removal of RCRA Units for Re-use:

- Paste Thickening Unit
- Reverb Furnace
- Blast Furnace
- Hammer Mill
- Flocculation Tank
- Rotary Kiln
- Surge Tank
- Kettles

Closure Plan (Proposed)

Containment Area and Building Decontamination



Closure Plan (Proposed)

Confirmation Sampling of Containment Area and Building



<http://www.gemalab-qc.com/apps/photos/photo?photoid=156855780>



<http://www.robertliles.com/Concrete.htm>

<http://concreteinspectors.com/faqs/>

Closure Plan (Proposed)

Soil Sampling

Concrete
Soil Sample 0-1'
Soil Sample 1-2'
Soil Sample 2-3'
Soil Sample 6-7'



<https://ndep.nv.gov/fallon/photos.htm>

Closure Plan (Proposed)

Air Sampling

- Real-time air monitoring with movable monitors
- Current fence line monitors
- Personal air monitors



<http://www.tsi.com/dusttrak-ii-aerosol-monitor-8532/>

Closure Plan (Proposed)

Building Deconstruction



Closure Plan (Proposed)

Stormwater System Decontamination

- 3,100 linear feet of piping
- Surface Impoundment liner



<http://www.waterworld.com/articles/print/products/2012/10/joint-seals.html>

Proposed Plan - Improvements

- Cleaner standards
- Less waste left in place
- Improved Sampling and Analysis Plans
- Better characterization before reuse
- Submittal of plans to determine background levels

The list of deficiencies will be posted on DTSC's Website

Next Steps

- DTSC to Issue a Notice of Deficiency (NOD)
- Exide has 15 days to revise the Closure Plan and re-submit to DTSC
- DTSC to review revised plan
- DTSC will impose a Plan that will be Protective of the Community

Technical Advisor

- Update on selection
- July 1 target date