ADVANCED GeoServices
Engineering for the Environment. Planning for People.
1055 Andrew Drive, Suite A, West Chester, PA 19380-4293
tel 610.840.9100 fax 610.840.9199
www.advancedgeoservices.com

April 1, 2015 2013-2993-19

Mr. Wayne Lorentzen
California Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

RE: Interim Status (Class 1) Modification - Section 9 and Contingency Plan Revisions
Exide Technologies
Vernon, California
CAD 097 854 541

Dear Mr. Lorentzen:

Advanced GeoServices, on behalf of Exide Technologies, submits this Interim Status (Class 1) Modification for the Exide Technologies facility in Vernon, California. This Interim Status Modification includes revisions to Section 9 (Crisis Management Plan/Contingency Plan), and the Crisis Management Plan/Contingency Plan (Appendix I).

REVISIONS

Revisions have been made to Section 9 (Crisis Management Plan/Contingency Plan), and Crisis Management Plan / Contingency Plan (Appendix I). The revisions include updates to emergency contact information. The changes are necessary as facility personnel have changed. The revisions also include updates to notification procedures as requested by the City of Vernon. Replacement pages for the revised documents are enclosed.

PUBLIC NOTICE

Even though a public notice is not required for an Interim Status Modification, a notice will be sent to the facility mailing list in accordance with Title 22, 66270.42 and the appropriate units of state and local government within 90 days of this letter. As Department approval of the modification is not required, a newspaper notice is not required.

If you have any questions, please contact John Hogarth at Exide at (323) 262-1101 x275 or Jen DiJoseph at Advanced GeoServices at (610) 840-9189.

Sincerely,

ADVANCED GEOSERVICES

Jennifer W. DiJoseph
Associate Project Consultant

Paul G. Stratman, P.E.
Consultant

REGISTERED PROFESSIONAL ENGINEER
PAUL GERARD STRATMAN
NO. C61595
EXP. 6/30/15
CIVIL
STATE OF CALIFORNIA

JWD:PGS:vm

Enclosures

cc: N. Serieys
T. Strang
J. Hogarth
Repository

PUBLIC NOTICE

PUBLIC NOTICE OF INTERIM STATUS MODIFICATIONS
EXIDE TECHNOLOGIES, EPA ID NO. CAD 097 854 541

On February 27, 2015 and April __, 2015, Exide Technologies (Exide), 2700 South Indiana Avenue, Vernon, California, 90058 submitted applications for a Interim Status Modifications to the State of California, Department of Toxic Substances Control (DTSC), 8800 Cal Center Drive, Sacramento, California, 95826-3200. DTSC is the State agency authorized to issue or deny applications for hazardous waste facility permits and other forms of authorization pursuant to the California Hazardous Waste Control Law and its implementing regulations.

Exide operated a metal (lead) treatment and storage/recycling facility at the Vernon location for the recovery of lead from automotive batteries and other lead-bearing materials received from off-site and generated on-site. The February 27, 2015 application addresses revisions to the facility's Crisis Management Plan / Contingency Plan and Spill Prevention Control and Countermeasures Plan. The revisions include updates to emergency contact information. The April __, 2015 application addresses revisions to the facility's Crisis Management Plan / Contingency Plan. The revisions include updates to emergency contact information and notification procedures. This is Class 1 modification and it does not require DTSC's prior approval before the change is put into effect.

The public is invited to review information about the Exide facility and documents related to this Interim Status Modification at the Maywood Cesar Chavez Public Library, 4323 Slauson Avenue, Maywood or Department of Toxic Substances Control, 5796 Corporate Avenue, Cypress. During normal business hours, please call (714) 484-5337 for an appointment. To view electronic versions of Exide project documents, please visit DTSC's website: http://www.dtsc.ca.gov/HazardousWaste/Projects/exide.cfm. The permittee's compliance history during the life of the permit being modified is available from the Department contact person.

A copy of the Interim Status Modification and supporting documents are available for review at the Exide facility at 2700 South Indiana Avenue, Vernon, California, 90058.

You are receiving this notification because you have expressed interest in matters concerning the Exide Facility and/or you are on the facility mailing list. If you have any questions regarding this Interim Status Modification, please contact Mr. John Hogarth, Exide Plant Manager, at (323) 262-1101 ext. 275 or Mr. Wayne Lorentzen, DTSC Project Manager at (916) 255-3883.

SECTION 9.0

Crisis Management Plan/Contingency Plan: Preparedness/Prevention and Emergency Procedures

Replacement Page

Date: August 2014, Revised April 2015
Revision: 7B

CRISIS MANAGEMENT/CONTINGENCY PLAN
AUTHORIZED EMERGENCY COORDINATORS AND ALTERNATIVES

Persons authorized to act as Emergency Response Coordinators are listed below.

NAME	TITLE	PLANT # 323/262-1101	PAGER #	PIN #	HOME #	CELLULAR #
*Nicolas Serieys – PRIMARY EC	Interim Env. Manager	EXT. 259	NA	NA		310 909 3884
Claudia Caneo	Safety Mgr.	EXT. 276	NA	NA		323 828 0875
John Hogarth	Plant Manager	EXT. 275	NA	NA	626-345-5008	323-395-6130
Rafael Perez	Operations Manager	EXT. 241	NA	NA		818-974-5358
John Martinez	Maintenance Supervisor	EXT. 226	NA	NA	909-923-4239	323-203-8864
Mamun Hossain	Materials Manager	EXT 211	NA	NA		323-816-3508

* Designated Emergency Coordinator
The primary emergency coordinator is designated above. Remaining coordinators are presented in the order in which they will assume responsibility as alternates.

AUTHORIZED SHIFT SUPERVISOR (On-Site Coordinators)
Persons authorized to act as Shift Supervisors are:
(Alternative Emergency Coordinator or on-site Coordinator)

NAME	TITLE	PLANT # 323/262-1101	PAGER #	CELLULAR #	HOME #
Art Vasquez	Smelting & Refining Mngr.	EXT. 286	NA	626-991-0755	
Lorenzo Carlos	Shift Supervisor	EXT. 286	NA	323 216-9033	
Marshall Pitts	Shift Supervisor	EXT. 286	NA		

APPENDIX I

Crisis Management Plan/Contingency Plan

Replacement Pages

CRISIS MANAGEMENT PLAN / CONTINGENCY PLAN
SECONDARY LEAD SMELTER

Prepared for

2700 South Indiana St.
Vernon, California, 90058
(323) 262-1101, Fax (323) 262-0642

Original: February 2005

Revised: April 2006

Revised: January 2009

Revised: November 2009

Revised: March 2010

Revised: September 2011
Revised by
Advanced GeoServices
West Chester, Pennsylvania

Revised April 2012
Collaborative Revision by Advanced GeoServices and Exide Technologies

Revised January 2013
Revised by Advanced GeoServices

Revised March 2013
Revised by Advanced GeoServices

Revised August 2014
Revised by Advanced GeoServices

Revised February 2015
Revised by Advanced GeoServices

Revised April 2015
Revised by Advanced GeoServices

CONTENTS

ACTION PACKAGE CRISIS MANAGEMENT PLAN/CONTINGENCY PLAN

1.0 Introduction 1

2.0 KEEPING PLAN CURRENT 5
2.1 Plan Distribution Record 5

3.0 PREPAREDNESS AND PREVENTION 8
3.1 Plant Operation, Maintenance, and Required Equipment 9
3.2 Access to Communications or Alarm Systems 12
3.3 Required Aisle Space 13
3.4 Arrangements with Local Authorities 13

4.0 CONTINGENCY PLAN 15
4.1 Contingency Plan Implementation 15
4.2 Responses to Emergencies 15
4.3 Evacuation Plan 18

5.0 COPIES AND AMENDMENT OF CONTINGENCY PLAN 21

6.0 EMERGENCY COORDINATOR 23

7.0 EMEGENCY PROCEDURES 25
7.1 General Emergency Procedures 25
7.2 Emergency procedures for the Emergency Coordinator 26
7.3 Post Emergency Procedures 29
7.4 Emergency Protocols in Non-Critical Plant Areas 30
7.5 Emergency Protocols in Critical Plant Areas 31
7.6 Emergency Response Actions for Specific Plant Areas 33
7.6.1 Baghouse Area 33
7.6.2 Blast Furnace Area 34
7.6.3 Reverb Furnace Area 35
7.6.4 Refining Area 36
7.6.5 Raw Materials Preparation System (RMPS) Area 37
7.6.6 Maintenance Area 38
7.6.7 Garage Area 39
7.6.8 Plant Services Area 40
7.6.9 Main Office 41
7.7 Specific Emergency Response Guides 42

8.0 ACTION PACKAGE FOR EMERGENCIES 43

9.0 PERSONNEL TRAINING 44

RESPONSE GUIDES

Response Guide 1	Fires	RG-1
Response Guide 2	Explosion/Plane Crash/Building Collapse	RG-4
Response Guide 3A	Acid Spill	RG-5
Response Guide 3B	Caustic Solids Spill	RG-8
Response Guide 3C	Caustic Liquid Spill	RG-11
Response Guide 3D	Oil Spill	RG-14
Response Guide 3E	General Liquid Spills	RG-16
Response Guide 3F	Regulated Tank Leak / Failure	RG-19
Response Guide 4A	Lead Paste / Desulfurized Mud Spill	RG-22
Response Guide 4B	Flue Dust Spill	RG-23
Response Guide 4C	Lead-Acid Battery Electrolyte Spill	RG-26
Response Guide 4D	Waste Lead Acid Battery Spill	RG-27
Response Guide 5A	Power Failures	RG-28
Response Guide 5B	Utility Failures	RG-29
Response Guide 5C	Wastewater Discharges	RG-30
Response Guide 5D	Wastewater / Chemical Treatment Plant Solids	RG-31
Response Guide 6	Earthquake Disaster	RG-33
Response Guide 7A	Bomb Threat	RG-34
Response Guide 7B	Public Disturbance / Riot	RG-35
Response Guide 8	First Aid Procedures	RG-36

APPENDICES

Appendix A Emergency Response Action Package
Appendix B Emergency Response Equipment
Appendix C Evacuation Routes
Appendix D MSDS List and OSHA Health & Safety Information for Lead
Appendix E Administration Forms
Appendix F Arrangements With Local Authorities
Appendix G Revisions Log

490.40556
\490-00\CRISIS MANAGEMENT PLAN 08 2014.DOCX

1.0 INTRODUCTION

The Exide Technologies Vernon Facility is a secondary lead recycling plant which recovers lead primarily from spent lead-acid automotive batteries as well as other lead-bearing materials. This plan defines the actions to be taken in the event of any emergency which might arise at the plant that could cause or result from the release or threatened release of hazardous materials or hazardous wastes.

This Crisis Management Plan/Contingency Plan is required by the State of California which has adopted the Federal RCRA Hazardous Waste Regulations. As a hazardous waste storage and treatment facility, the Vernon facility is required by the California Environmental Protection Agency (CA EPA), to meet the following requirements:

Preparedness and Prevention: Title 22 CCR Sections 66264.30-37

Contingency Planning and Emergency Procedures: Title 22 CCR Sections 66264.50-56

Personnel Training: Title 22 CCR Section 66264.16

Release or Threatened Release Reporting: 26 CCR 19-2703 & 19-2705

OSHA Regulations: 29 CFR 1910.120

This plan contains the requirements and methods that are used to meet personnel training requirements. However, the personnel training program details are not covered in this document.

The referenced regulations require Vernon to minimize the possibility of fire, explosion, or any release of hazardous waste or hazardous materials to air, soil, or surface water which could significantly impact human health or the environment. There are four major components of the regulations regarding Contingency Plans:

- **Preparedness** — The items related to operating and maintaining a plant with the required communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment.

- **Prevention** — Operating procedures that significantly reduce the potential of an emergency that could impact human health or the environment.

- **Contingency Plan** — The procedures performed when the plan is implemented to respond to fire, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous materials to air, soil, or surface water at the

plant including internal and external support from personnel and other authorities, role of the emergency coordinator, evacuation plan, and administration of the plan.

- **Emergency Procedures** — The specific site emergency procedures that are used to respond to minor emergencies, as well as, an imminent or actual emergency situation that requires the activation of the contingency plan including determination of the source or cause of the emergency, assessment of the potential impacts, notification of authorities relative to impacts associated with the emergency, mitigation of emergency, restoration of routine operations, and submittal of a written report after the incident.

The Vernon facility receives spent (used) lead-acid batteries and other lead bearing materials and recycles them to recover lead and polypropylene. The general classes and types of emergencies that could occur at this industrial plant are the following:

- Fires and explosions
- Hazardous material/waste spills and overflows
- Utility failures - electrical failure, gas leak/service interruption, telephone outage, water/sewerage overflows
- Serious health injury - physical injuries, heart attacks, strokes, and fatalities
- Natural disasters - windstorms, earthquakes, and floods
- Others including public disturbances, bomb threats, vandalism, and sabotage

The Vernon facility management is dedicated to providing the sufficient resources necessary to minimize the potential for fire, spills, or any unplanned sudden or non-sudden release or threatened release of hazardous material/waste to the air, soil, or surface water which could significantly impact human health and the environment. The most likely and reasonable emergency scenarios that can occur at the plant are hazardous material/waste spills, utility failures including electrical failure, gas leak/service interruption, water/sewerage overflows, fires and explosions, and earthquakes. This facility handles hazardous materials/wastes onsite. The reportable spill quantities for these materials are listed below in **Table 1**. **Appendix D** contains material safety data sheets (MSDS) for these compounds and information on the safe handling of lead.

Corporate Management requires plant managers to plan for emergencies by conducting personnel training on specific response procedures that can, when performed, minimize the threat to human health and the environment. Corporate policy also mandates that facility managers conduct safety inspections each month so that deficiencies can be identified and resolved. This monthly safety inspection checklist as well as forms for reporting spills, lost time, and other health and safety incidents are located in **Appendix E**.

This Crisis Management/Contingency Plan will address the spectrum of potential emergency events but will provide a greater depth of coverage for the more probable emergency scenarios.

Table 1: Hazardous Materials / Wastes Handled Onsite and Reportable Spill Quantities

Material	Constituents of Concern	Reportable Quantity [B]	Estimated Quantity of Spilled Material to Reach RQ[A]
Lead and Lead Compounds (Dust)[A]	Lead	10 lb	10 lb
Lead-Bearing Scrap (Dust)[A]	Lead Arsenic Cadmium Antimony Copper	10 lb 1 lb 10 lb 5000 lb 5000 lb	10 lb / Lead fraction 1 lb / Arsenic fraction 10 lb / Cadmium fraction 5000 lb / Antimony fraction 5000 lb / Copper fraction
Secondary Lead Smelting Furnace Flue Dust	K069 Listed Waste	10 lb	10 lb
Lead-Acid Batteries (spilled/leaked contents)	Lead Lead Corrosive Waste Sulfuric Acid	10 lb 10 lb 100 lb 1000 lb	10 lb lead paste ½ gallon electrolyte if >5 mg/L lead 6.5 gallons electrolyte if pH < 2 65 gallons electrolyte (15.3 lb/gal)
Spent Lead-Acid Battery Electrolyte	Lead Corrosive Waste Sulfuric Acid	10 lb 100 lb 1000 lb	½ gallon if lead content >5 mg/L 6.5 gallons if pH < 2 65 gallons (15.3 lb/gal)
Lead Paste / Desulfurized mud	Lead	10 lb	10 lb
Sulfuric Acid	Sulfuric Acid	1000 lb	65 gallons (15.3 lb/gal)
Nitric Acid	Nitric Acid	1000 lb	84 gallons (11.8 lb/gal)
Acetic Acid	Acetic Acid	5000 lb	570 gallons (8.75 lb/gal)
Lead Carbonate, $PbCO_3$	Lead	10 lb	12.9 lb (77.54% lead content)
Arsenic (Dust)[A]	Arsenic	1 lb	1 lb
Caustic Soda (Sodium Hydroxide)	NaOH	1000 lb	1000 lb as dry chemical (pellet/flake) 56 gallons of solution (17.8 lb/gal)
Potassium Hydroxide	KOH	1000 lb	1000 lb as dry chemical (pellet/flake)
Acetone	Acetone	5000 lb	757 gallons (6.6 lb/gal)
Methanol	Methanol	5000 lb	757 gallons (6.6 lb/gal)

Material	Constituents of Concern	Reportable Quantity [B]	Estimated Quantity of Spilled Material to Reach RQ[A]
Ferric Chloride	Ferric Chloride	1000 lb	1000 lb as dry chemical 41 gallons in solution (24.2 lb/gal)
Corrosive Hazardous Waste	pH < 2 pH > 12.5	100 lb 100 lb	100 lb 100 lb
Toxic Hazardous Waste [C]	Lead, >5 mg/L Arsenic, >5 mg/L Cadmium, >1 mg/L	10 lb 1 lb 10 lb	10 lb 1 lb 10 lb

[A] If a released material consists of solid particles of antimony, arsenic, cadmium, chromium, copper, or lead with a mean diameter greater than 100 microns (0.004 inches), notification under CERCLA is not required (40 CFR §302.6).

[B] Notifications must be given for each component in a reportable spill for which an RQ is exceeded. (*e.g., a 1000 gallon spill of spent lead-acid battery electrolyte with pH less than 2 and lead content greater than 5 mg/L would be reportable as sulfuric acid, corrosive hazardous waste, and lead-bearing hazardous waste*).

[C] Constituents of concern levels for these materials represent the toxicity characteristic leaching procedure extract concentrations if the waste is a solid, or the actual component concentrations if the waste is a liquid (see 40 CFR §261.24).

Note: Notification to the City of Vernon and the California State Warning Center is required for releases or threatened releases under the Reportable Quantities if they pose a hazard to human health and safety, environment, or property (notification should be made even if the impacts are potential or delayed).

2.0 KEEPING PLAN CURRENT

This contingency plan must be reviewed and immediately amended whenever there is a change in facility design, construction, operation, maintenance, etc., that materially affects the potential for emergencies to occur at this facility or any of the response protocols described herein. The plan shall also be reviewed after each emergency implementation so that it can be modified as necessary to include mechanisms that can prevent a recurrence of the event, update those procedures or protocols that may need improvement, and modify any component that was shown to be ineffective.

At a minimum this contingency plan must be reviewed annually to confirm emergency contacts (emergency coordinators) names and phone numbers, emergency response agency information, emergency contractor information, response equipment lists, etc.

Federal and State regulations require that copies of this contingency plan be distributed to local emergency response agencies and contractors who may be called upon to provide assistance in an emergency. Whenever revisions to the plan are made, copies of the updated information must also be distributed to all holders of the plan. The following table should be used to assist plant personnel in distributing the plan and any revisions. The Revisions Log located at Appendix G should also be completed in order to track all changes/modifications made to this plan.

2.1 Plan Distribution Record

Revision Number	Date	Distribution Information		
		Recipient	Document Provided?	
6	11/11/09	Plant Environmental Manager	YES	
		Plant Manager	YES	
7	3/1/10	Plant Health & Safety Manager	YES	
		Plant Engineering Manager	YES	
		Corporate Environmental Manager	YES	
		City of Vernon Fire & Rescue 4305 Santa Fe Ave. Vernon, CA 90058	YES	
		City of Vernon Police Department 4305 Santa Fe Ave. Vernon, CA 90058	YES	
		Vernon City Environmental Health 4305 Santa Fe Ave.	YES	

Revision Number	Date	Distribution Information		
		Recipient	**Document Provided?**	
		Vernon, CA 90058		
		Sanitation Districts of Los Angeles County 1955 Workman Mill Rd Whittier, CA 90601	YES	
		California Department of Toxic Substances Control 9211 Oakdale Ave. Chatsworth, CA 91311	YES	
		Los Angeles County USC Medical Center 1200 North State St. Los Angeles, CA 90033	YES	
		White Memorial Medical Center 1720 Cesar E. Chavez Ave. Los Angeles, CA 90033	YES	
		US Health Works; Attention: Pamela Packman 3851 Soto St Vernon, CA 90058	YES	
		US Health Works; Attention: Yvonne Faustinos 3430 Garfield Ave Commerce, CA 90040	YES	
		Advanced Cleanup Technologies, Inc. 18414 S. Santa Fe Ave. Rancho Dominguez, CA 900221-5693	YES	
		Environmental Recovery Services (Enviroserv) 2650 Lime Ave. Signal Hill, CA 90755	YES	
		Advanced GeoServices 1055 Andrew Dr, Suite A West Chester, PA 19380-4293	YES	
Reason for Revision: Change in Industrial Health Care Provider				
8	9/30/11			
9	4/16/2012	Vernon Plant Manager, Health & Safety Manager, HR Manager, Environmental Manager	Yes	
Reason for Revision 9: RCRA Part B Application Changes in Exide personnel, contact information, and vendor information.				
10	1/15/2013	Vernon Plant Manager, Health & Safety Manager, HR Manager, Environmental Manager	Yes	
Reason for Revision 10: RCRA Part B Application. Changes in Exide personnel and contact information.				
11	3/15/13	Vernon Plant Manager, Health & Safety Manager, HR Manager, Environmental Manager	Yes	
Reason for Revision 11: Changes in Exide personnel and contact information.				

Revision Number	Date	Distribution Information		
		Recipient	Document Provided?	
12	8/4/14	Vernon Plant Manager, Health & Safety Manager, HR Manager, Environmental Manager	Yes	
Reason for Revision 12: Changes in Exide personnel and contact information.				
13	2/27/15	Vernon Plant Manager, Health & Safety Manager, HR Manager, Environmental Manager	Yes	
Reason for Revision 13: Changes in Exide personnel and contact information.				
14	4/1/15	Vernon Plant Manager, Health & Safety Manager, HR Manager, Environmental Manager	Yes	
Reason for Revision 14: Changes in Exide personnel, contact information and notification procedures.				

3.0 PREPAREDNESS AND PREVENTION

Vernon is required to maintain and operate the on-site processes in a manner to minimize serious emergencies that can lead to the release or threatened release of hazardous waste or hazardous materials to air, soil, or surface water which could adversely impact human health or the environment. Accidents can and do occur.

Corporate Management requires site managers to personally conduct a safety inspection each month. The items found to be deficient during the safety inspections are required to be followed up and resolved. The Executive Safety Inspection checklist form is located in **Appendix E — Administration Forms**.

The magnitude of an accident can be significantly reduced when the management ensures the following are performed: appropriate planning, development of usable procedures, and training appropriate personnel. The plant management must have an organization that can prepare employees through planning, training, and practice to be prepared to handle assigned roles with respect to emergencies. The plant management must develop procedures to ensure safe operations including material handling, lead production, storage, and shipping.

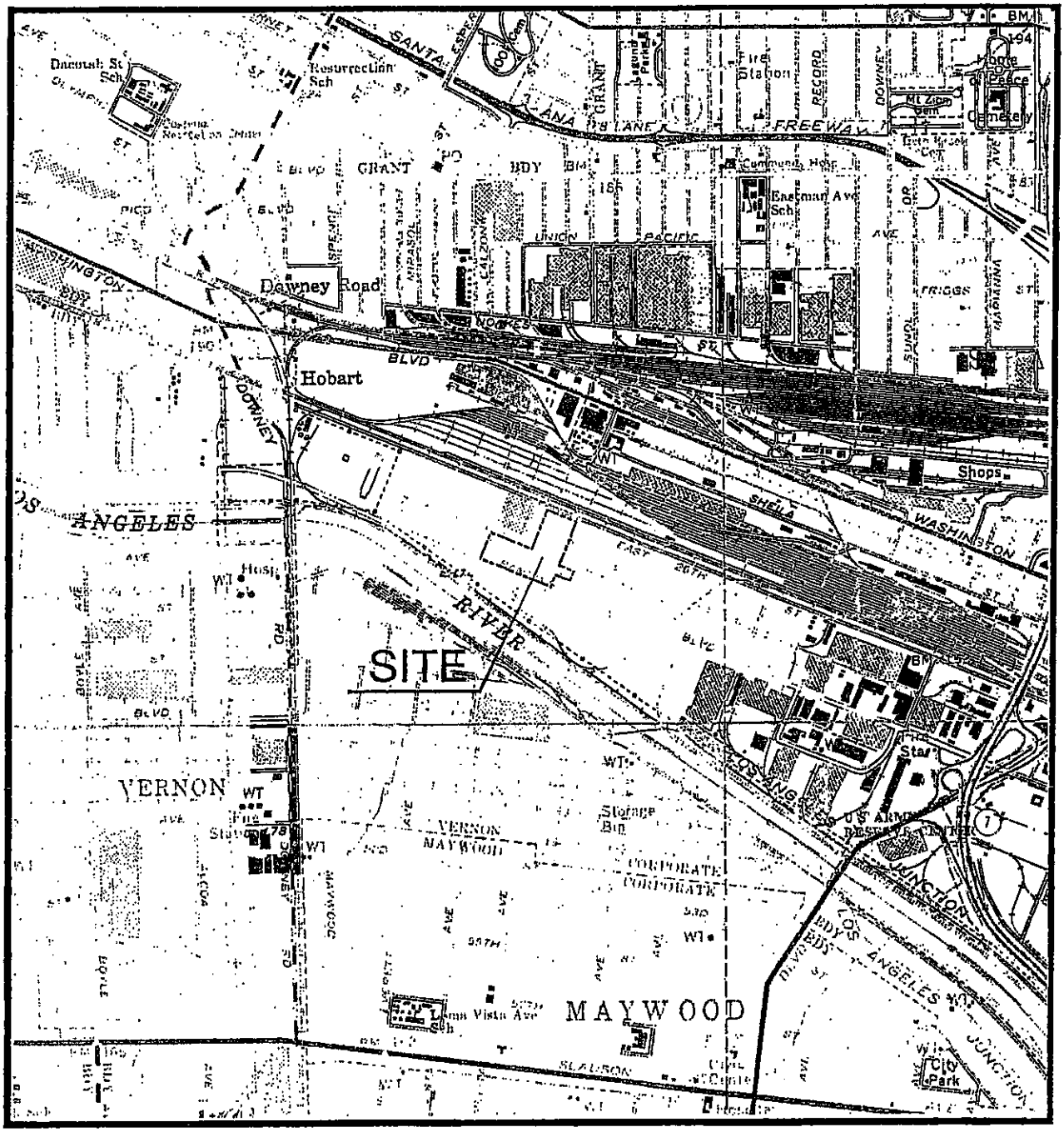
The goal of this plan is to minimize events or conditions that can cause the implementation of the Crisis Management Plan/Contingency Plan. This goal is reflected in plant operations and maintenance procedures for production and emergency equipment.

An action package for emergencies has been created to aid during implementation of the Crisis Management Plan/Contingency Plan. This stand-alone package summarizes the elements of the full contingency plan document and has been designed to be used in the event of an emergency as a set of response action guidelines. **Appendix A** contains a “clean” copy of the Action Package which can be copied to replace a used Action Package.

3.1 Plant Operation, Maintenance, and Required Equipment

The Vernon secondary lead recycling facility recovers lead from automotive batteries and lead-bearing scrap materials. A topographic map showing the location of the plant is presented in **Figure 1**. The site map in **Figure 2** shows the layout and locations of onsite buildings and process areas.

The facility has been designed and constructed, and is maintained and operated to minimize the possibility of fire, explosion, or any unplanned, sudden or non-sudden release of hazardous material/wastes to air, soil, or surface water which could threaten human health or the environment.



SCALE 1:24000

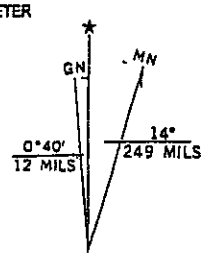
1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 0.5 0 1 KILOMETER

QUADRANGLE LOCATION

Contour interval: 20 feet
Source: Composite of Los Angeles & South Gate, California, 7.5 Minute Series, U.S.G.S. Topographic Maps



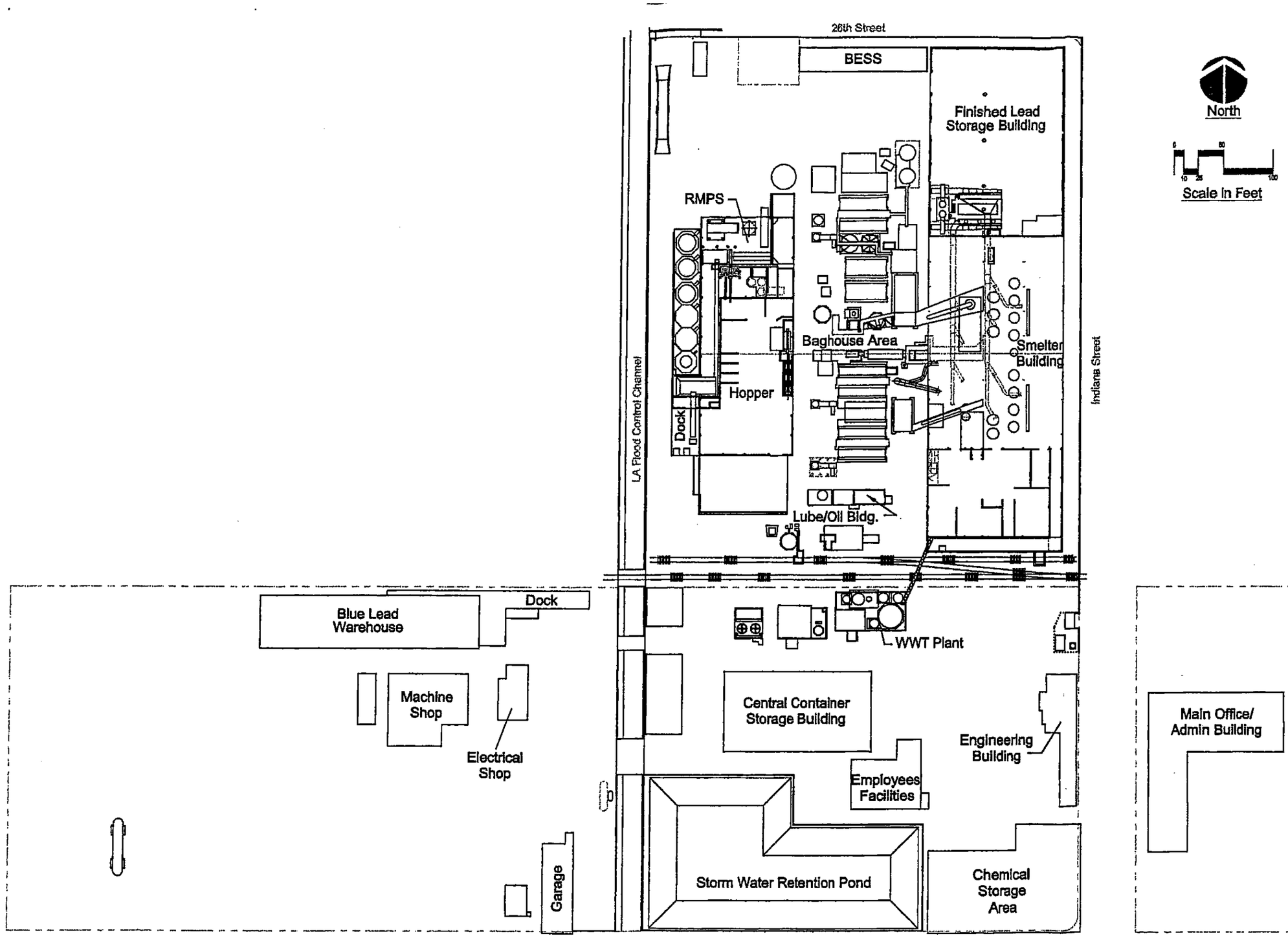
UTM GRID AND 1994 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

2390-002 1=1 07-27-00 RCW 2390.00001 JAP

Exide Technologies - Vernon, California

FACILITY LOCATION MAP

FIGURE 1



450-317 1=100 cx4 10-17-00 NBM 490.40535 IAP Part B 2000

Exide Corporation - Vernon, California

SITE LAYOUT

FIGURE 2

A personnel training plan that includes instruction in safe work standards and emergency response training, together with a comprehensive inspection schedule, minimizes the potential for emergency situations. In the event a situation does arise which requires emergency response, the procedures described in the contingency plan will be followed.

The role of the Emergency Coordinator is to direct and manage all of the necessary response actions prior to, during, and after an emergency requiring the activation of the Contingency Plan. The Emergency Coordinator or his designee is responsible for calling to obtain emergency assistance from local police departments, fire departments or local or State emergency response teams when the Contingency Plan is implemented.

The facility is equipped with the following equipment:

(a) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal to facility personnel). Currently, voice communication is the method employed. The employee first discovering an injury, spill , release or threatened release, fire or explosion, immediately communicates with nearby co-workers and informs the area supervisor.

(b) A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or emergency response teams. Each department within the plant has a control room. Every control room is equipped with a telephone which is used for internal and external communications. Telephones are maintained at easily accessible locations within the plant including:

- Administrative Building
- Guardhouse
- Laboratory
- Smelting Building
- Refinery
- Garage
- Scalehouse
- Maintenance Shop
- RMPS

Additionally, twenty hand-held two-way radios are maintained at the facility. These radios allow internal communication within the plant at all times. The following departments are assigned radios:

- Security
- Shipping
- Receiving
- Baghouse
- Wastewater Treatment
- Laboratory
- Maintenance Supervisor
- Maintenance Mechanical

- Plant Services
- 1420
- Maintenance Electrical
- RMPS

(c) Portable fire extinguishers, fire control equipment (including special extinguishing agents such as foam, inert gas, or dry chemicals), spill control equipment and decontamination equipment. The location, size, and type of fire extinguishers maintained at the facility are along with plant maps showing their locations are presented in **Figure B-1** of **Appendix B**. Emergency eye wash and shower locations are presented in **Figure B-1**. The facility's mobile equipment is listed in **Table B-3**. Equipment from this list may be used for on site emergency response as necessary. **Figure B-1** also indicates the onsite locations of other miscellaneous equipment available for emergency response including:

- On-site fire hydrants (5)
- Off-site fire hydrants (4)
- Fire hoses (7) for general fire fighting
- Spill Kits (5) (small hand tools and materials for spill containment/clean up)
- Soda ash for acid neutralization

Table B-5 lists outside sources of equipment and materials that might be required during an emergency.

(d) Fire protection water is supplied at adequate volume and pressure to supply hose streams, foam producing equipment, automatic sprinklers or water spray systems. The four fire hydrants and the hose reels located onsite are shown on **Figure B-1**.

The location and a physical description of all emergency equipment at the facility and a brief outline of its capabilities is summarized in **Table B-6**.

All communication and alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure its proper operation in time of emergency. Inspection of fire extinguishers is performed monthly by an independent contractor.

The facility maintains a basic inventory of first aid supplies, emergency stretches, and associated equipment for minor injuries. In cases of serious injury, the emergency coordinator will call the local emergency medical response team, and direct plant employees to stabilize the injured person waiting for the medical response team.

3.2 Access to Communications or Alarm Systems

All personnel involved in operations where hazardous materials, hazardous wastes, or equipment used for handling these substances are encountered have immediate access for emergency communication through visual or voice contact with another employee. Closed circuit televisions in the control rooms are also used to observe personnel engaged in hazardous operations.

In the unlikely event there is only one employee on the premises while the facility is operating, he/she shall have immediate access to a device, such as a telephone, capable of summoning external emergency assistance.

3.3 Required Aisle Space

Aisle space is maintained during normal operations and allows for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the plant operation in an emergency. Plant traffic patterns are shown in **Figure B-2**.

3.4 Arrangements with Local Authorities

Vernon is required to make an attempt to arrange for response services from the police, local fire departments, emergency response teams, and local Publicly Owned Treatment Works (POTW). These services include response actions and support services during an emergency which requires the activation of the Contingency Plan. The following information must be communicated to the local authorities:

- Physical layout of the plant-location of hazardous materials and hazardous waste operations at the plant.
- Review the properties of the types of hazardous materials/wastes handled at the plant and associated hazards.
- Location of all production areas and/or other areas where people work.
- Entrances and layout of roads inside the plant.
- Evacuation routes for the plant and the assembly areas for personnel.

As appropriate for this facility and the potential need for the services of these organizations, the following arrangements have been made:

(1) Arrangements to familiarize police, fire departments, emergency response teams, and the local Office of Emergency Services with the layout of the facility, properties of hazardous materials/wastes handled at the facility and other associated hazards, places where facility personnel would normally be working, entrances to and traffic patterns inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with state emergency response teams, emergency response contractors, and equipment suppliers;

(4) Arrangements to familiarize local hospitals with the properties of hazardous materials/wastes handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

A copy of the letter sent out to the above described entities is presented in **Appendix F**. Past correspondence with local authorities is available at the plant.

4.0 CONTINGENCY PLAN

The purpose of this Contingency Plan is to provide a plan of actions that can be used in response to emergencies. The objective of implementation of the Contingency Plan is to minimize the hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous material/waste to air, soil, or surface water. This Contingency Plan is designed to meet the regulatory requirements of Title 22 CCR 66264 and 40 CFR 264 Subpart D.

4.1 Contingency Plan Implementation

The procedures contained in this Contingency Plan will be carried out immediately whenever there is a fire, explosion, or release that could threaten human health and the environment. There are minor emergency situations that occur during production and manufacturing operations that may or may not require the activation of this plan.

The release of small quantities of process materials, reagents, or hazardous material/waste from plant areas that **do not pose** a potential for fire, explosion, off-site run-off, groundwater contamination and can be cleaned up using routine procedures, **will not cause** the Contingency Plan to be activated. In cases where chemicals are spilled outside of buildings in quantities less than the reportable quantity (RQ) and the spill is contained on-site, the Contingency Plan **will not** be activated. The emergency procedures presented in this Crisis Management Plan/Contingency Plan should be used to mitigate minor emergencies that do not require Contingency Plan activation.

4.2 Responses to Emergencies

The Contingency Plan will be activated in case the emergency is a fire, explosion, or release of hazardous waste/material of sufficient magnitude to threaten human health and the environment. This section of the Crisis Management Plan/Contingency Plan is used as a general guide to emergency response actions. The **Response Guides** section of this plan presents emergency action guidelines for incidents that can occur at this plant. The following response actions can serve as generic response methods to be performed during significant emergencies:

> *Fires and Explosions* — When a fire or explosion is observed onsite, employees shall notify an authorized supervisor. The supervisor will call the Emergency Coordinator (EC) to assess the situation. If the fire requires more than two fire extinguishers to be used or if an explosion is not contained, then the EC shall activate the Contingency Plan by contacting 911 to notify City of Vernon Fire and Rescue. The EC will coordinate subsequent response activities and any necessary process shut-downs.

Train Derailment — In the event a train derailment impacts the facility, employees should remain in their work areas unless directed to do so by the EC or area supervisor. The EC shall be notified and will implement the contingency plan as necessary in response to the level of plant disruption due to the accident. Potential emergency scenarios include injuries, damage to buildings and other onsite structures, fire, power supply disruption, and the possible release of hazardous materials/wastes if a rail car or debris impacts a tank, bag house, storage area, pipeline, etc.

Acid Spills — If an acid spill is detected, employees shall inform an authorized supervisor, who will then notify the EC of the situation. Initial response actions by employees using appropriate personal protective equipment should be directed at stopping any acid flows from the contributing sources and containing the released material, if possible and safe to do so. The EC shall make emergency notifications as necessary, and direct and coordinate the efforts to contain, collect, neutralize, and dispose of the recovered materials.

Regulated Tank Leak or Failure — In the event of a leak or failure of a tank onsite, employees shall contact an authorized shift supervisor and the EC. Emergency responders using appropriate personal protective equipment should stop the flow of product, and work to contain the spill to minimize the area of impact. The tank should be immediately taken off line, and downstream processes supplied by it, or upstream processes contributing to it should be shut down (or process flows diverted to or from backup or redundant tanks). The EC shall make emergency notifications as necessary, and direct and coordinate the efforts to contain, collect, neutralize, and dispose of the recovered materials.

Hazardous Material/Waste Spills — For hazardous material/waste spills or overflows of hazardous liquids, employees shall notify an authorized supervisor of the emergency. The supervisor will contact the EC and provide him/her with the facts necessary to assess the situation. If a spill or overflow cannot be contained on-site, or if a hazardous liquid overflows emergency containment prior to on-site treatment, the EC will activate the Contingency Plan and direct response efforts to mitigate the incident. The EC shall contact 911, other emergency agencies, and response contractors as necessary to provide emergency response assistance and provide necessary spill notifications to the appropriate government agencies (including the local POTW and sanitation district if sewer or storm drainage systems are or may be impacted). The EC shall also oversee the proper handling and disposal of recovered or treated hazardous wastes, materials, or residues.

Oil Spills — Petroleum products such as vehicle fuel leaks or fuel oil delivery leaks should be controlled in an appropriate manner to prevent discharges to air,

soil, and water. Detailed procedures for handling oil spills at this facility are included in the Spill Prevention Control and Countermeasures (SPCC) Plan maintained separately from this document.

Electrical Failures — Electrical failures will be reported by employees to their supervisor. The supervisor will call maintenance regarding the cause of the power outage. If electrical outage is area wide or plant-wide, the supervisor will call the EC who will determine if outage is significant. The EC or designated employee will call the electric company to determine if the duration of the electrical outage is predicted to be longer than two hours or the cause of the outage cannot be fixed quickly. If the duration of the electrical outage is longer than two hours, the EC will either arrange for long-term emergency back-up electrical power, initiate process shut-down procedures, direct any necessary plant-area evacuations, and call 911 to obtain additional assistance, if required.

Gas Leaks — If a natural gas leak is detected, the employee will call an authorized supervisor. The supervisor will call maintenance. Maintenance will shut off the service to and isolate the area. The area will be tested for explosivity by calibrated portable meters. If the meter indicates high gas levels, higher than methane (propane, if used) Lower Explosive Limit (LEL), the area will be isolated and the maintenance supervisor will call the EC and communicate event details. The EC will activate the Contingency Plan if the gas concentration does not return to normal background levels in ten minutes.

If there is a service outage, the employee will call an authorized supervisor. The supervisor will call maintenance to shut off the service main to plant and call the EC. The EC will work with the gas company to resolve the gas outage. During the event, the EC will direct maintenance personnel to monitor natural gas pipe lines, gas fired equipment, burners, and associated systems. The EC will coordinate plant process shut-downs (where necessary) and subsequent start-up operations after the gas service interruption.

Sewer/Wastewater Overflows — If a sewer or wastewater overflow is observed, the employee will call the shift supervisor. The supervisor will call the EC and give details of the event. If the sewerage or wastewater is going off-site then the Contingency Plan will be activated. The EC will coordinate subsequent activities necessary to mitigate the incident.

Serious Health Injuries — For serious health injuries including heart attacks, strokes, and fatalities, the employee will call the supervisor. The supervisor will call 911 and the EC to communicate the status of the situation. The EC will advise the supervisor or designated person to watch injured person and wait for emergency medical responders. The EC will coordinate the additional response and follow-up activities.

Natural Disasters — For natural disasters, the EC and/or designated employee will monitor weather reports to assess the magnitude of the weather.

Floods — For floods, the plant's lower elevations or flood-prone areas will be monitored, and required diking and stabilization of perimeter walls or drainage channels will be performed; the EC will activate the Contingency Plan if an operation area, utility area, water supply/water treatment area is flooded.

Earthquakes — After the initial shock, the EC on site shall monitor the situation and give the evacuation signal when the immediate threat of aftershocks has passed. After the plant is evacuated, the EC will implement the contingency plan as necessary (and to the extent possible if it is deemed unsafe to re-enter the plant). Utility feeds (gas, water, and electricity) to the facility should be shut off if there is evidence that the lines have been damaged or if this action is requested by local emergency management agencies.

Public Disturbance / Riot — In the event of a civil disturbance outside or near the facility, employees should lock outside entrances to buildings and secure the facility perimeter (close/lock gates, etc.). Remain inside the plant and continue normal work activities. If the situation warrants, the EC may order process shut downs as necessary. Personnel should not leave the facility until permitted to do so by the EC or a plant supervisor.

Internal Labor Disputes / Strikes — The main threat to the facility during a labor dispute is sabotage or vandalism. Plant management and non-striking employees should initiate the orderly shut down of non-critical or threatened plant processes, and these areas should be secured and monitored by plant security. The plant as a whole and any processes still in production should also be protected, and employees should be on the alert for potential problems. The EC shall implement the contingency plan as necessary in response to any emergency situation that might arise.

Other Events — For events including bomb threats, vandalism, and sabotage - the employee will report the incident to the supervisor. The supervisor will notify the EC, who will collect the facts and determine if the Contingency Plan should be activated.

In events involving natural gas, liquefied petroleum gas, or compressed propane gas, the response action should be performed in accordance with the vendor's/supplier's directions and with assistance from the local fire department.

Specific actions to be performed by employees in different plant areas during an emergency that might require Contingency Plan implementation are presented in **Section 7.6**.

4.3 Evacuation Plan

Any evacuation of the facility will be by the normal emergency evacuation procedures as posted within plant buildings. This plan includes evacuation procedures for all areas of the plant whether or not they are involved in hazardous operations. The plant-wide evacuation route plan for the facility is shown in **Figure 3**. All personnel located south and immediately north of the railroad tracks will evacuate the facility and meet at the Administrative Building parking lot for roll call. All remaining personnel located north of the railroad tracks will evacuate the facility through the 26th Street gate and travel toward the Administrative Building parking lot for roll call. Evacuation maps for specific plant areas are included in **Appendix C** of this plan.

Each of the area evacuation plans denotes both primary and secondary evacuation routes for use in the event that fire or hazardous material/waste blocks the primary routes. Should evacuation of any building be required, all evacuated personnel will move to a designated assembly point away from the location of the emergency.

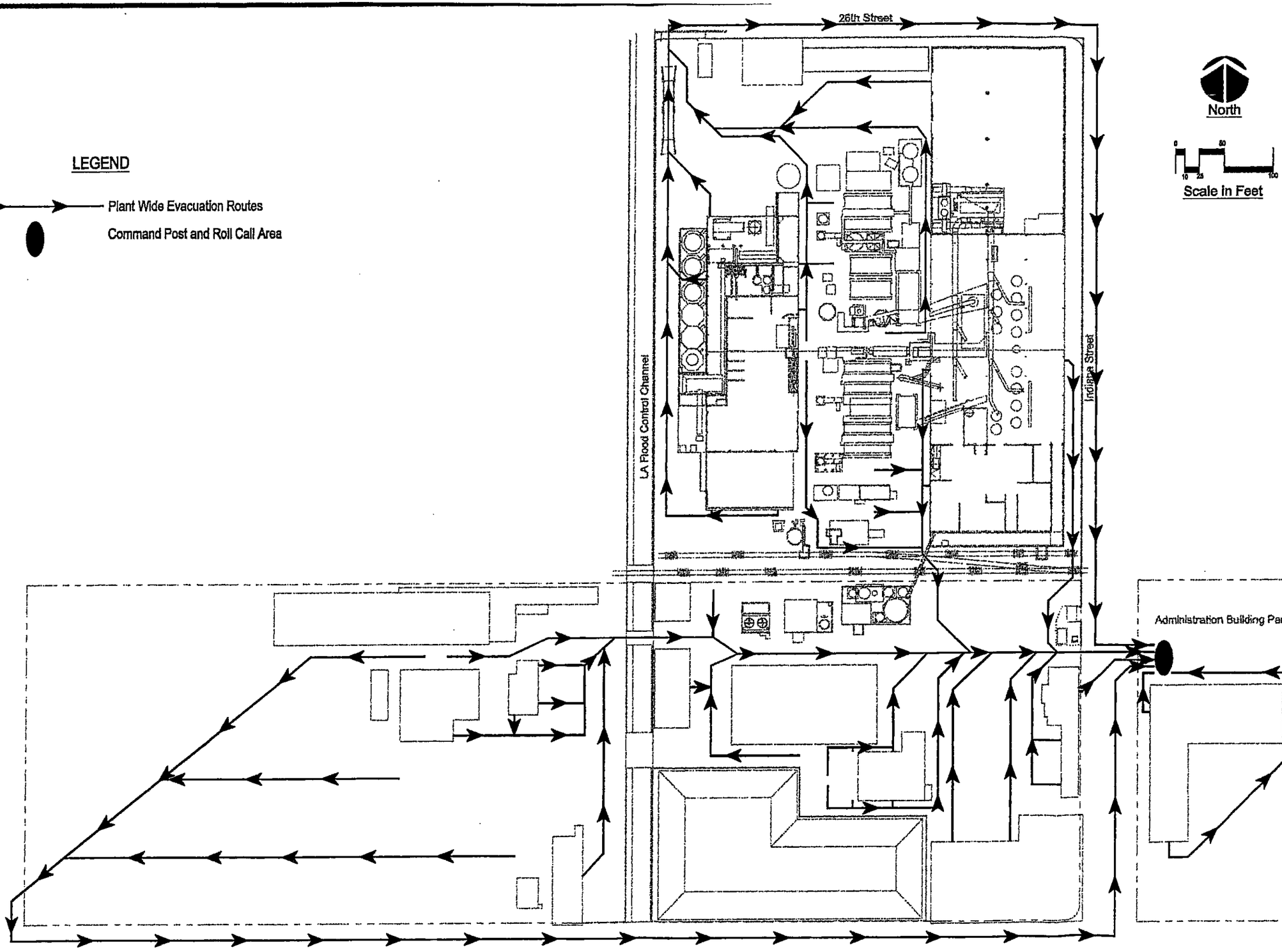
The signal to start any evacuation shall be given by the shift supervisor and/or the Emergency Coordinator. The signal to begin an evacuation will be transmitted by direct verbal communication or by two-way radios to supervisors in each production area.

If it is unclear whether or not to evacuate a particular area, the area should be evacuated until the Emergency Coordinator makes a determination. Any evacuation of the surrounding properties will be coordinated through the local fire and police departments.

LEGEND

Plant Wide Evacuation Routes

Command Post and Roll Call Area



North

0 50 10 25 100

Scale in Feet

490-316 1=100 cd/regen 10-17-00 RBM 490.40556 JAP Part B 2000

Exide Corporation - Vernon, California

PLANT WIDE EVACUATION ROUTE PLAN

FIGURE 3

5.0 COPIES AND AMENDMENT OF CONTINGENCY PLAN

A copy of the Contingency Plan and all revisions must be kept at the plant and submitted to all police departments, fire departments, hospitals, and State and local emergency response teams that can be called to provide emergency services.

A copy of the contingency plan and all revisions shall be maintained at the facility in the following locations:

1. Environmental Manager's Office
2. Health & Safety Manager's Office
3. Guardhouse
4. Maintenance Office
5. RMPS Control Room

Stand alone copies of the "Action Package" are maintained in the following locations:

Smelting Building
Refinery
RMPS
Wastewater Treatment Building
Administrative Building
Garage
Maintenance Shop
Employee Facilities

A copy of the contingency plan will also be maintained at the office and home of the Emergency Coordinator, all alternates, and Shift Supervisors as listed in **Table 1** and **Table 2**.

This Crisis Management/Contingency Plan is a dynamic document. This plan is required by the regulations to be reviewed and amended, if necessary, whenever:

(a) The facility permit is revised.

(b) Applicable regulations are revised when the facility is an interim status facility.

(c) The plan fails in an emergency.

(d) The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, process upsets, or releases of hazardous waste or hazardous materials, or changes the response necessary in an emergency.

(e) The list of emergency coordinators changes.

(f) The list of emergency equipment changes.

Exide Technologies reserves the right to amend this plan by change, by addition, or by deletion whenever so desired. The plan will be amended, as required, to remain current with any revision of applicable regulations. Once amended, the revised Contingency Plan must be distributed to designated employees and to all police departments, fire departments, hospitals, and State and local emergency response teams that can be called to provide emergency services. The plant manager has responsibility for assuring revisions to the contingency plan are made and distributed.

Each time this plan is significantly amended, new documentation attesting to distribution of the change will be maintained. Copies of the distribution/submittal letters and written responses are maintained with the master copy of this plan at the site.

A record of plan revisions will be kept by updating the plan **Revisions Log** in **Appendix G**, and distribution of significant revisions will be recorded in the **Plan Distribution Record** at **Section 2.1**.

6.0 EMERGENCY COORDINATOR

An up-to-date list of the names, addresses and phone numbers (office and home) of all persons qualified to act as Emergency Coordinators is presented in **Table 2**. The primary EC is designated on a weekly "on call" rotation. Copies of the monthly on-call roster are maintained at CP1, CP2, CP3, and at the guard gate.

At all times there shall be at least one employee, either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time), with the responsibility for coordinating all emergency response measures. The individuals listed on **Table 2** are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of materials and wastes handled, the location of all records within the facility, and the facility layout. In addition, these persons have the authority to commit the resources needed to carry out the contingency plan.

Table 2: Emergency Coordinators and Alternates

Emergency Coordinators and Alternates			
Name, Title, Address	**Telephone Numbers**		
	Plant	**Cellular**	**Home**
John Hogarth Plant Manager	(323) 262-1101 **EXT. 275**	(323) 395 6130	(626) 345 5008
Nicolas Serieys Interim Environmental Manager	(323) 262-1101 **EXT. 259**	(310) 909-3884	
Rafael Perez Operations Manager	(323) 262-1101 **EXT. 241**	(818) 974-5358	
John Martinez Maintenance Supervisor	(323) 262-1101 **EXT. 226**	(323) 203 8864	(909) 923 4239
Claudia Caneo Health & Safety Manager	(323) 262-1101 **EXT. 276**	(323) 828-0875	
Mamun Hossain Materials Manager	(323) 262-1101 EXT.211	(323) 816 3508	

The facility shift supervisors are listed in **Table 3**. At least one of the employees on this list will be onsite at all times to help coordinate an immediate emergency response at the direction of the EC.

Table 3: Authorized Shift Supervisors (Onsite Coordinators)

Authorized Shift Supervisors (Onsite Coordinators)			
Name, Title	**Telephone Numbers**		
	Plant	**Cellular**	**Home**
Art Vasquez Smelting & Refining Manager	(323) 262-1101 **EXT. 286**	(626) 991 0755	
Lorenzo Carlos Shift Supervisor	(323) 262-1101 **EXT. 286**	(323) 216 9033	
Marshall Pitts Shift Supervisor	(323) 262-1101 **EXT. 286**		

7.0 EMERGENCY PROCEDURES

These response procedures may be used at any time there is an emergency. The Contingency Plan does not have to be activated to use the emergency response guides presented in **Section 7.2**. A list of MSDSs kept on site for chemicals used at the plant are presented in **Appendix D**.

7.1 General Emergency Procedures

The provisions of the plan shall be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous materials which could threaten human health or the environment. The **Response Guides** section at the end of this plan presents specific emergency procedures for particular events.

The employee first discovering an injury, spill or release (including a leaking tank or pipe, overflow incident, or breach of containment systems), fire or explosion, should immediately verbally communicate with nearby co-workers and inform the Shift Supervisor. The employee shall make no attempt to correct an out-of-control situation while alone. Plant personnel have been instructed to alert the Shift Supervisor immediately whenever a potential, imminent, or actual emergency situation is observed. The Shift Supervisor will activate the internal facility alarm or communication system (telephone, two-way radio). The Shift Supervisor will then call the Emergency Coordinator either directly through the plant telephone system or two-way radio, or by calling the guard at the main gate. Employees designated to remain in the area of an emergency should do so only so long as it takes to secure critical operations before evacuating the area. All other employees:

1. Will discontinue operating any equipment or machinery and ensure that the equipment or machinery is in the "STOP" or "OFF" position.
2. Will exit through the nearest available exit in an orderly manner and assemble in the pre-designated roll-call area.
3. Will not return to the scene of the emergency until the all clear sign is given. Employees may only remain in the area if requested to do so by the Shift Supervisor in charge.

Evacuation routes, specific shut-down procedures, roll-call areas, and specific personnel roles are detailed by department in the following sections. Departmental emergency action plans are maintained individually in each department. Employees designated to remain at the scene to secure operations should only do so if there is not an immediate threat to life or health. These individuals have been trained in general first aid and in CPR. The Emergency Coordinator, Shift Supervisor, or their designee must perform the following tasks:

1. Notify the Emergency Coordinator, appropriate authorities as necessary (Fire Dept., Police, Paramedics, etc.), and other facility personnel as appropriate.

2. Ensure that all personnel which have not been designated to remain have been evacuated from the scene of the emergency.

3. Assist any individuals that require help.

Once everyone has been safely evacuated, all personnel will meet at the designated roll-call area to account for everyone from that department. Any casualties will be identified and first aid rendered as soon as possible. Entrance into the affected area will be restricted to those persons equipped with proper protective gear. Only those persons responding to the emergency will be allowed in the area.

The Emergency Response Coordinator is responsible for coordinating all activities necessary to the handling of emergency situations in an efficient and timely manner when the Contingency Plan is activated. **Appendix C** contains the evacuation routes for the plant. Administration forms for spills notification, lost-time incident report, corporate incident report, and executive inspection checklist are provided in **Appendix E**.

The EC is also responsible for ensuring that proper PERSONAL PROTECTIVE EQUIPMENT is worn by employees conducting activities necessary to handle the emergency. The emergency response personnel should be prepared for "worst case conditions."

7.2 Emergency Procedures for the Emergency Coordinator

When there is a minor emergency situation, the emergency procedures in the Crisis Management Plan/Contingency Plan can be used to mitigate the incident without formally implementing this plan. If conditions arise that require the implementation of the Contingency Plan, the Emergency Coordinator or his designee must:

- Activate internal communication systems and notify all plant personnel;
- Notify appropriate State or local response agencies with designated and assigned responsibilities if their assistance is needed;
- Identify the character, source, amount, an areal extent of any released materials;
- Assess potential hazards to human health or the environment that may result from the emergency;
- Report the emergency if it is determined that conditions exist that have or may threaten human health and the environment by providing verbal notification of the situation to the local emergency administering agency, the state Office of Emergency Services, and the National Response

Center (NRC) or the governmental official acting as the federal on-scene coordinator for the region;

- Report releases greater than reportable quantities of any chemical or hazardous material/waste for which release reporting is required to the California Office or Emergency Services and the National Response Center.
- Perform necessary actions to ensure fires, explosions and releases do not occur, recur, or spread;
- Monitor plant for leaks, pressure build-up, gas generation, ruptures in pipes and tanks, or other equipment if the plant stops operation due to fire, explosion, or release;
- Perform necessary post emergency actions to manage waste residues that result from the emergency;
- Perform required post emergency actions to ensure against waste incompatibilities with the released material, and ensure all emergency equipment listed in the plan is cleaned and ready for use before resuming operations;
- Notify the Director at the CA EPA and local authorities that the plant has completed the post emergency actions in affected areas prior to resuming operations;
- Generate a report of the emergency for the plant operating record (if the emergency required implementation of the Contingency Plan);
- Prepare and submit Corporate Incident and Lost Time Incident Reports as applicable
- Submit a report to the CA EPA within 15 days of the incident (if it required implementation of the Contingency Plan; and
- Submit a report to the California Chemical Emergency Planning and Response Commission (CEPRC) within 30 days of the incident (if any chemical was released in excess of its reportable quantity).

If the Emergency Coordinator determines that evacuation of local areas near the plant may be necessary, local emergency authorities will be notified. The EC will be available to assist local officials in the determination of the areas to be evacuated.

Verbal notification of any release or threatened release of a hazardous waste or hazardous material must be made as soon as:

a. A person has knowledge of the release or threatened release of a reportable quantity of a chemical or hazardous material/waste;
b. notification can be provided without impeding immediate control of the release or threatened release; and
c. notification can be provided without impeding immediate emergency medical procedures.

This verbal notification must be provided to each of the following agencies:

- City of Vernon CUPA at (323) 583-8811
- Local Emergency Response Administering Agency at (323) 583-4821
- California State Warning Center at 1-800-852-7550 or 1-916-845-8911; and
- National Response Center at 1-800-424-8802 (or the government official designated as the on-scene coordinator for the area).

The information that must be reported includes:

- The exact location of the release or threatened release,
- Name and telephone number of the reporter (caller),
- Name and address of the plant,
- Name and quantity of the hazardous material/waste(s) involved to the extent known at the time of the call,
- Extent of injuries, and
- Possible hazards to human health and the environment by the hazardous material/waste involved in the release or threatened release.

A form for collecting the above information is included in **Appendix E**.

The National Response Center (NRC) will provide an incident number, the name of the NRC officer that received the information, and the time recorded when the information was received. The Emergency Coordinator must record this information in the operating record to document the NRC notification (or the on-scene coordinator notification).

Similar information should be recorded if it is supplied during notifications to the California Office of Emergency Services and the Local Emergency Response Administering Agency.

If the emergency causes the generation of hazardous residues, these residues must be managed in accordance with applicable waste regulations. The hazardous waste regulations are always in effect whether or not the Contingency Plan is activated.

The owner or operator of the plant must record the time, date, and details of any incident that requires implementing the Contingency Plan. Within 15 days of the incident, the owner or operator must also submit a written report to the California EPA. The report must include the following:

- Name, address, and telephone number of the owner or operator
- Name, address, and telephone number of the plant
- Date, time, and type of incident (spill, fire, explosion, etc.)

- Name and quantity of materials involved
- The extent of injuries, if applicable
- Assessment of actual or potential hazards to human health or the environment, where this is applicable
- Estimated quantity and disposition of recovered material that resulted from the incident

A form for collecting and submitting the above information is included in **Appendix E**.

Written follow-up notification must also be sent to the California Chemical Emergency Planning and Response Commission within 30 days of any non-permitted release of a reportable quantity of a chemical that requires release reporting. The required information must be submitted on the appropriate reporting form. A copy of this form and its instructions are included in **Appendix E**.

If the Contingency Plan was implemented, the plant management will generate an operating record that contains the time, date, and details of the incident. If there was no implementation of the Contingency Plan, there is **no regulatory requirement** for a record to be entered into the operating record. However, the Emergency Coordinator will check with Corporate Environmental Management/Health & Safety to determine if a record of the event should be generated.

Notifications of spills, lost time, and other health and safety incidents must be provided internally to corporate management. **Appendix E** includes a Spill Notification Form, a Lost Time Incident Report, and a Corporate Incident Report that must be completed, as applicable, after an emergency situation has occurred at the plant.

7.3 Post Emergency Procedures

Immediately after an emergency, the Emergency Coordinator shall provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. He/she will determine the optimum cleanup techniques such as neutralization, absorption, mechanical removal, etc. Cleanup efforts will also be monitored by the Emergency Coordinator.

The Emergency Coordinator shall ensure that, in the affected area(s) of the facility:

1. No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed. During an emergency situation, the Emergency Coordinator will also ensure that, reactive materials stored in the vicinity the affected area(s) of the facility will be properly segregated and protected throughout response and

cleanup procedures. See **Figure B-3** in **Appendix B** for the locations of these chemicals. Note that several water reactive chemicals are used at this facility and that special precautions may be necessary to protect them during cleanup activities.

2. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

Any emergency equipment that has been utilized during an emergency response at the facility will be cleaned and made fit for its intended use before operations resume. This includes, where necessary, wash down of mobile equipment at the wash pit location noted on **Figure 2**. This wash down location has a sump and will capture and route the rinsate to the wastewater treatment facility. Mobile equipment used during an emergency response will be washed down at the new truck wash station after it is constructed. Additional post emergency response activities include, where necessary, recharge or replacement of fire extinguishers, repair of earth moving equipment, cleaning and replacing fire fighting equipment to its proper storage area, restocking emergency medical kits, and the restocking of absorbent material and neutralization chemicals.

The facility shall notify the California Department of Toxic Substances Control and appropriate state and local authorities, that the facility is in compliance with paragraphs (1) and (2) above before operations are resumed. EXIDE TECHNOLOGIES shall note in its operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, the facility shall submit a written report on the incident to the CA EPA. The report shall include at a minimum the information listed in the CA EPA reporting form presented in **Appendix E**.

If control of the situation did NOT require the formal implementation of this plan, and NO telephone notifications were made advising of a possible incident, no record of the situation is required to be included in the plant files.

There are other reporting requirements to which the plant is subject, including those of the South Coast Air Quality Management District (SCAQMD).

7.4 Emergency Protocols in Non-Critical Plant Areas

The following positions for specific areas of the plant are designated as non-critical during an emergency (maps referenced as **Figures C-1 to C-14** are located in **Appendix C**):

- Blast Furnace Department (**Figure C-1**): Blast Charge Maker and Utility.
- Reverb Furnace Department (**Figure C-2**): Reverb Charge Maker and Utility.

- Refining Area (**Figure C-3**): Forklift Operators, all Casters, Refining and Casting Helpers, and Utility.
- RMPS Area (**Figure C-4**): Forklift Operators, Filter Press Operator, RMPS Helper, and Utility.
- Baghouse Area (**Figures C-5 and C-6**): Utility and non-departmental personnel.
- Administrative Building (**Figure C-7**): Sales/Purchasing personnel, Secretaries/Accounting Personnel, and Training and Environmental Personnel.
- Garage Area (**Figure C-8**): Junior Mechanic and Utility.
- Maintenance Shop (**Figure C-9**): Electrician, Junior Mechanic, and Utility.
- Employee Facilities Area (**Figure C-10**): all non-critical personnel listed above.

During an emergency, the following procedures will be adhered to by those personnel holding non-critical positions:

1. Discontinue operating any equipment or machinery and ensure that controls are in the STOP or OFF position.

2. Ensure that all flowing slag and/or lead is contained or stopped (Blast and Reverb Furnace Departments, and Refining Area only).

3. Only remain in the area if requested to do so by the Emergency Coordinator or supervisor in charge.

4. Exit through the nearest available exit in an orderly manner. See appropriate figure in Appendix C (**Figures C-1** through **C-14)**.

5. Once you leave the building/area, do not re-enter the building/area until the all-clear sign is given.

Once everyone has been safely evacuated, all personnel will meet at the Administrative Building parking lot for roll call.

7.5 Emergency Protocols in Critical Plant Areas

The following positions for specific areas of the plant are assigned to personnel responsible for critical operations during an emergency (maps referenced as **Figures C-1** to **C-14** are located in **Appendix C**):

- Blast Furnace Department (**Figure C-1**): Shift Supervisor and Blast Furnace Operator.

- Reverb Furnace Department (**Figure C-2**): Shift Supervisor and Reverb Furnace Operator.
- Refining Area (**Figure C-3**): Shift Supervisor, Leadman, Soft Lead and Hard Lead Refiner, and Assistant Refiner.
- RMPS Area (**Figure C-4**): Shift Supervisor, RMPS Operator, and RMPS Assistant Operator.
- Baghouse Area (**Figures C-5 and C-6**): Shift Supervisor, Environmental Operator, and Environmental Operator Leadman (if on day shift).
- Administrative Building (**Figure C-7**): Plant Manager, Regional Controller, Plant Superintendent, Maintenance Superintendent, and Assistant Maintenance Superintendent.
- Employee Facilities Area (**Figure C-10**): Leadman, Respirator Cleaner, and Sweeper Operator.
- Maintenance Shop (**Figure C-13**): Shift Supervisor, Pump Repairman, and Machinist.
- Garage Area (**Figure C-14**): Shift Supervisor, Leadman, and Senior Mechanic.

During an emergency, the following procedures will be adhered to by those personnel responsible for critical operations:

1. Notify the guard to call appropriate authorities, as necessary (Fire Department, Police/Sheriff Department, Paramedics, etc.).

2. Ensure that all non-critical personnel evacuate the building/area.

3. Drain the slag (Blast Furnace Department only) or stop the flow of slag (Reverb Furnace Department only).

4. Turn OFF the following pieces of equipment or machinery for specific areas:

Blast Furnace Department
- Root Blower
- Afterburner
- Afterburner Blower
- Skip Hoist (after lowering)
- fire on Kettles A and B

Reverb Furnace Department
- Reverb Burners
- Reverb Blowers
- fire on Kettles E, F, and G

Refining Area
- all kettles and fires

Axial Fan
agitators (disconnect after turning OFF)
all pumps

RMPS Area
all conveyors and screws
Hammer Mill
Pisquat
Trommel
Filter Press
all pumps
all other moving equipment or machinery

Baghouse Area
affected baghouses (close dampers after turning off)

5. Secure chemicals including sulfur and calcium (Refining Area only).

6. Assist individuals requiring help.

7. Evacuate through the nearest accessible exit.

Once everyone has been safely evacuated, all personnel will meet at the Administrative Building parking lot for roll call.

7.6 Emergency Response Actions for Specific Plant Areas

The following guidelines list the emergency actions that should be performed by facility employees in different plant areas. These response actions are intended to protect human health and the environment from a release, fire, explosion, or other crisis that may occur onsite. These guidelines can be used in every emergency whether or not the Contingency Plan is activated.

7.6.1 Baghouse Area

Utility Workers:

1. Discontinue operating any equipment or machinery and insure that controls are in the STOP or OFF position.

2. Only remain in the area if instructed to do so by the Emergency Coordinator or designee.

3. Evacuate through nearest accessible exit in an orderly manner. Report to the designated staging area. Once everyone has been safely evacuated, all associates will meet outside for a head count.

4. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

Environmental Operator, Environmental Operator Leadman, and/or Supervisor:

1. Notify the guard to call the Emergency Coordinator.

2. Ensure that all "non-critical" associate evacuate.

3. Turn OFF affected baghouses and close dampers.

4. Assist associates requiring help.

5. Evacuate through nearest accessible exit in an orderly manner. Report to the designated staging area. Once everyone has been safely evacuated, all associates will meet outside for a head count.

6. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

7. Report all actions taken to Emergency Coordinator or designee.

7.6.2 Blast Furnace Department

Blast Charge Maker and/or Utility Operator:

1. Discontinue operating any equipment or machinery and ensure that controls are in the STOP or OFF position.

2. Ensure that all flowing slag and/or lead is contained or stopped.

3. Only remain in the area if instructed to do so by the Emergency Coordinator or designee.

4. Exit through the nearest available exit in an orderly manner. Report to designated staging area.

5. Once you exit the building, do not re-enter the building unless instructed to do so by the Emergency Coordinator or designee.

Blast Furnace Operator and/or Shift Supervisor:

1. Notify the guard to call the Emergency Coordinator.

2. Ensure that all "non-critical" associates evacuate the area.

3. Drain the slag.

4. Turn OFF the:
   - ☐ Root Blower
   - ☐ Afterburner
   - ☐ Afterburner Blower

5. Lower skip hoist and turn it OFF.

6. Turn OFF the fire on Kettles A and B.

7. Assist associates requiring help.

8. Evacuate through nearest available exit in an orderly manner. Report to the designated staging area. Once everyone has been safely evacuated, all associates are to meet outside for a head count.

9. Once you exit the building, do not re-enter the building until instructed to do so by the Emergency Coordinator or designee.

10. Report all action taken to Emergency Coordinator or designee.

7.6.3 Reverb Furnace Department

Reverb Charge Maker and/or Utility Operator:

1. Discontinue operating any equipment or machinery and insure that controls are in the STOP or OFF position.

2. Ensure that all flowing slag and/or lead is contained or stopped.

3. Only remain in the area if instructed to do so by the Site Crisis Response Commander or designee.

4. Exit through the nearest available exit in an orderly manner. Report to designated staging area.

5. Once you exit the building, do not re-enter the building until instructed to do so by the Emergency Coordinator or designee.

Reverb Furnace Operator and/or Shift Supervisor:

1. Notify the guard to call Emergency Coordinator.

2. Ensure that all "non-critical" associates evacuate the area.

3. Stop the flow of slag.

4. Turn OFF the:
   ☐ Reverb Burners
   ☐ Reverb Blowers

5. Turn OFF fire on Kettles, E, F, and G.

6. Assist associates requiring help.

7. Evacuate through nearest available exit in an orderly manner. Report to the designated staging area. Once everyone has been safely evacuated, all associates will meet outside for a head count.

8. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

9. Report all actions taken to Emergency Coordinator or designee.

7.6.4 Refining Area

Refining and Casting Helpers:

1. Discontinue operating any equipment or machinery and insure that controls are in the STOP or OFF position.

2. Ensure that all flowing slag and/or lead is contained or stopped.

3. Only remain in the area if instructed to do so by the Emergency Coordinator or designee.

4. Exit through the nearest available exit in an orderly manner. Report to designated staging area.

5. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

Leadman, Soft and Hard Lead Refiner, Assistant Refiner and/or Shift Supervisor:

1. Notify the guard to call Emergency Coordinator.

2. Ensure that all "non-critical" associates evacuate.

3. Turn OFF all kettles and fires.

4. Turn OFF axial fan.

5. Turn OFF and disconnect agitators.

6. Turn OFF all pumps.

7. Secure chemicals: sulfur, calcium.

8. Assist associates requiring help.

9. Evacuate through nearest available exit in an orderly manner. Report to the designated staging area. Once everyone has been safely evacuated, all associates will meet outside for a head count.

10. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

11. Report all actions taken to Emergency Coordinator or designee.

7.6.5 Raw Material Preparation System (RMPS) Area

Filter Press Operator, RMPS Helper, Utility Operator and/or Forklift Operator:

1. Discontinue operating any equipment or machinery and insure that controls are in the STOP or OFF position.

2. Only remain in the area if instructed to do so by the Emergency Coordinator or designee.

3. Evacuate through nearest available exit in an orderly manner. Report to designated staging area. Once everyone has been safely evacuated, all associates will meet outside at the scrubber for a head count.

4. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

RMPS Operator, Assistant RMPS Operator, and/or Shift Supervisor:

1. Notify the guard to call the Emergency Coordinator

2. Ensure that all "non-critical" associates evacuate.

3. Turn OFF all conveyors and screws.

4. Turn OFF the:
   hammermill, pisquat, trommel

5. Turn OFF the filter press, pumps, and all other moving equipment.

6. Assist associates requiring help.

7. Evacuate through nearest available exit in an orderly manner. Report to the designated staging area. Once everyone has been safely evacuated, all associates will meet outside for a head count.

8. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

9. Report all actions taken to Emergency Coordinator or designee.

7.6.6 Maintenance Area

Electrician, Junior Mechanic, and/or Utility Operator:

1. Discontinue operating any equipment or machinery and insure that controls are in the STOP or OFF position.

2. Only remain in the area if instructed to do so by the Emergency Coordinator or designee.

3. Evacuate through the nearest available exit in an orderly manner. Report to designated staging area.

4. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

Supervisor, Pump Repairman, and/or Machinist:

1. Notify the guard to call the Emergency Coordinator.

2. Ensure that all "non-critical" associates evacuate.

3. Assist associates requiring help.

4. Evacuate through nearest available exit in an orderly manner. Report to the designated staging area. Once everyone has been safely evacuated, all associates will meet outside for a head count.

5. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

6. Report all actions taken to Emergency Coordinator or designee.

7.6.7 Garage Area

Junior Mechanic, and/or Utility Worker:

1. Discontinue operating any equipment or machinery and insure that controls are in the STOP or OFF position.

2. Only remain in the area if instructed to do so by the Emergency Coordinator or designee.

3. Evacuate through the nearest available exit in an orderly manner. Report to designated staging area.

4. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

Supervisor and/or Senior Mechanic Lead:

1. Notify the guard to call the Emergency Coordinator.

2. Ensure that all "non-critical" personnel evacuate.

3. Assist associates requiring help.

4. Evacuate through the nearest available exit in an orderly manner. Report to the designated staging area. Once everyone has been safely evacuated, all associates will meet for a head count.

5. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

6. Report all actions taken to Emergency Coordinator or designee.

7.6.8 Plant Services Area

Utility Operator:

1. Discontinue operating any equipment or machinery and insure that controls are in the STOP or OFF position.

2. Only remain in the area if instructed to do so by the Emergency Coordinator or designee.

3. Evacuate through the nearest available exit in an orderly manner. Report to the designated staging area

4. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

Plant Services Lead, Respirator Control, and/or Sweeper Operator:

1. Notify the guard to call the Emergency Coordinator.

2. Ensure that all "non-critical" associates evacuate.

3. Assist associates requiring help.

4. Evacuate through the nearest available exit in an orderly manner. Report to the designated staging area. Once everyone has been safely evacuated, all associates will meet outside for a head count.

5. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee

6. Report all actions taken to Emergency Coordinator or designee.

7.6.9 Main Office

Sales/Purchasing, Secretaries/Accounting, Training and/or Environmental Personnel:

1. Discontinue operating any equipment or machinery and insure that controls are in the STOP or OFF position.

2. Only remain in the area if instructed to do so by the Emergency Coordinator or designee.

3. Evacuate through the nearest available exit in an orderly manner. Report to designated staging area.

4. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

Plant Manager, Controller, Plant Superintendent, Maintenance Manager:

1. Notify the guard to call the Emergency Coordinator.

2. Ensure that all "non-critical" personnel evacuate.

3. Assist individuals requiring help.

4. Evacuate through the nearest available exit in an orderly manner. Report to the designated staging area. Once everyone has been safely evacuated, all associates will meet for a head count.

5. Once you exit the building, do not re-enter the building until instructed to do so by the Site Crisis Commander or designee.

6. Report all actions taken to Emergency Coordinator or designee.

7.7 Specific Emergency Response Guides

The specific emergency response guides are the essential elements of response to specific emergencies. These guides can be used in every emergency whether or not the Contingency Plan is activated. Guidelines for responding to the following emergency scenarios are presented in the **Response Guides** section at the end of this plan.

- Fires — (Response Guide 1)
- Explosion/Plane Crash/Building Collapse — (Response Guide 2)
- Hazardous Material/Waste Spills — (Response Guides 3A-F, 4A-D)
- Utility Failures: electrical, natural gas, water— (Response Guides 5A-B)
- Wastewater Discharges and Treatment Plant Solids Spills — (Response Guides 5C-D)
- Earthquakes — (Response Guide 6)
- Bomb Threat — (Response Guide 7A)
- Public Disturbance/Riots — (Response Guide 7B)
- First Aid Procedures: injuries, heart attacks, strokes, and fatalities — (Response Guide 8)

8.0 ACTION PACKAGE FOR EMERGENCIES

This Crisis Management Plan/Contingency Plan has been designed to be regulatory document and is presented in a format similar to applicable RCRA regulations. A package of essential information needed during an emergency is presented as an "**Action Package**" located in **Appendix A** of this Contingency Plan. Copies of the Action Package are distributed throughout at the plant for quick reference during an emergency. The contents of the Action Package are as follows:

- General Plant Information
- Emergency Response Coordinators and Alternates, Government Agencies, List of Local Authorities (Support Services), Emergency Notification List, Additional Support Services, Medical Information and Media List, Plant Response Team, List of Authorized Emergency Supervisors, Response Technicians and First Aid Responders, EXIDE TECHNOLOGIES Environmental List, and RQ's for materials managed on-site
- Reporting Requirements for Spills
- Site Location and Topography
- Site and Vicinity Map
- Evacuation Routes
- Crisis Management Guide and Plan Elements
- Administrative Forms: NRC and CA EPA - Telephone Notification Report, State and Local Emergency Response Agency Report, and CA EPA Toxic Substances Control Department Report

The Action Package is a collection of necessary information that can be used effectively by the Emergency Coordinators or Shift Supervisors before, during, and after the implementation of the Contingency Plan. Proper use of the Action Package, however, requires the user to be thoroughly familiar with both the Vernon facility and the contents of the complete Crisis Management Plan/Contingency Plan document.

9.0 PERSONNEL TRAINING

Employees at Vernon facility participate in training program that teaches them to respond effectively to emergencies by providing training that includes a review of emergency procedures, emergency equipment - capabilities and locations, and emergency systems. Formal training is required by Title 22 CCR Section 66264.16, 29 CFR 1910.120, and 40 CFR 264.14 for personnel responsible for handling emergency situations involving hazardous wastes and hazardous materials. The following training topics should be reviewed, if applicable:

- Procedures for using, inspecting, replacing monitoring equipment
- Key parameters for automatic waste feed cut-off systems
- Communications and alarm systems
- Response to fires or explosions
- Response to groundwater contamination incidents
- Shut-down procedures for plant equipment and operations

Plant personnel must complete successfully the training program within six months of hiring with the facility or assignments to the plant or assignment to a new position at the plant, whichever is later. Personnel must not work in unsupervised positions until training is successfully completed. Plant personnel must participate in an annual review of their initial training. In accordance with applicable regulations, the plant management will document employee's name, job title, job description, and commensurate introductory and continuing personnel training given. The training records for current employees must be kept until plant closure. The training records for former employees must be kept for three years.

The Vernon facility personnel training consists of formal training for personnel responsible for handling emergency situations involving hazardous wastes or hazardous materials. The training for emergency response employees will be completed before they are required to perform in an actual emergency.

The training will include:

- The elements of emergency response and the Contingency Plan
- Standard operating procedures associated with handling emergencies
- Personal protective equipment to be worn
- Procedures for handling emergency incidents that do not cause Contingency Plan implementation
- Hazards associated with the various chemicals
- Chemical neutralization procedures
- Isolation of leaks and spills
- Cleanup procedures

- Information about piping, shut off valves and equipment which might be affected during a spill

Formal training will be updated every 12 months, or after an amendment to the Contingency Plan is made.

The plant personnel take part in initial training and an annual refresher training. The plant management maintains records that reflect the job title for each position, amount of initial and continuing training, and records that document training.

Documentation that personnel have received training is a requirement of this plan. Employees sign a training certification which is maintained with other training records. The plant trains personnel commensurate with their job responsibilities and the level of involvement.

Documentation will be maintained with other training records identifying the qualifications and name of the person actually conducting the training. The plant maintains records on current employees until plant closure. Records for former employees are retained three years past the date of employment.

RESPONSE GUIDES

Response Guide 1

Fires

In the event of a fire in the plant, we must initiate evacuation, and all employees are to congregate in the designed areas of the parking lots. When the fire alarm sounds, all employees are to leave their work areas after shutting off their machines and must exit the plant via designated exits. Supervisors are to account for all employees in their department and account for everyone working. Supervisors will perform head counts and report status to the EC.

If a fire develops in any section of the plant, immediate response is to try to contain and extinguish the fire with portable extinguishers. If it cannot be controlled with two extinguishers, the fire alarm is to be sounded and Vernon Fire and Rescue notified. The Fire Department, once on the scene, will lead in the mitigation of the fire with assistance from the EC and other designated personnel. If the threat of offsite transport of toxic smoke, dust, or fumes exists, the EC shall contact local authorities to direct any necessary offsite area evacuations.

Processes that can be approached should be shut down where it is possible and practical to do so. Turn off electrical and natural gas utility services to the impacted areas and, if necessary, to the entire plant.

If a fire is detected in a baghouse, do not open doors for visual inspection as this allows air into the system and "feeds" the fire. The dampers to the affected sections should be closed to suffocate the fire. In most cases this procedure should be sufficient to allow the fire to die out or be greatly reduced before additional fire fighting procedures are initiated.

Cleanup is to be started immediately and all efforts made to prevent water escaping the plant and getting into the sewer or storm drain system.

I. Safety Thinking Comes First

DO NOT enter a potentially dangerous situation alone.

Sound an alarm by alerting management and other workers.

Response Guide 1

Fires
(Continued)

The EC shall assess the emergency and provide all necessary and appropriate notifications to local, state, and federal agencies if: local area evacuations may be advisable, the situation threatens human health or the environment outside the facility, or a release of a reportable quantity of any chemical or hazardous material/waste has occurred or is imminent.

II. Terminate the Contribution Source

Terminating the fire will be the first priority. During the course of the fire, water, chemicals, and solids may be released by fire, or may flow from the fire. Material that is airborne released cannot be controlled, but all persons should be advised of any potential hazard the airborne materials may present to the environment. Material that drains from the area should be contained by diking or redirected to a control or containment area.

III. Confine the Area Affected

Contain and prevent runoff from entering surface drains in the area by diking with soil, sandbags, etc.

IV. Neutralize Harmful Effects

1. Material released because of fire may be neutral, or may be strongly acidic or caustic, and may be quite reactive with water and acids. Avoid direct skin contact, avoid skin contact with vapors, and avoid breathing any vapors. Test solution to determine pH and to identify the material.

2. If the material is acidic, follow the procedures for acid spills. If the material is caustic, follow the procedures for caustic or sodium hydroxide spills.

3. The material may contain lead or other hazardous materials. Flow to surface drainage must be prevented. Diking of outlets from the spill may also be necessary.

Response Guide 1

Fires
(Continued)

Cleanup

1. Pick up material

   - Cleanup the spill material with pumps, vacuum, or other suitable tools. Personnel participating in cleanup operations should wear/utilize the appropriate, approved personal protective equipment (PPE).
   - The remaining wetted spill surfaces should be dried by spreading an absorbent material.
   - Remove absorbent material. If spill was on soil surfaces, also remove the wetted soil.

2. Testing of the affected area

   If the spill or residue resulting from the incident was on soil, the area must be sampled and analyzed for appropriate target compounds. Unless directed otherwise, no sampling or analysis is required for a spill or residue resulting from the incident in an area lined with sealed concrete or within a secondary containment area.

3. Testing of picked up material

   Perform additional testing as necessary to characterize any recovered materials to ensure that proper disposal procedures are followed.

4. Disposition of picked up material

   1. Disposal methods should follow all applicable regulations based upon the components and characteristics of the material. In general, disposal must be in the same manner as would be required for the released substances which are present in the recovered materials.

   2. If appropriate, disposal may be accomplished by rerouting the material back through plant processes or to the Wastewater/Chemical Treatment Plant.

Response Guide 1

Fires
(Continued)

VI. Assess Damage Potential to Humans or the Environment

Provide a brief description of the extent of release and estimated impact on human health and the environment.

VII. Incident Logs and Final Reports

Document the incident by preparing an operating record which describes the emergency situation and the response actions taken. A report is due to the CA EPA within 15 days of an incident for which the Contingency Plan was implemented. If the fire led to the release of any chemical above its reportable quantity, written follow-up notification must be provided to the California Chemical Emergency Planning and Response Commission.

Response Guide 2

Explosion / Plane Crash / Building Collapse

The plant must be evacuated immediately with employees gathering in the parking lot areas designated for fire evacuation.

The fire alarm is to be sounded by the EC or designated employee to evacuate employees, and 911 will be called to alert emergency authorities. Supervisors are to ensure all personnel are accounted for and make a list of anyone missing. The supervisor will report their personnel head counts. If persons are unaccounted for based on reports, the EC will coordinate necessary activities to look for missing persons. When emergency responders arrive, they are to be advised of anyone missing and the area where they were working as well as any hidden dangers that may be present (acid, elevated storage racks, etc.).

Maintenance is to shut off all electricity prior to the arrival of power utility crews to shut down the primary power grid in the area. Maintenance personnel shall also shut down the main gas supply to the plant.

Notify the emergency response team as soon as possible. Do not re-enter the building unless declared safe by the responders or emergency response team.

Response Guide 3A

Acid Spill

(Sulfuric, Acetic, Nitric, etc.)

******CAUTION — Concentrated Acid Spills Are Very Slippery******

1. Safety Thinking Comes First

   DO NOT enter a potentially dangerous situation alone.

   Sound an alarm by alerting management and other workers.

   Sulfuric and nitric acids each have an RQ of 1,000 lbs, and acetic acid has an RQ of 5000 lbs.

   The EC shall assess the emergency and provide all necessary and appropriate notifications to local, state, and federal agencies if: local area evacuations are required, the situation threatens human health or the environment outside the facility, or a release of a reportable quantity of any chemical or hazardous material/waste has occurred or is imminent.

II. Terminate the Contributing Source

1. Using appropriate personal safety equipment, terminate the contributing source, or redirect the flow to a control or containment area.

2. For this specific type of incident, if the spill is from a transporting device, such as a pipe, close off the supply to the pipe, and attempt to evacuate the pipe by opening a down stream or lower elevation valve where the material can be collected and contained.

   If the spill is from a storage unit and not controlled by valving, an attempt should be made to empty the tank or to decrease the liquid volume in the storage unit by directing the liquid into a containment area.

III. Confine the Area Affected

Control the spilled area by diking with soil, sandbags, absorbent material, etc.

Response Guide 3A

Acid Spill

(Sulfuric, Acetic, Nitric, etc.)
(Continued)

IV. Neutralize Harmful Effects

1. ***The material will be strongly acidic, and quite reactive with water and caustics***. Avoid direct skin contact, avoid skin contact with vapors, and avoid breathing any vapors. Test solution to determine pH.

2. If material cannot immediately be picked up from the spill area, attempts should be made to neutralize the acid. Use extreme caution during any neutralization attempts as the spill may be quite reactive with caustics.

3. For small spills, lime or soda ash may be spread directly over the spilled material.

4. For large spills, dry soda ash or similar approved material should be introduced directly on the spilled material starting at the outer edges.

*****CAUTION — Reactions during neutralization may cause spattering and heat release.*****

5. The material is acidic and may contain lead. Flow to surface drainage must be prevented. Diking of outlets from the spill area may also be necessary.

Cleanup

1. Pick up material

    1. Cleanup the spilled material with pumps, vacuum, or other suitable tools.
    2. The remaining wetted spill surfaces should be dried by spreading an absorbent material.
    3. Remove absorbent material. If spill was on soil surfaces, also remove the wetted soil.

Response Guide 3A

Acid Spill

(Sulfuric, Acetic, Nitric, etc.)
(Continued)

2. Testing of the affected area

   If the spill or residue resulting from the incident was on soil, the area must be sampled and analyzed for appropriate target compounds. Unless directed otherwise, no sampling or analysis is required for a spill or residue resulting from the incident in an area lined with sealed concrete or within a secondary containment area.

3. Testing of picked up material

   Perform additional testing as necessary to characterize any recovered materials to ensure that proper disposal procedures are followed.

4. Disposition of picked up material

   1. Disposal methods should follow all applicable regulations based upon the components and characteristics of the material. In general, disposal must be in the same manner as would be required for the released substances which are present in the recovered materials.

   2. If appropriate, disposal may be accomplished by rerouting the material back through plant processes or to the Wastewater/Chemical Treatment Plant.

VI. Assess Damage Potential to Humans or the Environment

Provide a brief description of the extent of release and estimated impact on human health and the environment.

Response Guide 3A

Acid Spill

(Sulfuric, Acetic, Nitric, etc.)
(Continued)

VII. Incident Logs and Final Reports

Document the incident by preparing an operating record which describes the emergency situation and the response actions taken. A report is due to the CA EPA within 15 days of an incident for which the Contingency Plan was implemented. If there was a release of any chemical above its reportable quantity, written follow-up notification must be provided to the California Chemical Emergency Planning and Response Commission.

Response Guide 3B

Caustic Solids Spill

(Lime, Soda Ash, etc.)

I. Safety Thinking Comes First

DO NOT enter a potentially dangerous situation alone.

Sound an alarm by alerting management and other workers.

Sodium Hydroxide (Caustic Soda) and Potassium Hydroxide each have an RQ of 1000 lbs.

The EC shall assess the emergency and provide all necessary and appropriate notifications to local, state, and federal agencies if: local area evacuations may be advisable, the situation threatens human health or the environment outside the facility, or a release of a reportable quantity of any chemical or hazardous material/waste has occurred or is imminent.

II. Terminate the Contribution Source

1. Using appropriate personal safety equipment, terminate the contributing source, or redirect the flow to a control or containment area.

2. For this specific type of incident, close supply or emergency valves, turn off feeders or air pressure, eliminate or decrease air flow in the area. If spill is from a bag or small container, turn the bag or container to limit further release.

III. Confine the Area Affected

1. Lime and soda ash is generally a powder-like solid that is easily conveyed by moving air. As soon as possible, eliminate all air drafts that will spread the material beyond the spill site. An alternative may be to gently cover the spill material with a tarpaulin. (Such tarpaulins must be approved for chemical use to avoid reaction with waterproofing compounds or similar organic material.)

2. Caustic soda/sodium hydroxide and potassium hydroxide as dry chemical are generally supplied in the form of flakes or small pellets. These compounds are very hygroscopic (water absorbing) and become very slippery to the touch and form tacky clumps when exposed to high atmospheric humidity or light mists. In dry flake form, these materials may also be easily conveyed by moving air, as described above.

3. If absolutely necessary to confine these materials, water may be gently added to wet the spill area.

4. Flow to surface drainage must be prevented. Diking of outlets from the spill area may also be necessary.

IV. Neutralize Harmful Effects

1. Remove all non-essential persons from the area to limit exposure.

2. Provide respirators and protective clothing for persons involved in the cleanup and for persons that must remain in the area.

3. The material will probably be **strongly caustic**, and will be **highly reactive** to eyes, nose, throat and lungs; **avoid contact** to sensitive tissue areas and skin -- especially sodium and potassium hydroxide pellets. (Dry lime and soda ash will probably not be highly reactive to skin unless there is prolonged exposure or the presence of water; however it is still best to avoid direct skin contact as much as possible.)

4. The material will probably be strongly caustic, and probably quite reactive with water and acids. Test material to determine pH.

Response Guide 3B

Caustic Solids Spill

(Lime, Soda Ash, etc.)
(Continued)

Cleanup

1. Pick up material

   Cleanup the spilled material with a shovel, vacuum (use plant vacuum), floor scrubber, or other suitable tool. Scrape the area clean to remove all spilled material.

2. Testing of the affected area

   In general, no testing will be required for this type of spill if it is confined within a building or other plant structure, unless the area is over exposed soil, and the area has been subjected to substantial quantities of free liquid during the time the spilled material was deposited on the area.

   NOTE: In general, no testing will be required for lime and soda ash spills since these materials are naturally occurring, and a small residue left from cleanup would not be deleterious to the environment.

3. Testing of picked up material

   Perform additional testing as necessary to characterize any recovered materials to ensure that proper disposal procedures are followed.

4. Disposition of picked up material

   1. Disposal methods should follow all applicable regulations based upon the components and characteristics of the material. In general, disposal must be in the same manner as would be required for the released substances which are present in the recovered materials.

   2. If appropriate, disposal may be accomplished by rerouting the material back through plant processes or to the Wastewater/Chemical Treatment Plant.

Response Guide 3B

Caustic Solids Spill

(Lime, Soda Ash, etc.)
(Continued)

VI. Assess Damage Potential to Humans or the Environment

Provide a brief description of the extent of release and estimated impact on human health and the environment.

VII. Incident Logs and Final Reports

Document the incident by preparing an operating record which describes the emergency situation and the response actions taken. A report is due to the CA EPA within 15 days of an incident for which the Contingency Plan was implemented. If there was a release of any chemical above its reportable quantity, written follow-up notification must be provided to the California Chemical Emergency Planning and Response Commission.

Response Guide 3C

Caustic Liquids Spill
(Solutions of Caustic Soda, Potassium Hydroxide, etc.)

******CAUTION — Liquid Caustic Spills Are Very Slippery, and Concentrated Caustic is Very Heavy******

1. Safety Thinking Comes First

   DO NOT enter a potentially dangerous situation alone.

   Sound an alarm by alerting management and other workers.

   Caustic Soda (Sodium Hydroxide) and Potassium Hydroxide each have an RQ of 1,000 lbs.

   The EC shall assess the emergency and provide all necessary and appropriate notifications to local, state, and federal agencies if: local area evacuations may be advisable, the situation threatens human health or the environment outside the facility, or a release of a reportable quantity of any chemical or hazardous material/waste has occurred or is imminent.

II. Terminate the Contributing Source

1. Using appropriate personal safety equipment, terminate the contributing source, or redirect the flow to a control or containment area.

2. For this specific type of incident, if the spill is from a transporting device, such as a pipe, close off the supply to the pipe, and attempt to evacuate the pipe by opening a down stream or lower elevation valve where the material can be controlled and contained.

   If the spill is from a storage unit and not controlled by valving, an attempt should be made to empty the tank or to decrease the liquid volume in the storage unit by directing the liquid into a containment area.

III. Confine the Area Affected

Control the spilled area by diking with soil, sandbags, absorbent materials, etc.

Response Guide 3C

Caustic Liquids Spill
(Solutions of Caustic Soda, Potassium Hydroxide, etc.)
(Continued)

IV. Neutralize Harmful Effects

1. The material will be strongly caustic (basic), and quite reactive with water and acids. Avoid direct skin contact, avoid skin contact with vapors, and avoid breathing any vapors. Test solution to determine pH.

2. If material cannot immediately be picked up from the spill area, attempts should be made to neutralize the caustic solution. Use extreme caution during any neutralization attempts as the spill may be quite reactive with water and acid.

    1. For small spills, absorbents may be spread directly over the spilled material or water may be added to dilute the spill.

    2. For large spills, *DILUTED* acid may be introduced directly into the spilled material using a long pipe as a "lance" placed directly into the spill. (The dilute acid may be pumped through the lance directly from a transport truck.)

*****CAUTION -- Reactions during neutralization may cause spattering and heat release.*****

3. The material is caustic and may contain lead. Flow to surface drainage must be prevented. Diking of outlets from the spill area may also be necessary.

4. Cleanup

    1. Pick up material

    2. Cleanup the spilled material with pumps, vacuum, or other suitable tools.

    3. The remaining wetted spill surfaces should be dried by spreading an absorbent material.

    4. Remove absorbent material. If spill was on soil surfaces, also remove the wetted soil.

5. Testing of the affected area

   If the spill or residue resulting from the incident was on soil, the area must be sampled and analyzed for appropriate target compounds and pH. Unless directed otherwise, no sampling or analysis is required for a spill or residue resulting from the incident in an area lined with sealed concrete or within a secondary containment area.

6. Testing of picked up material

   Perform additional testing as necessary to characterize any recovered materials to ensure that proper disposal procedures are followed.

7. Disposition of picked up material

   1. Disposal methods should follow all applicable regulations based upon the components and characteristics of the material. In general, disposal must be in the same manner as would be required for the released substances which are present in the recovered materials.

   2. If appropriate, disposal may be accomplished by rerouting the material back through plant processes or to the Wastewater/Chemical Treatment Plant.

VI. Assess Damage Potential to Humans or the Environment

Provide a brief description of the extent of release and estimated impact on human health and the environment.

VII. Incident Logs and Final Reports

Document the incident by preparing an operating record which describes the emergency situation and the response actions taken. A report is due to the CA EPA within 15 days of an incident for which the Contingency Plan was implemented. If there was a release of any chemical above its reportable quantity, written follow-up notification must be provided to the California Chemical Emergency Planning and Response Commission.

Response Guide 3D

Oil Spill
(Petroleum Fuels, Hydraulic Oils, Solvents, etc.)

The following response guide for oil spills should be considered as a supplement to the procedures outlined in the facility's Spill Prevention Control and Countermeasures (SPCC) Plan, which is maintained as a separate document. Refer to that plan for more detailed oil spill emergency protocols and specific information regarding reporting requirements and other pertinent issues.

I. Safety Thinking Comes First

DO NOT enter a potentially dangerous situation alone.

Contact the EC, sound alarm, and alert management and other workers.

The EC shall assess the emergency and provide all necessary and appropriate notifications to local, state, and federal agencies if: local area evacuations may be advisable, the situation threatens human health or the environment outside the facility, or any of the released oil causes a sheen on any surface water, or the shoreline of navigable waters.

II. Terminate the Contribution Source

1. Using appropriate personal safety equipment, terminate the contributing source, or redirect the flow to a control or containment area.

2. For this specific type of incident, if spill is from a transporting device, such as a pipe, close off the supply to the pipe, and attempt to evacuate the pipe by pumping, or by opening a downstream, or lower elevation, valve to redirect the material into a containment area.

   If the spill is from a storage unit, and not controlled by valving, an attempt should be made to empty the tank or to decrease the liquid volume by draining the material into a containment area.

III. Oil Spill Response Actions

A. Control the spill area by diking with soil, sandbags, booms, oil absorbing materials, etc.

B. Shut off any potential ignition sources in the vicinity of the spill, and downwind where vapors may be transported to prevent an oil fire or explosion.

C. If the spill cannot be rapidly contained, efforts should focus on preventing the oil from coming into contact with or entering areas containing hazardous or incompatible materials, flowing into storm drains, or leaving facility property.

D. If onsite oil spill response capabilities have been exceeded, the EC shall contact offsite response contractors to assist in cleanup and recovery activities. The EC and other designated facility personnel shall act to help coordinate continued response activities and provide additional assistance as needed.

IV. Cleanup

1. Pick up material

    1. Cleanup the spilled material with pumps, skimmers, or other suitable tools.

    2. The remaining wetted spill surfaces should be dried by spreading an absorbent material.

2. Testing of the affected areas

    If the spill or residue resulting from the incident was on soil, the area must be sampled and analyzed for appropriate target compounds. Unless directed otherwise, no sampling or analysis is required for a spill or residue resulting from the incident in an area lined with sealed concrete or within a secondary containment area.

3. Disposition of recovered materials

    Consult SPCC plan for proper disposal of recovered oil, impacted soil, and oily wastes.

V. Incident Logs and Final Reports

Document the incident by preparing an operating record which describes the emergency situation and the response actions taken. Consult SPCC Plan and provide any follow-up notifications and perform oil spill emergency response reviews and SPCC Plan updates as required.

Response Guide 3E

General Liquids Spill
(Wastewater, Sanitary Sewer, etc.)

I. Safety Thinking Comes First

DO NOT enter a potentially dangerous situation alone.

The EC or designated employee will sound alarm to alert management and other workers.

The EC shall assess the emergency and provide all necessary and appropriate notifications to local, state, and federal agencies if: local area evacuations may be advisable, the situation threatens human health or the environment outside the facility, or a release of a reportable quantity of any chemical or hazardous material/waste has occurred or is imminent.

II. Terminate the Contribution Source

1. Using appropriate personal safety equipment, terminate the contributing source, or redirect the flow to a control or containment area.

2. For this specific type of incident, if spill is from a transporting device, such as a pipe, close off the supply to the pipe, and attempt to evacuate the pipe by pumping, or by opening a downstream, or lower elevation, valve to redirect the material into a containment area.

   If the spill is from a storage unit, and not controlled by valving, an attempt should be made to empty the tank or to decrease the liquid volume by draining the material into a containment area.

III. Confine the Area Affected

Control the spill area by diking with soil, sandbags, lime, etc.

IV. Neutralize Harmful Effects

1. The material may be neutral, or may be strongly acidic or caustic, and may be quite reactive with water and acids. Avoid direct skin contact, avoid skin contact with vapors, and avoid breathing vapors. Test solution to determine pH and to identify the material.

2. If the material is strongly acidic, follow the procedures for acid spills. If the material is strongly caustic, follow the procedures for caustic spills.

3. The material may contain lead or other hazardous materials. Flow to surface drainage must be prevented. Diking of outlets from the spill area may also be necessary.

V. Cleanup

1. Pick up material

    1. Cleanup the spilled material with pumps, vacuum, or other suitable tools.
    2. The remaining wetted spill surfaces should be dried by spreading an absorbent material.

2. Testing of the affected area

    If the spill or residue resulting from the incident was on soil, the area must be sampled and analyzed for appropriate target compounds. Unless directed otherwise, no sampling or analysis is required for a spill or residue resulting from the incident in an area lined with sealed concrete or within a secondary containment area.

3. Testing of picked up material

    Perform additional testing as necessary to characterize any recovered materials to ensure that proper disposal procedures are followed.

4. Disposition of picked up material

    1. Disposal methods should follow all applicable regulations based upon the components and characteristics of the material. In general, disposal must be in the same manner as would be required for the released substances which are present in the recovered materials.

2. If appropriate, disposal may be accomplished by rerouting the material back through plant processes or to the Wastewater/Chemical Treatment Plant.

VI. Assess Damage Potential to Humans or the Environment

Provide a brief description of the extent of release and estimated impact on human health and the environment.

VII. Incident Logs and Final Reports

Document the incident by preparing an operating record which describes the emergency situation and the response actions taken. A report is due to the CA EPA within 15 days of an incident for which the Contingency Plan was implemented. If there was a release of any chemical above its reportable quantity, written follow-up notification must be provided to the California Chemical Emergency Planning and Response Commission.

Response Guide 3F

Regulated Tank Leak / Failure

1. Safety Thinking Comes First

DO NOT enter a potentially dangerous situation alone.

Sound an alarm by alerting management and other workers.

The EC shall assess the emergency and provide all necessary and appropriate notifications to local, state, and federal agencies if: local area evacuations may be advisable, the situation threatens human health or the environment outside the facility, or a release of a reportable quantity of any chemical or hazardous material/waste has occurred or is imminent.

II. Terminate the Contributing Source

1. Using appropriate personal safety equipment, terminate the contributing source, or redirect the flow to a control or containment area.

2. If the spill is from a transporting device, such as a pipe, close off the supply to the pipe, and attempt to evacuate the pipe by opening a down stream or lower elevation valve where the material can be controlled and contained.

3. If the spill is from a ruptured seam or otherwise failed tank and not controllable by valving, an attempt should be made to empty the tank or to decrease the liquid volume in the storage unit by directing the liquid into a containment area.

4. The affected tank(s) should be taken offline and pumps and valves shut off where possible to minimize the potential spill volume.

III. Confine the Area Affected

Control the spilled area by diking with soil, sandbags, absorbent materials, etc.

Response Guide 3F

Regulated Tank Leak / Failure
(Continued)

IV. Neutralize Harmful Effects

1. The material may be strongly acidic or caustic, and quite reactive with water, strong bases, or acids. Avoid direct skin contact, avoid skin contact with vapors, and avoid breathing any vapors. Test the spilled liquid to determine pH. The RQ for a corrosive material spill (pH less than 2 or greater than 12.5) is 100 lbs.

2. If the material is strongly acidic, follow the procedures for acid spills. If the material is strongly caustic, follow the procedures for caustic spills.

3. The material may contain lead, arsenic, or other toxic metals. Flow to surface drainage must be prevented. Diking of outlets from the spill area may also be necessary. Test the material for metal content. The spill must be reported if the metal concentration is greater than the toxicity characteristic level for that metal (e.g., 5 mg/L for lead or arsenic) and the amount material released is greater than the RQ for that metal (e.g., 10 lb for lead and 1 lb for arsenic).

V. Cleanup

1. Pick up material

    1. Cleanup the spilled material with pumps, vacuum, or other suitable tools.
    2. The remaining wetted spill surfaces should be dried by spreading an absorbent material.
    3. Remove absorbent material. If spill was on soil surfaces, also remove the wetted soil.

Response Guide 3F

Regulated Tank Leak / Failure
(Continued)

2. Testing of the affected area

   If the spill or residue resulting from the incident was on soil, the area must be sampled and analyzed for appropriate target compounds. Unless directed otherwise, no sampling or analysis is required for a spill or residue resulting from the incident in an area lined with sealed concrete or within a secondary containment area.

C. Testing of picked up material

   Perform additional testing as necessary to characterize any recovered materials to ensure that proper disposal procedures are followed.

D. Disposition of picked up material

   1. Disposal methods should follow all applicable regulations based upon the components and characteristics of the material. In general, disposal must be in the same manner as would be required for the released substances which are present in the recovered materials.

2. If appropriate, disposal may be accomplished by rerouting the material back through plant processes or to the Wastewater/Chemical Treatment Plant.

VI. Assess Damage Potential to Humans or the Environment

Provide a brief description of the extent of release and estimated impact on human health and the environment.

VII. Incident Logs and Final Reports

Document the incident by preparing an operating record which describes the emergency situation and the response actions taken. A report is due to the CA EPA within 15 days of an incident for which the Contingency Plan was implemented. If there was a release of any chemical above its reportable quantity, written follow-up notification must be provided to the California Chemical Emergency Planning and Response Commission.

Response Guide 4A

Lead Paste / Desulfurized Mud Spill

Lead paste is primarily composed of lead sulfate, lead oxide, and sulfuric acid. The material is acidic and as such will be reactive with water and caustics. Desulfurized mud is generated by the neutralization of lead-acid battery paste with sodium carbonate (soda ash) and also contains recovered lead smelting furnace flue dust. Its primary component is lead carbonate.

Avoid skin contact with these materials and avoid breathing vapors or dust from dried paste or mud. The RQ for a spill of lead paste and/or desulfurized mud is 10 lbs.

Emergeny activities should follow the protocols outlined in the response guide for regulated tank leak / failure. Properly test all collected materials (recovered liquids, sorbents, and impacted soils) for both lead and pH, perform any necessary reporting required, and dispose of the wastes appropriately.

Response Guide 4B

Flue Dust Spill

I. Safety Thinking Comes First

DO NOT enter a potentially dangerous situation alone.

Sound an alarm by alerting management and other workers.

Flue dust from the secondary lead smelting furnaces which is collected in the bag house contains lead and is a RCRA listed hazardous waste (K069). The RQ for this dust is 10 lbs.

The EC shall assess the emergency and provide all necessary and appropriate notifications to local, state, and federal agencies if: local area evacuations may be advisable, the situation threatens human health or the environment outside the facility, or a release of a reportable quantity of any chemical or hazardous material/waste has occurred or is imminent.

II. Terminate the Contribution Source

1. Using appropriate personal safety equipment, terminate the contributing source, or redirect the flow to a control or containment area.

2. For this specific type of incident, close supply or emergency valves, turn off feeders or air pressure, eliminate or decrease air flow in the area.

III. Confine the Area Affected

1. Lead smelting furnace flue dust is a powder-like solid that is easily conveyed by moving air. As possible, eliminate all air drafts that will spread the material beyond the spill site. An alternative may be to gently cover the spill material with a tarpaulin. (Such tarpaulins must be approved for chemical use to avoid reaction with waterproofing compounds or similar organic material.)

2. If absolutely necessary to confine these materials, water may be gently added to wet the spill area.

3. Flow to surface drainage must be prevented. Diking of outlets from the spill area may also be necessary.

Response Guide 4B

Flue Dust Spill
(Continued)

IV. Neutralize Harmful Effects

1. Remove all non-essential persons from the area to limit exposure.

2. Provide respirators and protective clothing for persons involved in the cleanup and for persons that must remain in the area.

3. The material contains lead dust; **avoid inhalation and contact** to sensitive tissue areas and skin.

V. Cleanup

1. Pick up material

   Cleanup the spilled material with a shovel, vacuum (use plant vacuum), floor scrubber, or other suitable tool. Scrape the area clean to remove all spilled material.

2. Testing of the affected area

   In general, no testing will be required for this type of spill if it is confined within a building or other plant structure, unless the area is over exposed soil, and the area has been subjected to substantial quantities of free liquid during the time the spilled material was deposited on the area.

3. Testing of picked up material

   Test recovered materials (recovered liquids, absorbents, dust, impacted soils) for lead and other hazardous metals content.

4. Disposition of picked up material

   1. Dispose of recovered dust in the same manner as required for original material.

   2. Dispose of the other recovered materials appropriately, depending on the measured content of lead and/or other metals.

VI. Assess Damage Potential to Humans or the Environment

Provide a brief description of the extent of release and estimated impact on human health and the environment.

VII. Incident Logs and Final Reports

Document the incident by preparing an operating record which describes the emergency situation and the response actions taken. A report is due to the CA EPA within 15 days of an incident for which the Contingency Plan was implemented. If there was a release of any chemical above its reportable quantity, written follow-up notification must be provided to the California Chemical Emergency Planning and Response Commission.

Response Guide 4C

Lead-Acid Battery Electrolyte Spill

*****CAUTION -- Battery Electrolyte is acidic, slippery, and reactive with water and caustics.*****

Waste lead-acid battery electrolyte is a solution of sulfuric acid which is likely to contain dissolved lead. Avoid direct skin contact, avoid skin contact with vapors, and avoid breathing any vapors.

If the lead concentration in the electrolyte is greater than 5 mg/L, or if its pH is less than 2 the material is a hazardous waste. The RQ for lead toxicity characteristic waste is 10 lbs (approx. ½ gallon electrolyte), for corrosive waste the RQ is 100 lbs (or about 6½ gallons), and the RQ for sulfuric acid is 1,000 lbs (approx. 65 gallons).

Emergency activities should follow the protocols outlined in the response guide for acid spills. Properly test all collected materials (recovered liquids, sorbents, and impacted soils) for both lead and pH, perform any necessary reporting required, and dispose of the wastes appropriately.

Response Guide 4D

Waste Lead-Acid Battery Spill

Lead-acid batteries contain electrolyte and lead paste that can be released if the battery cases are damaged, cracked, or otherwise ruptured (e.g., if a pallet of batteries is dropped). ***The electrolyte and paste are likely to be acidic (sulfuric acid), and thus slippery and reactive with water and caustics.*** The electrolyte will contain dissolved lead, and the paste contains lead primarily in the form of lead sulfate. Avoid skin contact with battery contents, avoid skin contact with vapors, and avoid breathing vapors.

The RQ for lead paste is 10 lbs. The RQ for the electrolyte is 10 lbs if the lead content is 5 mg/L or greater, 100 lbs if the pH is 2 or lower, and 1,000 lbs for sulfuric acid.

Recovered battery solids can be fed to the RMPS unit. ***Emergency response actions should follow the protocols outlined in the response guides for lead-acid battery electrolyte, acid, and lead paste/desulfurized mud spills.*** Properly test all collected materials (recovered liquids, sorbents, and impacted soils) for both lead and pH, perform any necessary reporting required, and dispose of the wastes appropriately.

Response Guide 5A

Power Failures

ELECTRIC UTILITY: City of Vernon Electricity
4305 Santa Fe
Vernon, CA 90058

Industrial Outage Notification: Normal Hours: (323) 583-8811
After Hours: (323) 585-5070

Electrical failures will be reported by facility personnel to the shift supervisor. The supervisor will call maintenance regarding the cause of the power outage. If electrical outage is area-wide or plant-wide, the supervisor will call the EC who will determine if outage is significant. The EC or designated employee will call the electric company to determine if the duration of the electrical outage is predicted to be longer than two hours or the cause of the outage cannot be fixed quickly. If the duration of the electrical outage is longer than two hours, the EC will either set-up emergency back-up electrical power or evacuate the area or the plant, if necessary, and call 911 to provide additional assistance, if required

The department most vulnerable to a power failure is the smelting and refining area, since this would mean a loss of power to the ventilation system. In this situation, it is possible for heat and fumes to build up inside process buildings. The Battery Energy Storage System (BESS) located between the Smelter Building and the scale house provides uninterruptable power to the critical ventilation system during momentary and/or sustained power interruptions at the plant. The BESS can provide backup power to the critical loads for one hour, allowing the plant to safely shut down if main power cannot be restored.

An orderly shutdown of the furnaces should take place according to the procedure outlined below:

1. Verify that the condition requires initiation of shutdown.
2. Notify affected parties of the potential for release of emissions.
3. Shut down burners.
4. Shut down furnace charging process.
5. Safely close smelter/refining doors to decrease external emissions.
6. Notify Emergency Coordinator.
7. Notify facility maintenance of conditions requiring repair.
8. Follow SOP for notification of SCAQMD (1-800-572-6306),
9. Shift Supervisor complete the facility breakdown report and forward to Environmental Manager.

Response Guide 5B

Utilities

NATURAL GAS: Southern California Gas Company
UTILITY: 1919 S. State College Blvd.
Anaheim, CA 92806

Industrial Outage Notification: (323) 260-7000 or
1-800-427-2000

If a natural gas leak is detected, employees will notify an authorized supervisor. The supervisor will call maintenance. Maintenance will shut off the service to and isolate the area. The area will be tested for explosivity by calibrated portable meters. If the meter indicates high gas levels, higher than the Methane (or Propane, if used) Lower Explosive Limit (LEL), the area will be closed off to personnel and the maintenance supervisor will call the EC and communicate event details. The EC will activate the Contingency Plan if the gas concentration does not return to normal background levels in ten minutes.

If there is a service outage, personnel shall contact an authorized supervisor. The supervisor will call maintenance to shut off the service main to plant and call the EC. The EC will work with the gas company to resolve the gas outage. During the event, the EC will direct maintenance personnel to monitor natural gas pipe lines, gas fired equipment, burners, and associated systems. The EC will coordinate start-up operations after the gas service interruption.

WATER UTILITY: California Water Service
3316 W. Beverly Blvd.
Montebello, CA 90640-1537

Industrial Outage Notification: (323) 722-8601

If there is a service outage, personnel shall contact an authorized supervisor. The supervisor will contact maintenance and the EC if the outage threatens to disrupt critical processes. If necessary the EC shall direct the orderly shut-down of plant systems and work with maintenance personnel and/or water utility representatives to resolve the outage and minimize the effects on the facility. The EC shall coordinate start-up operations as necessary after water service is restored to the affected plant areas.

Response Guide 5C

Wastewater Discharges

City of Vernon: 24 Hours: (323) 583-8811
(Local Sewer System Authority)

Los Angeles County Sanitation District:
Supervising Industrial Waste Inspector: Duty Hours Only: (562) 699-7411
Long Beach Pump Plant: 24 Hours: (562) 437-6520

Sanitary Sewer Treatment Plant: Los Angeles County Sanitation District
Joint Water Pollution Control Plant
24501 South Figueroa Street
Carson, CA 90745

Phone: (323) 775-2351

Wastewater Discharged to Sanitary Sewer

If the pH of the discharge stream from the Wastewater/Chemical Treatment System exceeds the limits established by the local Sanitary Sewer Agency (e.g., if all installed controls fail), **but** the discharge stream remains contained in the sanitary sewer system, the Wastewater/Chemical Treatment System must be shut down immediately following the standard operating procedures. Contact the Emergency Coordinator.

The Emergency Coordinator must immediately notify the Sanitary Sewer Agency of the out-of-limit pH, report the approximate quantity of discharge, and take other appropriate action as required.

Wastewater Discharge Not in Sanitary Sewer

If there is an unauthorized discharge from the Wastewater/Chemical Treatment System, or from the plant, that is **NOT** contained in the sanitary sewer system, action must be taken immediately to shut down the Wastewater/Chemical Treatment System or to curtail and confine the discharge, follow standard operating procedures, and contact the Emergency Coordinator.

Response Guide 5C

Wastewater Discharges

The Emergency Coordinator must immediately notify the appropriate agencies responsible for surface drainage or surface discharges, report the approximate quantity of discharge, the name of the drainage basin affected by the discharge, the pH, and take other appropriate action as required.

Response Guide 5D

Wastewater/Chemical Treatment Plant Solids

I. Safety Thinking Comes First

DO NOT enter a potentially dangerous situation alone.

Alert management and other workers.

II. Terminate the Contributing Source

1. Using appropriate personal safety equipment, terminate the contributing source, or redirect the flow to control or contain the area.

2. For this specific type of incident, close supply or valves, turn off pumps, decrease or release air pressure, lower liquid levels, use sandbags or add control dikes as required.

III. Confine the Area Affected

1. The solids have a limited amount of free liquid and will not readily flow without additional material being added.

2. Control area by sandbags or diking with soil, concrete blocks, boards, etc.

IV. Cleanup

A. Pick up material

Cleanup the spilled material with a shovel, or other suitable tool. Scrape the area clean to remove all spilled material.

B. Testing of the affected area

In general, no testing will be required for this type of spill unless the area has been subjected to substantial quantities of free liquid during the time the spilled material was deposited on the area.

C. Testing of picked up material

Perform testing as necessary to characterize any recovered materials to ensure that proper disposal procedures are followed.

Response Guide 5D

Wastewater/Chemical Treatment Plant Solids
(Continued)

D. Disposition of picked up material

1. Disposal methods should follow all applicable regulations based upon the components and characteristics of the material. In general, disposal must be in the same manner as would be required for the released substances which are present in the recovered materials.

2. If appropriate, disposal may be accomplished by rerouting the material back through plant processes or to the Wastewater/Chemical Treatment Plant.

VI. Assess Damage Potential to Humans or the Environment

Provide a brief description of the extent of release and estimated impact on human health and the environment.

VII. Incident Logs and Final Reports

Document the incident by preparing an operating record which describes the emergency situation and the response actions taken. A report is due to the CA EPA within 15 days of an incident for which the Contingency Plan was implemented. If there was a release of any chemical above its reportable quantity, written follow-up notification must be provided to the California Chemical Emergency Planning and Response Commission.

Response Guide 6

Earthquake Disaster

In the event of an earthquake, employees in the plant shall stop operating equipment and seek immediate shelter in a reinforced area of the plant away from molten lead and chemical storage areas, under a desk or table, or by bracing themselves within door frames or against an inside wall; away from windows, skylights, and top heavy or overhead equipment/machinery/wires.

Once the initial shock stops, employees should remain stationary for several minutes unless absolutely necessary (in case of aftershocks), until an order to evacuate has been issued by the shift supervisor. Follow emergency evacuation procedures being alert for fires, blocked exits, chemical or hazardous material/waste spills, falling objects, and live electrical wires.

After the plant is evacuated, the EC will implement the contingency plan as necessary (and to the extent possible if it is deemed unsafe to re-enter the plant). Critical operations personnel should commence orderly shutdown of affected equipment and processes. Utility feeds (gas, water, and electricity) to the facility should be shut off if there is evidence that the lines have been damaged or if this action is requested by local emergency management agencies.

Response Guide 7A

Bomb Threat

In the event of a bomb threat, the person receiving the call should obtain and record as much information as possible, including:

- Time of day
- Voice characteristics-male/female, accent, sober, ranting, etc.
- Estimated age of caller
- Background noises
- What time bomb to explode
- What type of bomb
- Where it is located
- Why this plant
- Keep on phone as long as possible to get information

Alert plant manager or human resources manager or EC immediately; if possible, get someone to notify while you are on the phone. **DO NOT USE TWO-WAY RADIO SYSTEM!**

The plant manager or human resources manager or EC will notify local authorities by calling the emergency response line (911) and report the threat. If considered serious, the plant must be evacuated as per a fire emergency. All employees are to assemble in the parking lots at designated location. If considered frivolous by the local authorities, they will determine the plan of action and whether or not to implement plant evacuation.

After the plant has been determined safe, all employees will return to work.

A report of the scenario will be written and all pertinent information maintained in case of further problems.

In the case of a call at night, the same operations will be observed.

IF THE THREAT IS IMMEDIATE, THE PLANT MUST BE EVACUATED!

Response Guide 7B

Public Disturbance / Riot

Public disturbances, disorder, or civil strife is a breach of the peace or public order which could result in a riot or mob action directed against the Vernon facility.

In the event of a public disturbance outside or near the facility property:

1. Lock all exterior entrances to facility buildings.
2. Lock or otherwise secure the perimeter (gates, etc.).
3. EXIDE TECHNOLOGIES personnel are to be kept within the facility.
4. Contact the EC to assess the situation and determine if any or all processes should be shut down.

All EXIDE TECHNOLOGIES employees should:

1. Remain in normal work areas.
2. Continue to perform regular work duties, or commence orderly process shut downs if instructed to do so by an area supervisor or the EC.
3. Leave buildings or facility property only when permitted by a Supervisor.

Response Guide 8

First Aid Procedures

The procedures to be followed whether a minor or major injury, under each circumstance, are presented below. The guidelines for blood borne pathogens will also be followed. The Emergency Coordinator is responsible for ensuring these procedures are followed.

Minor Injuries - Not Needing a Doctor's Care

1. Bring the injured employee to the first aid room.
2. Treat the injury.
3. Fill out the treatment log.
4. Return the worker to duty.

Doctor's Care Required — No Bone Involvement, 2nd or 3rd Degree Burns

1. Give first aid.
2. Arrange for transportation to Spectrum Industrial Medical Clinic.
   Do not allow an injured person to drive himself to the clinic.
3. Fill out a treatment authorization slip — give it to the injured worker.
4. Call the hospital — tell them an individual is on the way and describe the injuries.
5. Send the injured worker to Spectrum Clinic by the arranged vehicle.
6. Fill out the treatment log.
7. Call the EC and report status of the situation.
8. Fill out an accident report.
9. The Health and Safety Technician or designated person by EC will follow-up with the clinic about the injured worker and report information to EC.

Doctor's Care Required — Bone Involvement, and 2nd or 3rd Degree Burns

1. Call the paramedics (911) if the worker cannot move or be moved.
2. Give first aid.
3. Arrange for transportation via the paramedics to the proper emergency treatment plant and have the safety representative meet EMS at the gate.
   Do not allow an injured person to drive himself for treatment.
4. Fill out a treatment authorization slip — give it to the injured worker.
5. Fill out the treatment log.
6. Call the EC and report status of the situation.
7. Fill out an accident report.

8. The Health and Safety Technical or designated person by EC will follow-up with the hospital about the injured worker and report information to EC.

Major or Life-Threatening Injury including Heart Attack and Strokes

1. Have the Security Guard call the paramedics (911). Tell them where the injured person is located and what is wrong. Have a safety representative meet EMS at the gate.
2. Provide first aid until paramedics arrive.
3. Bring AED unit to the incident site.
4. Have workers guide the paramedics to the injured person.
5. Call the EC, report status, and get instructions.
6. Fill out an accident report.
7. The Health and Safety Technician or designated person by EC will follow-up with the hospital where the injured person was taken and report information to EC.
8. If the injured person is hospitalized, contact his/her immediate family.
9. Contact the Department Manager and the Human Resources Manager.
10. Keep the accident scene from being disturbed.
11. Notify Cal/OSHA immediately if the person is hospitalized for at least 24 hours.

Fatality

1. Call the Fire Department (911) (only an EMS responder or the city coroner will pronounce death).
2. Keep the scene from being disturbed.
3. Call the EC, report status, and get further instructions from EC.
4. Find any and all witnesses.
5. Make notes on what happened.
6. Make no statements to Police or Fire Department. Let the EC or designated management person perform that task.
7. Contact the immediate family (Plant Manager).
8. Notify Cal/OSHA immediately.

APPENDIX A
EMERGENCY RESPONSE ACTION PACKAGE

CRISIS MANAGEMENT PLAN / CONTINGENCY PLAN SECONDARY LEAD SMELTER

Emergency Response Action Package

February 2005

Revised April 2006

Revised April 2010

Revised September 2011

Revised April 2012

Revised January 2013

Revised March 2013

Revised August 2014

Revised February 2015

Revised April 2015

CONTENTS

Facility Emergency Contacts AP-1
Emergency Coordinators and Alternates AP-1
Authorized shift Supervisors AP-1
Emergency Information AP-2
General Plant Information AP-2
Providers of Emergency Response Assistance AP-2
Emergency Agencies AP-2
Emergency Medical Service Providers AP-3
Y2K Response Team AP-3
Response Contractors AP-4
Emergency Notification Procedures in Event of Chemical Spill AP-5
GNB Environmental AP-5
Government Agencies AP-5
Reportable Spill Materials and Quantities AP-6
Sanitary Sewer Agencies and Drainage System Information AP-8
Surface Drainage Agencies and Drainage Basin Identification AP-9
Figure 1: USGS Topographic Map AP-10
Figure 2: Site Layout Plan AP-11
Figure 3: Plant Evacuation Plan AP-12
Figure 4: Reporting Requirements for Spills (flowchart) AP-13
Crisis Management Guide: Response Steps AP-14
Emergency Coordinator Response Action Checklist AP-15
Crisis Management Plan/Contingency Plan Elements AP-16
1.0 Discovery AP-16
2.0 Contingency Plan Implementation AP-16
3.0 Response to Emergencies AP-17
4.0 Emergency Equipment AP-20
5.0 Evacuation Plan AP-20

Telephone Notification Report (form) AP-21
Contingency Plan Implementation Report (form) AP-22
California Emergency Release Report (form & instructions) AP-23

490.40556

\490-00\actpackVerConPlan.08d.wpd

Facility Emergency Contacts

Persons authorized to act as Emergency Response Coordinators for this facility are identified below. The primary EC is designated on a weekly "on call" rotation. Copies of the monthly on-call roster are maintained at CP1, CP2, CP3, and at the guard gate. **If the primary EC on-call cannot be contacted, continue calling the others on this list until one is reached.** At least one of the Shift Supervisors listed below should be onsite at any given time to provide immediate onsite response assistance after-hours.

Emergency Coordinators and Alternates			
Name, Title, Address	**Telephone Numbers**		
	Plant	**Cellular**	**Home**
Nicolas Serieys Interim Environmental Manager	(323) 262-1101 **EXT. 259**	(310) 909-3884	
Claudia Caneo Safety Manager	(323) 262-1101 **EXT. 276**	(323) 828-0875	
John Hogarth Plant Manager	(323) 262-1101 **EXT. 275**	(323) 395 6130	(626) 345 5008
Rafael Perez Operations Manager	(323) 262-1101 **EXT. 241**	(818) 974-5358	
John Martinez Maintenance Supervisor	(323) 262-1101 **EXT. 226**	(323) 203 8864	(909) 923 4239
Mamun Hossain Materials Manager	(323) 262-1101 **EXT. 211**	(323) 816 3508	

Authorized Shift Supervisors (Onsite Coordinators)			
Name, Title	**Telephone Numbers**		
	Plant	**Cellular**	**Home**
Art Vasquez Smelting & Refining Manager	(323) 262-1101 **EXT. 286**	(626) 991 0755	
Lorenzo Carlos Shift Supervisor	(323) 262-1101 **EXT. 286**	(323) 216-9033	
Marshall Pitts Shift Supervisor	(323) 262-1101 EXT. 286		

Emergency Information

General Plant Information	
Plant Name	Exide Technologies Resource Recycling Division
Plant Physical Address	2700 South Indiana Ave. Vernon, CA 90058
Plant Mailing Address	Exide Technologies Resource Recycling P.O. Box 23957 Los Angeles, CA 90058
Owner/Operator	Exide Technologies 13000 Deerfield Parkway, Suite 200 Milton, GA 30004
EPA ID Number	CAD 097 854 541
SIC Code	3341 (Secondary Nonferrous Metals Smelter)
Plant Phone Number: Fax:	(323) 262-1101 (323) 269-1906

Providers of Emergency Response Assistance

The Vernon facility has or is in the process of reaching agreements for response and support services from the following local emergency agencies, medical service providers, and emergency response contractors.

Emergency Agency	Telephone Number
City of Vernon Fire and Rescue 4305 S. Santa Fe Ave., Vernon, CA 90058	911 or (323) 583-6331 (Emergency) (323) 583-4821 (Business)
City of Vernon Police Department 4305 S. Sante Fe Ave., Vernon, CA 90058	911 or (323) 587-8135 (Emergency) (323) 587-5171 (Business)
City of Vernon Department of Environmental Health	(323) 583-8811 (Emergency)
Los Angeles County Sheriff 4700 Ramona, Monterey Park, CA 91754	911 or (323) 526-5541
City of Vernon Fire — Emergency Number (Call for HAZMAT Dispatch)	(323) 583-6331
California Office of Emergency Services	1-800-852-7550
Local Emergency Response Administering Agency (City of Vernon Emergency Services)	911 or (323) 583-4821
Advanced Cleanup Technologies, Inc. 18414 S. Santa Fe Ave. Rancho Dominguez, CA 9022 1	(310) 763-1423
Environmental Recovery Services 2650 Lime Ave., Signal Hill, Ca 90806	(562) 427-7277

Providers of Emergency Response Assistance (cont.)

Emergency Medical Service Providers		
Service		**Telephone Number**
Ambulance / Emergency Medical Transport		911
	U.S. Health works 3851 Soto Street Vernon, CA 90058	(323) 585-7162
	Stacey Medical Center 4580 Pacific Blvd Vernon, CA 90058	(323)584-0779
	U.S Health Works (HOLIDAYS) 3430 Garfield Avenue Commerce, CA 90040	(323) 722-8481 (Holidays)
Hospitals:	White Memorial Medical Center 1720 Cesar Chavez Avenue Los Angeles, CA 90033	(323) 268-5000
	Los Angeles County USC Medical Center 1200 N. State Street Los Angeles, CA 90033	(323) 226-2622
	U.S Health Works (Outpatient Clinic Only) 3364 E. Slauson Avenue Los Angeles, CA 90058	(323) 584-7242

Providers of Emergency Response Assistance (cont.)

Response Contractor	Telephone Number	Contact
Environmental Recovery Services, Inc. 2650 Lime Avenue Signal Hill, CA 90806	(562) 427-7277	Debbie Avots
Bob Hill Hydraulic Crane 1390 East Burnett Street, Suite B Long Beach, CA 90806	(310) 426-6445	--
Economy Rentals 5511 Whittier Blvd. Los Angeles, CA 90022	(323) 723-9737	--
Advanced Cleanup Technologies, Inc. (ACTI) 18414 S. Santa Fe Avenue Rancho Dominguez, CA 90221	(310) 763-1423	Pete Espanza

Emergency Notification Procedures in Event of Chemical Spill

EXIDE Environmental (Call in Order until You Reach One Person)			
Name	**Home Phone**	**Work Phone**	**Fax**
Fred Ganster	N/A	610-921-4052	610-921-4062
Barbara Hatcher	N/A	678-566-9639	678-566-9650

Government Agencies			
Agency	**Phone**	**Level**	**Notification Required**
TSCA National Response Center (NRC)	(800) 424-8802	Federal	ASAP, verbal: if a release ³ RQ[1] impacts soil or any offsite receptor (air, water, soil, sewer, or person).
US EPA Region IX San Francisco Main Office Spill Line 24-Hour Technical Assistance	(415) 744-1529 (415) 744-2000 (415) 744-1450	Federal	A copy of any written notification sent to the California EPA should also be provided to the US EPA Region 9 Administrator.
California State Warning Center	(800) 852-7550	State	ASAP, verbal: if a release or threatened release.).
CA EPA Region 3 Dept. of Toxic Subst. Control	(818) 551-2800	State	Written, within 15 days: for any incident requiring implementation of this Contingency Plan.
California Chemical Emergency Planning & Response Commission		State	Written, within 30 days: if a release ³ RQ[1] impacts soil or any offsite receptor (air, water, soil, sewer, or person).
California OSHA Monrovia Field Office	(626) 256-7913	State	Verbal, within 8 hours: of the serious injury, death or, hospitalization of an employee for more than 24 hours.
Local Emergency Response Administering Agency (City of Vernon Emergency Services)	(323) 583-8811	Local	ASAP, verbal: if a release or threatened release.
City of Vernon Fire Emergency HAZMAT Dispatch	(323) 583-6331	Local	ASAP, verbal: in the event of possible or actual offsite exposure to or injuries resulting from materials released
LA County Sanitation District Duty Hours: After Hours:	(310) 699-7411 (310) 437-6520	Local	ASAP, verbal: if a release impacts sanitary or storm sewer system.

Reportable Spill Materials and Quantities

Material	Constituents of Concern	Reportable Quantity [B]	Estimated Quantity of Spilled Material to Reach RQ[A]
Lead and Lead Compounds (Dust)[A]	Lead	10 lb	10 lb
Lead-Bearing Scrap (Dust)[A]	Lead Arsenic Cadmium Antimony Copper	10 lb 1 lb 10 lb 5000 lb 5000 lb	10 lb ¸ Lead fraction 1 lb ¸ Arsenic fraction 10 lb ¸ Cadmium fraction 5000 lb ¸ Antimony fraction 5000 lb ¸ Copper fraction
Secondary Lead Smelting Furnace Flue Dust	K069 Listed Waste	10 lb	10 lb
Lead-Acid Batteries (spilled/leaked contents)	Lead Lead Corrosive Waste Sulfuric Acid	10 lb 10 lb 100 lb 1000 lb	10 lb lead paste ½ gallon electrolyte if ³5 mg/L lead 6.5 gallons electrolyte if pH £ 2 65 gallons electrolyte (15.3 lb/gal)
Spent Lead-Acid Battery Electrolyte	Lead Corrosive Waste Sulfuric Acid	10 lb 100 lb 1000 lb	½ gallon if lead content ³5 mg/L 6.5 gallons if pH £ 2 65 gallons (15.3 lb/gal)
Lead Paste / Desulfurized mud	Lead	10 lb	10 lb
Sulfuric Acid	Sulfuric Acid	1000 lb	65 gallons (15.3 lb/gal)
Nitric Acid	Nitric Acid	1000 lb	84 gallons (11.8 lb/gal)
Acetic Acid	Acetic Acid	5000 lb	570 gallons (8.75 lb/gal)
Lead Carbonate, $PbCO_3$	Lead	10 lb	12.9 lb (77.54% lead content)
Arsenic (Dust)[A]	Arsenic	1 lb	1 lb
Caustic Soda (Sodium Hydroxide)	NaOH	1000 lb	1000 lb as dry chemical (pellet/flake) 56 gallons of solution (17.8 lb/gal)
Potassium Hydroxide	KOH	1000 lb	1000 lb as dry chemical (pellet/flake)
Acetone	Acetone	5000 lb	757 gallons (6.6 lb/gal)
Methanol	Methanol	5000 lb	
Ferric Chloride	Ferric Chloride	1000 lb	1000 lb as dry chemical 41 gallons in solution (24.2 lb/gal)
Corrosive Hazardous Waste	pH £ 2 pH ³ 12.5	100 lb 100 lb	100 lb 100 lb
Toxic Hazardous Waste [C]	Lead, ³5 mg/L Arsenic, ³5 mg/L Cadmium, ³1 mg/L	10 lb 1 lb 10 lb	10 lb 1 lb 10 lb

Notes:

[A] If a released material consists of solid particles of antimony, arsenic, cadmium, chromium, copper, or lead with a mean diameter greater than 100 microns (0.004 inches), notification is not required (40 CFR §302.6).

[B] Notifications must be given for each component in a reportable spill for which an RQ is exceeded (*e.g., a 1,000 gallon spill of spent lead-acid battery electrolyte with pH less than 2 and lead content greater than 5 mg/L would be reportable as sulfuric acid, corrosive hazardous waste, and lead-bearing hazardous waste*).

[C] Constituents of concern levels for these materials represent the toxicity characteristic leaching procedure extract concentrations if the waste is a solid, or the actual component concentrations if the waste is a liquid (see 40 CFR §261.24).

Note: Notification to the City of Vernon and the California State Warning Center is required for releases or threatened releases under the Reportable Quantities if they pose a hazard to human health and safety, environment, or property (notification should be made even if the impacts are potential or delayed).

Sanitary Sewer Agencies

Agency:	Phone:
Los Angeles County Sanitation District (Trunk sewers and treatment plants)	
Supervising Industrial Waste Inspector: (Business Hours: 9-5 on weekdays only)	(562) 699-7411 Ext. 2907
Long Beach Pump Plant: (24-Hour reporting, incl. weekends, & holidays)	(562) 437-6520
General Information (Industrial Waste Section): (Business Hours: 9-5 on weekdays only)	(562) 699-7411 Ext. 2900
City of Vernon (Local Sewer System Authority & City Engineer — 24 hours)	(323) 583-8811

Sanitary Sewer Drainage System Information

Vernon Facility

Site Street Address:	Phone:
2700 South Indiana Street Vernon, CA 90058	(323) 262-1101

Sanitary Sewer Plant

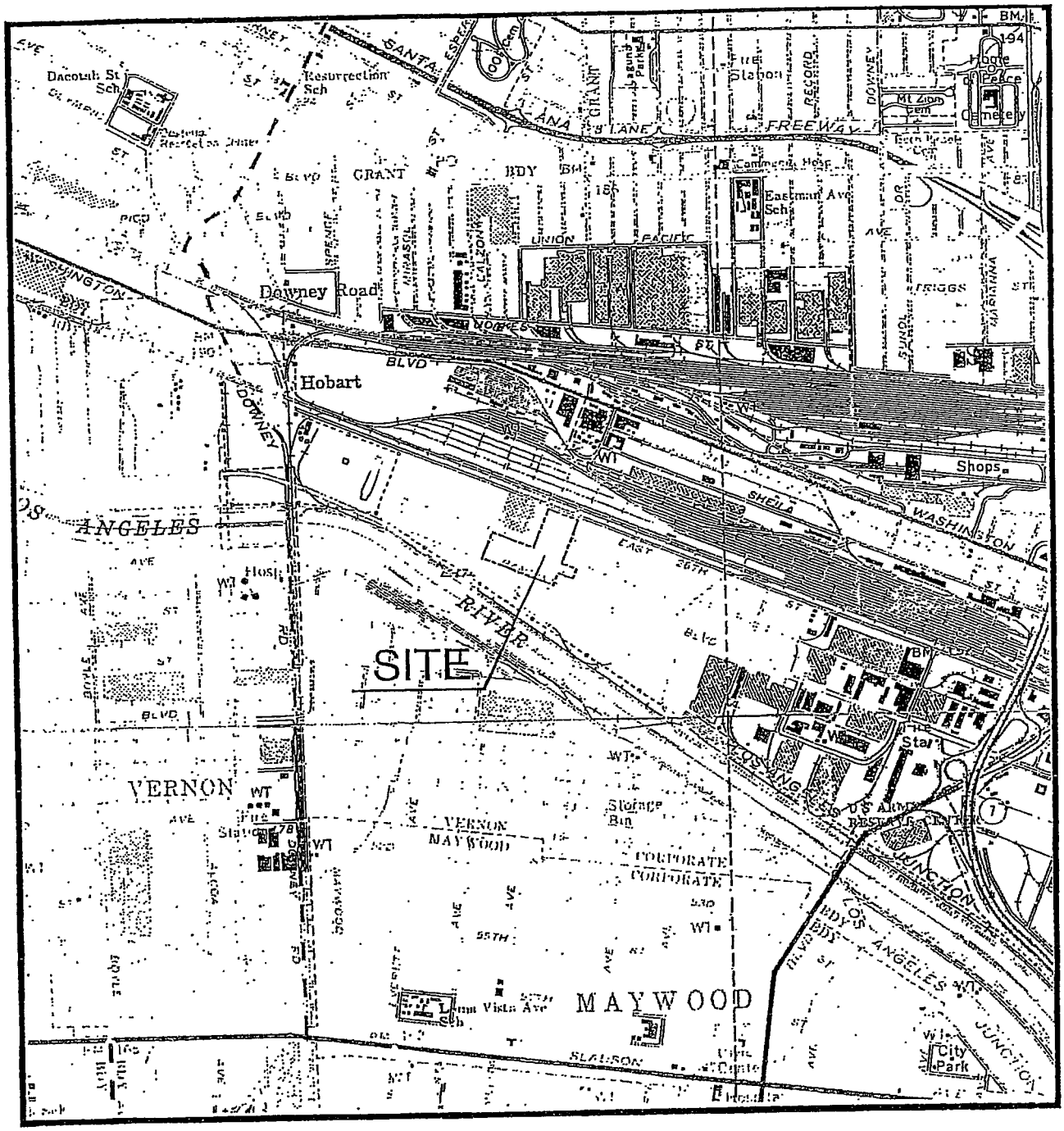
Street Address:	Phone:
Los Angeles County Sanitation District Joint Water Pollution Control Plant 24501 South Figueroa Street Carson, CA 90745	(323) 775-2351

Surface Drainage Area Emergency Agencies

Agency	Phone
City of Vernon Fire Emergency: HAZMAT Dispatch	(323) 583-6331
California State Warning Center:	
24-Hour Warning Center	(916) 262-1621
24 Hour Hazardous Material Spill Reporting	(800) 852-7550
(To obtain a Spill Incident Control Number)	
Los Angeles County Department of Public Works	
24 Hours	(626) 458-4357

Surface Drainage Basin Authority

Los Angeles County Sanitation District:	
Duty Hours (Weekdays 9-5, only)	(562) 699-7411
Off Hours (24 Hour notifications)	(562) 437-6520



SCALE 1:24000

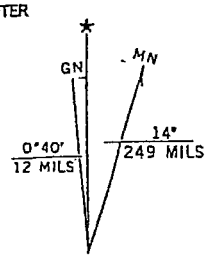
1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 0.5 0 1 KILOMETER

QUADRANGLE LOCATION

Contour interval: 20 feet
Source: Composite of Los Angeles & South Gate, California, 7.5 Minute Series, U.S.G.S. Topographic Maps



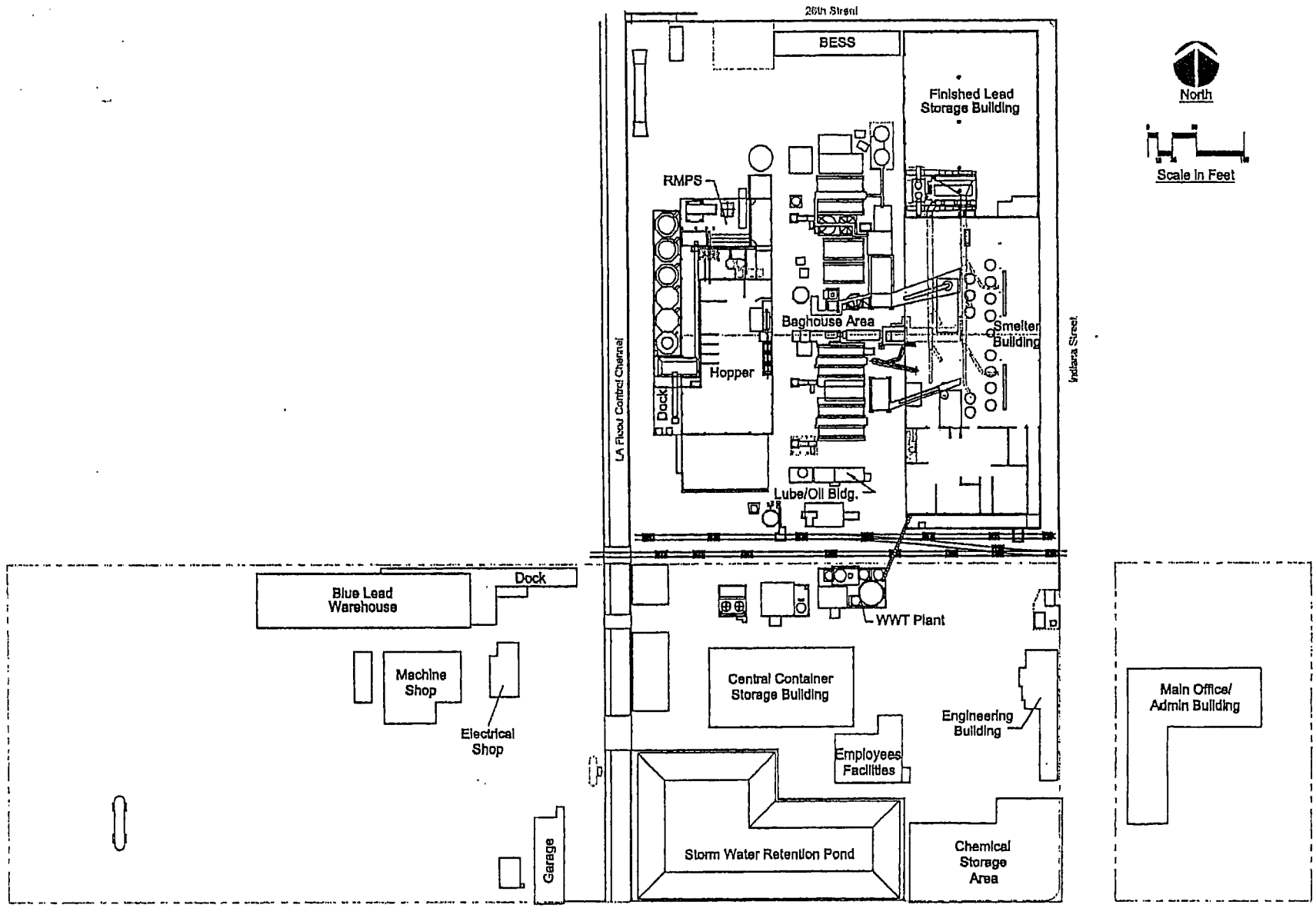
UTM GRID AND 1994 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

2390-002 1=1 07-27-00 RCW 2390.00001.JAP

Exide Technologies - Vernon, California

FACILITY LOCATION MAP

FIGURE 1

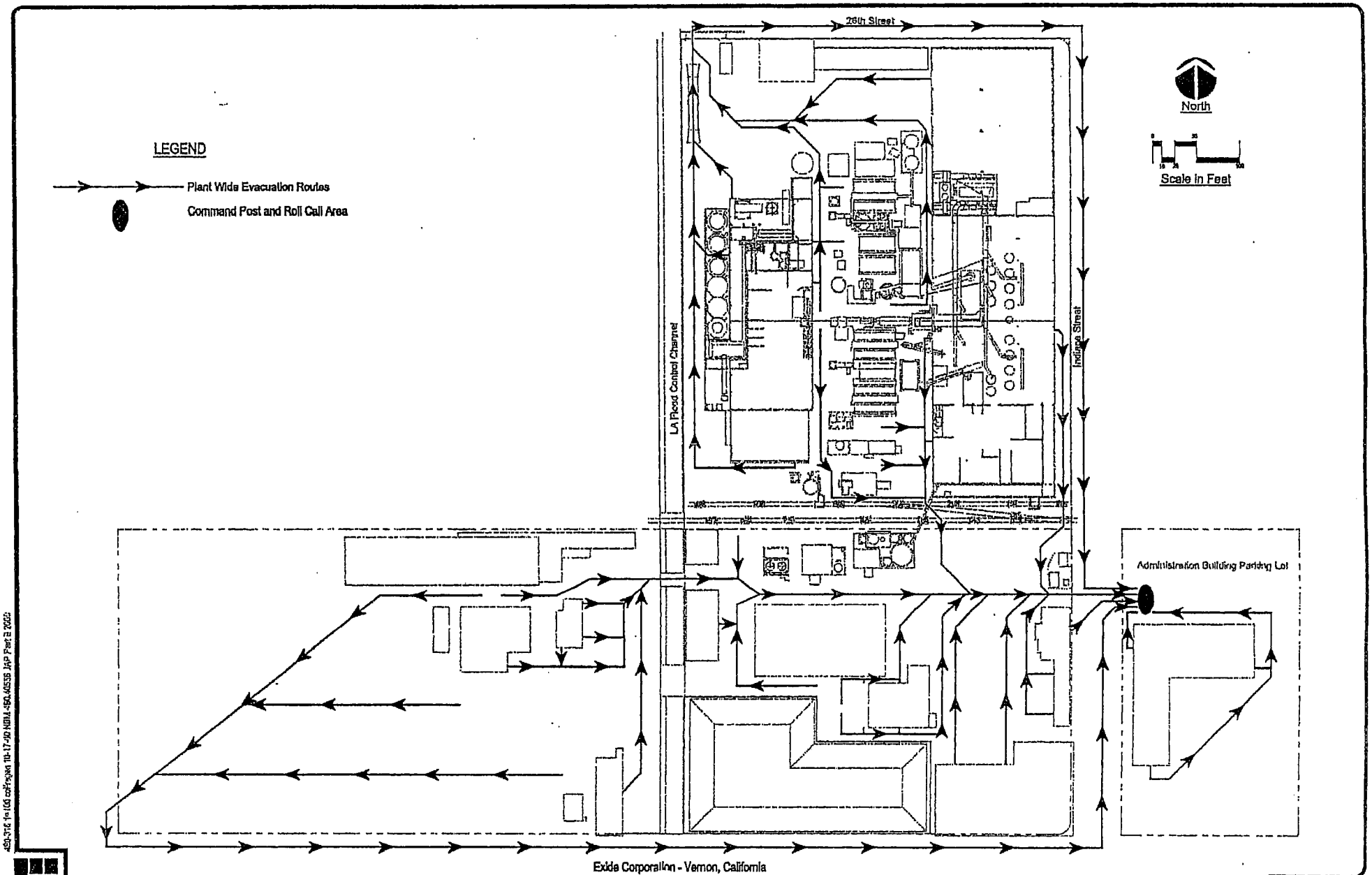


Exide Corporation - Vernon, California

SIT AYOUT

FIGURE 2

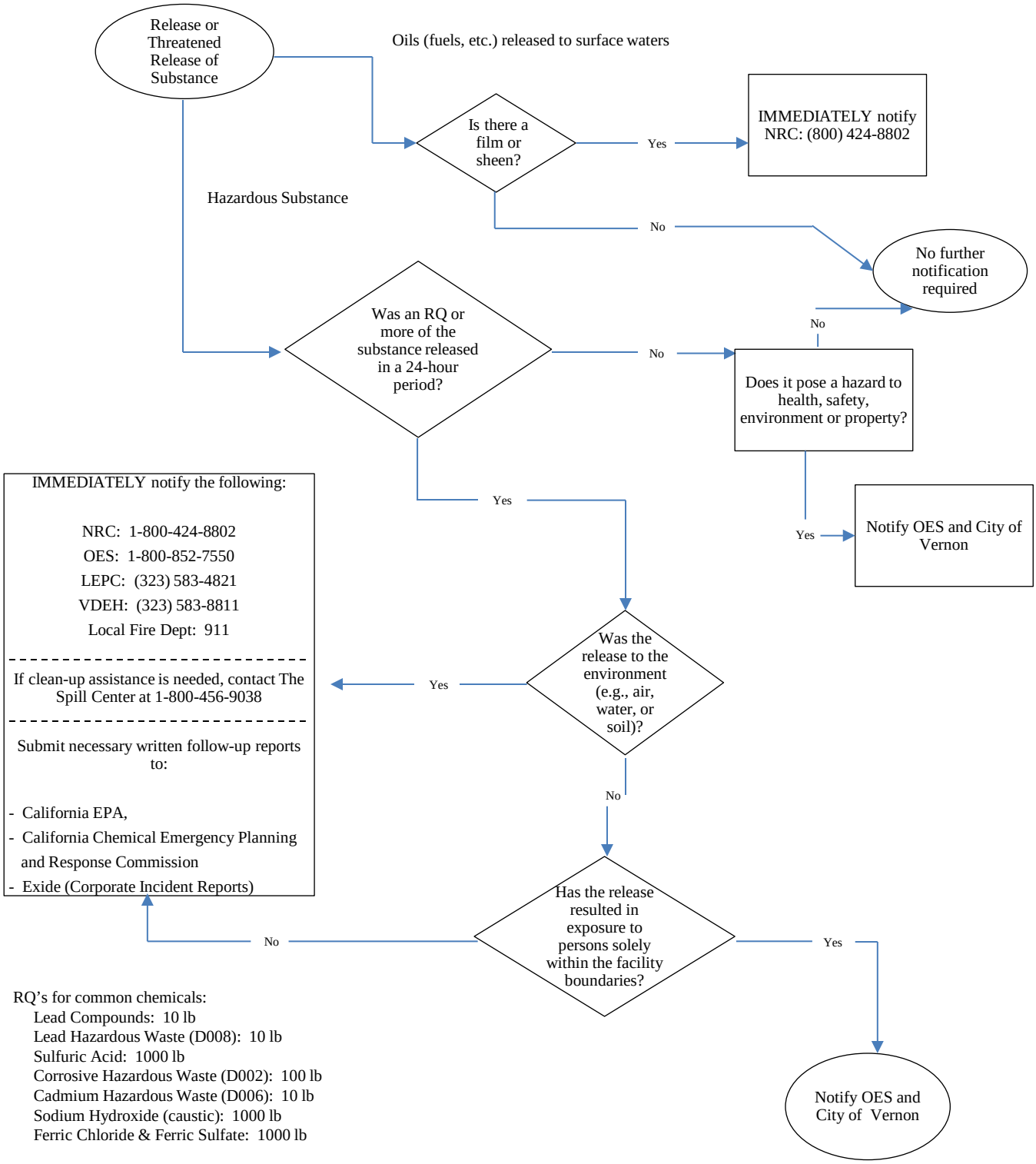
490-517 1=100 col 10-17-00 NBM 490.41035 JAP Part B 2000



Exide Corporation - Vernon, California

PLANT WIDE EVA ATION ROUTE PLAN

FIGURE 3



RQ's for common chemicals:

- Lead Compounds: 10 lb
- Lead Hazardous Waste (D008): 10 lb
- Sulfuric Acid: 1000 lb
- Corrosive Hazardous Waste (D002): 100 lb
- Cadmium Hazardous Waste (D006): 10 lb
- Sodium Hydroxide (caustic): 1000 lb
- Ferric Chloride & Ferric Sulfate: 1000 lb

(Refer to 40 CFR 302 for a complete list of CERCLA hazardous substances and 40 CFR 355 Appendix A for extremely hazardous substances.)

CRISIS MANAGEMENT GUIDE

Response Steps:

1) Contain and Isolate Spill to Minimize Impact and Prevent Worsening of Situation, if Possible
2) Contact Plant Shift Supervisor for Direction
3) Contact Plant Emergency Coordinator
4) Evaluate Situation and Establish Plan of Attack
5) Identify Required Resources
6) Implement Emergency Contingency Plan if Necessary
7) Alert Plant Personnel and Offsite Agencies as Required
8) Reevaluate Progress and Alter Actions if Necessary
9) Continue Items 4-8 Until Situation is Under Control
10) Confirm That Danger is Over
11) Establish Cause for Incident and Long Term Impact
12) Take Control Action to Prevent Future Incidents
13) Debrief and Review Performance of Plant Emergency Response Team
14) Modify Plan to Cover Shortfalls Discovered During Incident
15) Review Modified Plan and Include in Emergency Contingency Plan

Emergency Coordinator Response Action Checklist

Yes ✔	NA ✕	Action Item
		1. Activate internal communication systems and notify all plant personnel.
		2. Initiate spill containment and control, process shut downs, and evacuations; direct assistance to injured personnel; and mobilize other onsite emergency response activities as necessary.
		3. Notify appropriate State or local response agencies with designated and assigned responsibilities if their assistance is needed.
		4. Determine the character, source, amount, an areal extent of any released materials.
		5. Assess potential hazards to human health or the environment that may result from the emergency.
		6. Report the emergency if it is determined that conditions exist that have or may threaten human health and the environment by providing verbal notification of the situation to the local emergency administering agency, the state Office of Emergency Services, and the National Response Center (NRC).
		7. Report releases greater than reportable quantities of any chemical or hazardous material/waste for which release reporting is required (a release which impacts soil or an offsite receptor -- air, water, soil sewer, or person) to the California Office or Emergency Services and the National Response Center.
		8. Perform necessary actions to ensure fires, explosions, and releases do not occur, recur, or spread.
		9. Monitor plant for leaks, pressure build-up, gas generation, and ruptures in pipes, tanks, or other equipment if the plant stops operation due to fire, explosion, or release.
		10. Perform necessary post emergency actions to manage waste residues that result from the emergency.
		11. Perform required post emergency actions to ensure against contact or mixing of wastes or incompatibles with the released material, and ensure that all emergency equipment listed in the plan is cleaned and ready for use before resuming plant operations.
		12. Notify the Director at the CA EPA and local authorities that the plant has completed the post emergency actions in affected areas prior to resuming plant operations.
		13. Generate a report of the emergency for the plant operating record (if the emergency required implementation of the Contingency Plan).
		14. Prepare and submit Corporate Incident and Lost Time Incident Reports as applicable.
		15. Submit a report to the CA EPA within 15 days of the incident (if it required implementation of the Contingency Plan).
		16. Submit a report to the California Chemical Emergency Planning and Response Commission (CEPRC) within 30 days of the incident (if any chemical was released in excess of its reportable quantity).

CRISIS MANAGEMENT PLAN/CONTINGENCY PLAN ELEMENTS

1.0 DISCOVERY

The plan is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous materials to air, soil, surface water, or groundwater. The provisions of the plan will be carried out immediately whenever there is such an emergency which could threaten human health or the environment.

The following situations will constitute an emergency requiring implementation of the plan:	
Injury to employee	When the injury is of a serious enough nature that medical attention above the level of first air is required.
Major spills or releases	When the spill could cause the release of toxic materials and/or corrosive liquid to the environment as follows: • The release/spill can be contained on-site, but the potential exists for groundwater contamination; • The release/spill cannot be contained on-site; or • The release/spill cannot be brought under control within ten minutes.
Fires and explosions	When a fire is discovered or an explosion occurs and the situation cannot be brought under control within a reasonable amount of time with the equipment on-hand.

Emergency procedures will be executed for any event associated with hazardous materials or hazardous waste involving any possible danger to personnel, equipment, or the environment. Situations that (1) occur entirely within the plant; AND (2) are totally contained with no threat to personnel or the environment, do not require formal implementation of this plan; however, applicable spill procedures in the plan should be used during clean-up operations for any minor spill events that may occur.

2.0 CONTINGENCY PLAN IMPLEMENTATION

The procedures contained in this Contingency Plan will be carried out immediately whenever there is a fire, explosion, or release that could threaten human health and the environment. The release of small quantities of process materials, reagents, or hazardous waste from plant areas that **do not pose** a potential for fire, explosion, off-site run-off, groundwater contamination and can be cleaned up using routine procedures, **will not cause** the Contingency Plan to be activated. In cases where chemicals are spilled outside of buildings in quantities less than the reportable quantity (RQ) and the spill does not pose a potential for air release and is contained on-site, the Contingency Plan **will not be activated**. The emergency procedures presented in this Crisis Management Plan/Contingency Plan should be used to mitigate minor emergencies that do not require Contingency Plan activation.

3.0 RESPONSES TO EMERGENCIES

The Contingency Plan will be activated in case the emergency is a fire, explosion, or release of hazardous waste or hazardous materials of sufficient magnitude to threaten human health and the environment. Detailed employee emergency response guidelines are presented in Section 6. The following list summarizes the response actions that will be performed during significant emergencies:

Fires and Explosions — When a fire or explosion is observed onsite, employees shall notify an authorized supervisor. The supervisor will call the Emergency Coordinator (EC) to assess the situation. If the fire requires more than two fire extinguishers to be used or if an explosion is not contained, then the EC shall activate the Contingency Plan by contacting 911 to notify City of Vernon Fire and Rescue. The EC will coordinate subsequent response activities and any necessary process shut-downs.

Train Derailments — In the event a train derailment impacts the facility, employees should remain in their work areas unless directed to vacate by the EC or area supervisor. The EC shall be notified and will implement the contingency plan as necessary in response to the level of plant disruption due to the accident. Potential emergency scenarios include injuries, damage to buildings and other onsite structures, fire, power supply disruption, and the possible release of hazardous materials/wastes if a rail car or debris impacts a tank, bag house, storage area, pipeline, etc.

Regulated Tank Leak or Failure — In the event of a leak or failure of a tank onsite, employees shall contact an authorized shift supervisor and the EC. Emergency responders using appropriate personal protective equipment should stop the flow of product, and work to contain the spill to minimize the area of impact. The tank should be immediately taken off line, and downstream processes supplied by it, or upstream processes contributing to it should be shut down (or process flows diverted to or from backup or redundant tanks). The EC shall make emergency notifications as necessary, and direct and coordinate the efforts to contain, collect, neutralize, and dispose of the recovered materials.

Hazardous Material / Waste Spills — For hazardous material/waste spills or overflows of hazardous liquids, employees shall notify an authorized supervisor of the emergency. The supervisor will contact the EC and provide him/her with the facts necessary to assess the situation. If a spill or overflow cannot be contained on-site, or if a hazardous liquid overflows emergency containment prior to on-site treatment, the EC will activate the Contingency Plan and direct response efforts to mitigate the incident. The EC shall contact 911, other emergency agencies, and response contractors as necessary to provide emergency response assistance and provide necessary spill notifications to the appropriate government agencies (including the local POTW and sanitation district if sewer or storm drainage systems are or may be impacted). The EC shall also oversee the proper handling and disposal of recovered or treated hazardous materials, wastes, and residues.

Acid Spills — If an acid spill is detected, employees shall inform an authorized supervisor, who will then notify the EC of the situation. Initial response actions by employees using appropriate personal protective equipment should be directed at stopping any acid flows from the contributing

sources and containing the released material, if possible and safe to do so. The EC shall make emergency notifications as necessary, and direct and coordinate the efforts to contain, collect, neutralize, and dispose of the recovered materials.

Oil Spills — Petroleum products such as vehicle fuel leaks or fuel oil delivery leaks should be controlled in an appropriate manner to prevent discharges to air, soil, and water. Detailed procedures for handling oil spills at this facility are included in the Spill Prevention Control and Countermeasures (SPCC) Plan maintained separately from this document.

Electrical Failures — Electrical failures will be reported by employees to their supervisor. The supervisor will call maintenance regarding the cause of the power outage. If electrical outage is area wide or plant-wide, the supervisor will call the EC who will determine if outage is significant. The EC or designated employee will call the electric company to determine if the duration of the electrical outage is predicted to be longer than two hours or the cause of the outage cannot be fixed quickly. If the duration of the electrical outage is longer than two hours, the EC will either arrange for long-term emergency back-up electrical power, initiate process shut-down procedures, direct any necessary plant-area evacuations, and call 911 to obtain additional assistance, if required.

Gas Leaks — If a natural gas leak is detected, the employee will call an authorized supervisor. The supervisor will call maintenance. Maintenance will shut off the service to and isolate the area. The area will be tested for explosivity by calibrated portable meters. If the meter indicates high gas levels, higher than methane (propane, if used) Lower Explosive Limit (LEL), the area will be isolated and the maintenance supervisor will call the EC and communicate event details. The EC will activate the Contingency Plan if the gas concentration does not return to normal background levels in ten minutes.

If there is a service outage, the employee will call an authorized supervisor. The supervisor will call maintenance to shut off the service main to plant and call the EC. The EC will work with the gas company to resolve the gas outage. During the event, the EC will direct maintenance personnel to monitor natural gas pipe lines, gas fired equipment, burners, and associated systems. The EC will coordinate plant process shut-downs (where necessary) and subsequent start-up operations after the gas service interruption.

Sewer/Wastewater Overflows — If a sewer or wastewater overflow is observed, the employee will call the shift supervisor. The supervisor will call the EC and give details of the event. If the sewerage or wastewater is going off-site then the Contingency Plan will be activated. The EC will coordinate subsequent activities necessary to mitigate the incident.

Natural Disasters — For natural disasters, the EC and/or designated employee will monitor weather reports to assess the magnitude of the weather.

Serious Health Injuries — For serious health injuries including heart attacks, strokes, and fatalities, the employee will call the supervisor. The supervisor will call 911 and the EC to communicate the status of the situation. The EC will advise the supervisor or designated person to

watch injured person and wait for emergency medical responders. The EC will coordinate the additional response and follow-up activities.

Floods — For floods, the plant's lower elevations or flood-prone areas will be monitored, and required diking and stabilization of perimeter walls or drainage channels will be performed; the EC will activate the Contingency Plan if an operation area, utility area, water supply/water treatment area is flooded.

Earthquakes — After the initial shock, the EC on site shall monitor the situation and give the evacuation signal when the immediate threat of aftershocks has passed. After the plant is evacuated, the EC will implement the contingency plan as necessary (and to the extent possible if it is deemed unsafe to re-enter the plant). Utility feeds (gas, water, and electricity) to the facility should be shut off if there is evidence that the lines have been damaged or if this action is requested by local emergency management agencies.

Public Disturbance / Riot — In the event of a civil disturbance outside or near the facility, employees should lock outside entrances to buildings and secure the facility perimeter (close/lock gates, etc.). Remain inside the plant and continue normal work activities. If the situation warrants, the EC may order process shut downs as necessary. Personnel should not leave the facility until permitted to do so by the EC or a plant supervisor.

Internal Labor Dispute / Strike — The main threat to the facility during a labor dispute is sabotage or vandalism. Plant management and non-striking employees should initiate the orderly shut down of non-critical or threatened plant processes, and these areas should be secured and monitored by plant security. The plant as a whole and any processes still in production should also be protected, and employees should be on the alert for potential problems. The EC shall implement the contingency plan as necessary in response to any emergency situation that might arise.

Other Events — For events including bomb threats, vandalism, and sabotage - the employee will report the incident to the supervisor. The supervisor will notify the EC, who will collect the facts and determine if the Contingency Plan should be activated.

In events involving natural gas, liquefied petroleum gas, or compressed propane gas, the response action should be performed in accordance with the vendor's/supplier's directions and with assistance from the local fire department.

In the event of a Y2K-related malfunction, including internal problems in the facility (PCs, Programmable Logic Controllers, Electronics Components or other embedded systems) or external problem with the local Utilities (Electrical Power, Natural Gas, Propane, Water or Telecommunications) refer to the facility's ***Y2K Contingency Plan*** and contact one member of the facility **Y2K Emergency Response Team**.

The site-specific procedures to be performed during the emergencies that require Contingency Plan implementation are presented in **Section 7.6** of the complete plan.

4.0 EMERGENCY EQUIPMENT

The Vernon facility maintains fire control equipment (water hydrants and hoses), portable fire extinguishers (including special extinguishing agents such as foam, inert gas, or dry chemicals), spill control equipment, and decontamination/neutralization materials and equipment to allow facility personnel to quickly and effectively respond to onsite emergencies. Emergency eye wash stations and showers are located throughout the plant. **Appendix B** of the complete plan presents itemized inventories and descriptions of the emergency equipment maintained at the facility and figures showing the locations where these items are located or stored. In the event that the onsite resources are not sufficient to respond to an emergency, then the EC will contact emergency agencies and response contractors as necessary for help.

5.0 EVACUATION PLAN

Any evacuation of the facility will be by the normal emergency evacuation procedures as posted within the buildings. This plan includes evacuation procedures for all areas of the plant whether involved in hazardous waste operations or not. **Figure 3** of this action package shows the overall plant-wide evacuation route plan for the facility. All personnel located south and immediately north of the railroad tracks will evacuate the facility and meet at the Administrative Building parking lot for roll call. All remaining personnel located north of the railroad tracks will evacuate the facility through the 26th Street gate and travel toward the Administrative Building parking lot for roll call. Detailed evacuation routes for each individual plant area are presented in **Appendix C** of the complete plan.

Each of the area evacuation plans denotes both primary and secondary evacuation routes for use in the event that fire or hazardous material/waste blocks the primary routes. Should evacuation of any building be required, all evacuated personnel will move to a designated assembly point away from the location of the emergency.

The signal to start any evacuation shall be given by the shift supervisor and/or the Emergency Coordinator. The signal to begin an evacuation will be transmitted by direct verbal communication or by two-way radios to supervisors in each production area.

If it is unclear whether or not to evacuate a particular area, the area should be evacuated until the Emergency Coordinator makes a determination. Any evacuation of the surrounding properties will be coordinated through the local fire and police departments.

TELEPHONE NOTIFICATION FORM FOR REPORTABLE RELEASES

Call the following agencies and provide the information indicated below to the extent it is known. (Do not delay notification in order to collect this information.)

National Response Center:	**1-800-424-8802**
Local Emergency Response Administering Agency:	**(323) 583-4821**
California State Warning Center:	**1-800-852-7550**
City of Vernon Department of Environmental Health:	**(323) 583-8811**

1. Name and phone number of the person making the report (notification):

2. Name and address of the facility:

   Exide Technologies
   Resource Recycling Division
   2700 South Indiana Avenue
   Vernon, California 90058
   (323) 262-1101

3. Type of incident (e.g., spill, fire, explosion):

4. Time, location, and duration of incident/release:

5. Names and quantities of any chemicals or substances released (to the extent known):

6. Identify any released materials that are listed as extremely hazardous substances in Appendix A of 40 CFR 355.

7. List media affected by the release (e.g., air, soil, water, offsite persons):

8. Identify any known or anticipated acute or chronic health problems and any advice regarding medical attention that may be necessary for exposed individuals:

9. Necessary actions to be taken as a result of the release (e.g., area evacuations):

10. Extent of injuries, if any:

11. Possible hazards to human health or the environment outside the facility:

CONTINGENCY PLAN IMPLEMENTATION REPORT

TO

THE CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

Department of Toxic Substances Control Reg. 3

9211 Oakdale Avenue

Chatsworth, California 91311

(To be submitted within 15 days of any incident requiring implementation of this Plan.)

Exide Technologies

Resource Recycling Division

2700 South Indiana Avenue

Vernon, California 90058

(213) 262-1101

1. Name and telephone number of individual making report:

2. Name and address of plant (see above).
3. Attach a copy of the Telephone Notification Report.
4. Estimated quantity and disposition of recovered material that resulted from the incident:

5. Cause of occurrence:

6. Period of occurrence, including exact dates and times:

7. Time occurrence expected to continue (if not already corrected):

8. Steps taken or planned to reduce, eliminate, and prevent recurrence:

California Emergency Release Follow-up Notice Reporting Form and Instruction Sheet

The following form is to be submitted to the California Chemical Emergency Planning and Response Commission (CEPRC) within 30 days of any release of a substance in excess of its reportable quantity which impacted soil or any offsite receptor (air, water, sewer, soil, or person).

APPENDIX B
EMERGENCY RESPONSE EQUIPMENT

TABLE B-3
EXIDE TECHNOLOGIES MOBILE EQUIPMENT LIST

Equipment Number:	Description	Department
21	Yale Forklift	Maintenance
476	Manlift (Bragg Crane)	Maintenance
493	Golf Cart	
497	Electrical Manlift	Maintenance
498	Ford Pick-up Model F-350	Maintenance
515	Ottawa Tractor Model YT30	Receiving
517	Sweeper - Tennant Model 95	Plant Services
518	Sweeper - Tennant Model 95	Plant Services
520	Ottawa Truck - Model 30	Shipping/Warehouse
527	Lincoln Welder - Diesel	Maintenance
528	Miller Welder - Gasoline	Maintenance
531	Golf Cart	Maintenance
539	Waldon	Blast
540	SISU	RMPS
548	Komatsu Fork Truck	Shipping
550	Komatsu Fork Truck	Shipping
551	Komatsu Fork Truck	Shipping
557	Tennant Scrubber	Environmental
558	Tennant Scrubber	Environmental
562	Golf Cart	

TABLE B-5
OUTSIDE SOURCES FOR EQUIPMENT AND MATERIALS

Item	Supplier	Telephone	Contact
Soda Ash	Searles Valley 13200 Main Street Trona, CA 93592-0367	(760) 372-2291 (800) 424-9300	Dave Barrett (CHEMTREC)*
Potassium Hydroxide **Flake, Caustic Soda** **Flake, Sulfuric Acid,** **Sulfur, Sodium Nitrate** **Ferric Chloride Solution**	Miles Chemicals 12801 Rangoon Arleta, CA 91331	(818) 504-3355 (800) 424-9300	Gary Marka (CHEMTREC)*
Liquid Caustic Soda	BCS. 12522 Los Nietos Road Santa Fe Springs, CA 90670 Pioneer 700 Louisiana St., Suite 4650	(565) 944-7244 (800) 424-9300 (800) 343-2388 (800) 334-9503 (800) 424-9300	John Grimes Gene Van Dyke George Gray (CHEMTREC)* 24 hr emergency Number 24 hr emergency Number Houston, TX 77002 (314) 598-2850 Kevin Gregory (CHEMTREC)*
Liquid Oxygen	BOC Gasses 680 N. Baldwin Park Blvd. City of Industry, CA 91746-1501	(626) 369-2886 (800) 232-4726	Jim Smith Emergency Number

* CHEMTREC is an emergency information provider contracted by chemical supply companies. They can provide information regarding the hazards associated with different chemical spill scenarios.

TABLE B-5
OUTSIDE SOURCES FOR EQUIPMENT AND MATERIALS
(Continued)

Item	Supplier	Telephone	Contact
Propane	Ted Johnson 5140 North Elton Baldwin Park, CA 91706	(626) 337-1222	Ramon Diaz
Diesel Fuel	Southern Counties Oil Co. 1825 West Collins Orange, CA 92670	(800) 633-8253 (800) 255-3924 (714) 744-7140	24 hr Emergency Response Transportation Emergency
Munivez PM 605 (inhibitor), OX 103 (biocide), NC 106 (biocide)	Long Beach, CA 90815	(562) 602-7251	Steve Lenhart
Skip Loaders, **Cranes**	Bob Hill Hydraulic Crane 1390 East Burnett Street Suite B Long Beach, CA 90806-3599	(562) 426-6445 (800) 924-6445	24 hr. ans. service will xfer you to person on-call.
Miscellaneous Equipment	Economy Rentals 5511 Whittier Blvd. Los Angeles, CA 90022	(213) 723-9737 (323) 728-8259	John Meek Russ John Meek (24 hr number)
Tank Trucks	Bulk Transportation 415 S. Lemon Ave. Walnut, CA 91789-2911	(909) 594-2855	
Tank Trucks, Dump Trucks, Manpower, Earth Moving Equipment	OC Vacuum 4317 Downey Road Vernon, CA 90058	(323) 587-0234	

TABLE B-5
OUTSIDE SOURCES FOR EQUIPMENT AND MATERIALS
(Continued)

Item	Supplier	Telephone	Contact
Hazardous Waste Management Assistance	Env. Recovery Services, Inc. 2650 Lime Avenue Signal Hill, CA 90806	(562) 427-7277	Debbie Avots
Environmental and Geotechnical Engineering, Soil Coring and Boring, Soil Sampling,	E2 Environmental, Inc. 15375 Barranca Parkway, B-202 Irvine, California 92618-2213	(949) 453-8085	Dennis England dcengland@e2env.com
Lab Analysis			
	Advanced GeoServices 1055 Andrew Drive, Suite A West Chester, PA 19380	(610) 840 9100	Paul Stratman
	Calscience Environmental Laboratories 7440 Lincoln Way Garden Grove, CA 92841-1432	(714) 895 5494	Kim Banks
Emergency Response	Advanced Cleanup Technologies, Inc. 18414 S. Santa Fe Avenue Rancho Dominguez, CA 90221	(310) 763-1423	Pete Espanza
	Environmental Recovery Services 2650 Lime Avenue Signal Hill, CA 90806	(562) 427-7277	Debbie Avots Jim Scott

TABLE B-6
EMERGENCY EQUIPMENT LIST

On Site	Description / Capabilities	Location
Fire Extinguishers	General Firefighting	Throughout Plant see **Table B-1**,and **Figure B-1**
Fire Hoses (7 each)	General Firefighting	See **Figure B-1**
Fire Hydrants (5 each)	General Firefighting	See **Figure B-1**
First Aid Kits	Minor Emergency First Aid	Plant Services Maintenance Shop RMPS C-P1 Smelting C-P2 Refining C-P4 Administration Mobile Maintenance
AED Units	Emergency First Aid	Smelting C-P2 Main Guard Station
Soda Ash	Acid Neutralization	See **Figure B-1**
Mobile Equipment	Moving Pallets and Bulk Materials	Throughout Plant (See **Table B-3**)
Telephones	Coordination and Control	Administrative Building Guardhouses Scalehouse Smelting Building Refinery Garage Water Softening Building
	Buildings	Employee Facilities RMPS Laboratory Maintenance Shop
Two-Way Radios (20 each)	Coordination, Control, and Alarm Communications	Throughout Plant

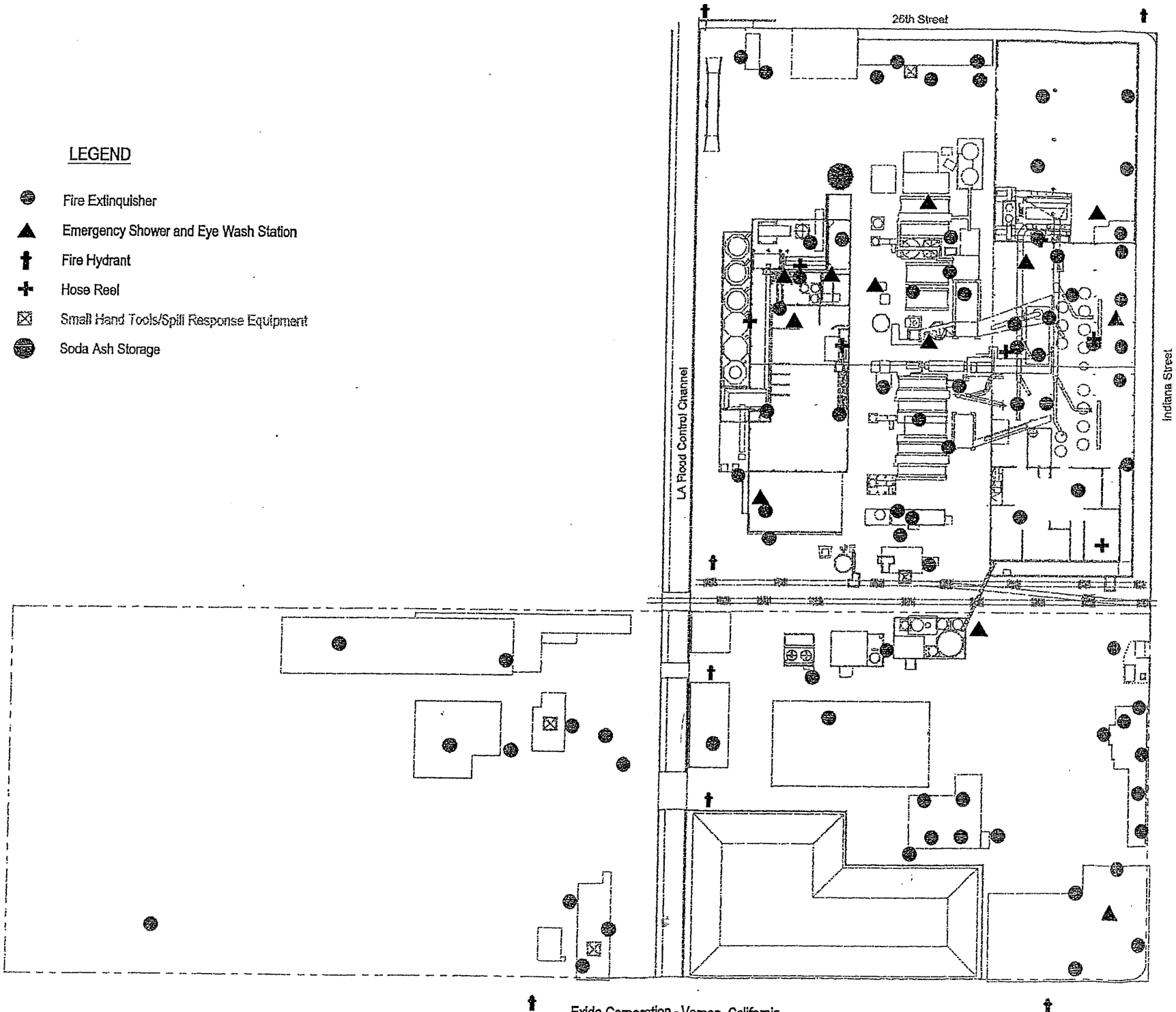
TABLE B-7: STORED CHEMICAL LOCATIONS

No.[+]	Location	Chemicals
1	Diesel Aboveground Storage Tank	Diesel
2	BESS	Lead-acid Batteries - (Spent)
3	Sulfuric Acid Totes (4)	Sulfuric Acid
4	Finished Lead Storage Building	Lead Pigs and Ingots
5	Soda Ash Storage Tank	Soda Ash
6	Caustic Tank	Caustic Soda
7	Ferric Chloride Tank	Ferric Chloride
8	RMPS	Lead Lead Carbonate Soda Ash Sulfuric Acid
9	Reverb Furnace Feed Room	Lead Lead Carbonate (Raw Materials) Red Base Sweeping Compound
10	Smelter Building	Aluminum Calcium Caustic Soda Charcoal Arsenic Sulfur Potassium Hydroxide
11	Canopied Container Receiving Building	Open - Bin 101-102
12	Liquid Nitrogen Tank	Liquid Nitrogen
13	Caustic Tank	Caustic Soda
14	Lube/Oil Building	Hydraulic Oils
15	Blast Furnace Feed Room	Blast Slag Coke Iron Lead Reverb Slag Dross (Tin, Antimony)
16	West Container Receiving Building #2	Lead Acid Batteries - (Spent)
17	West Container Receiving Building #1	Lead Acid Batteries - (Spent)
18	Central Container Receiving Building	Lead Acid Batteries - (Spent)
19	Wastewater Treatment Plant	Sodium Carbonate Molybdate Phosphate Polymer Salt Aqua Floc 406, 2402C
20	Propane Tank	Propane
21	Engineering Building Water Lab*	Acetic Acid Acetone Acetylene Argon Nitric Acid Methanol
22	Warehouse*	Paint Paint Thinner
23	Machine Shop	Acetylene Cleaning Solvent Oxygen
24	Electrical Shop	Acetylene Hydraulic Fluid Oxygen
25	Mobile Maintenance (Garage) Building	Diesel Fuel Cleaning Solvent Hydraulic Fluid Motor Oil
26	Chemical Storage Area	Sulfur, Tin, Metal, Arsenic, Calcium, Copper, Antimony, Selenium

[+] Numbers refer to plant areas as shown on Figure B-3 * Small quantities

LEGEND

- Fire Extinquisher
- Emergency Shower and Eye Wash Station
- Fire Hydrant
- Hose Reel
- Small Hand Tools/Spill Response Equipment
- Soda Ash Storage



North

0 50
10 25 100
Scale In Feet

Exide Corporation - Vernon, California

LOCATIONS OF ALL EMERGENCY EQUIPMENT

FIGURE B-1

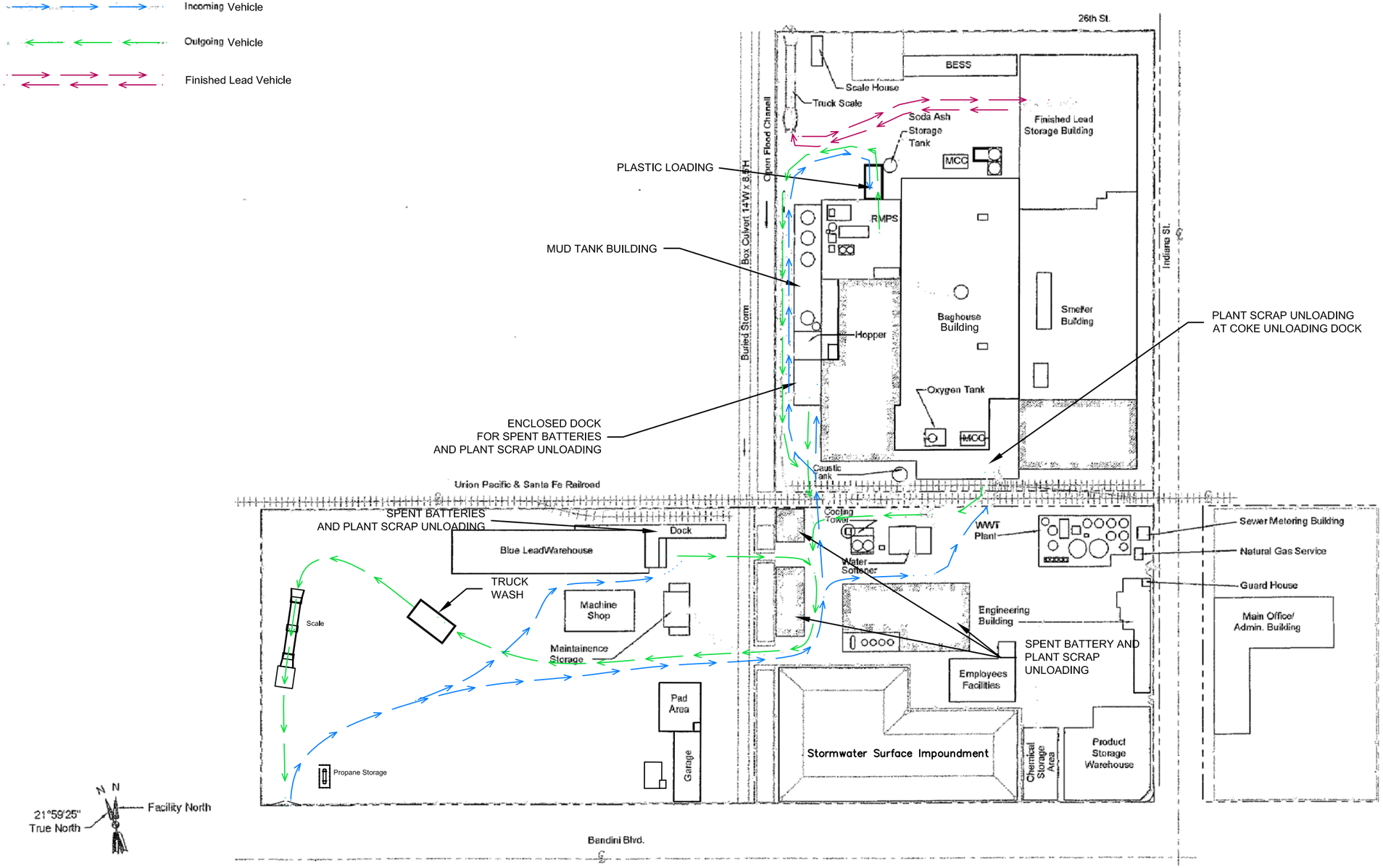
490-318 1=100 col 10-17-00 NBM 490-40556 JAP Part B 2000

LEGEND

Incoming Vehicle

Outgoing Vehicle

Finished Lead Vehicle



NOTE:

1. ADAPTED FROM LAKE ENGINEERING FIGURE 2.4 FROM PART B APPLICATION, MAY 2002.

ADVANCED GeoServices

Engineering for the Environment. Planning for People.™

1055 ANDREW DRIVE, SUITE A, WEST CHESTER PA, 19380
tel 610.840.9100 fax 610.840.9199 www.advancedgeoservices.com

TRAFFIC PATTERNS

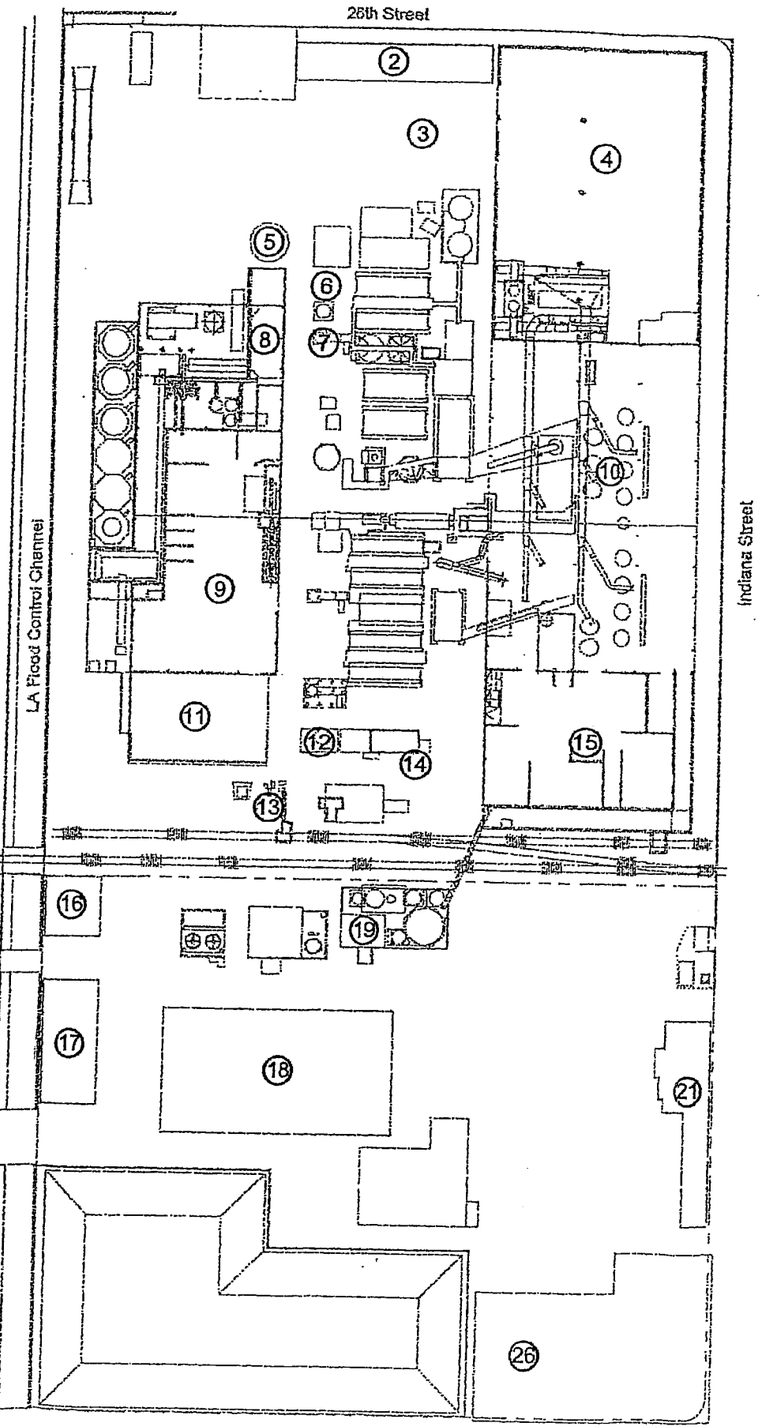
Exide Technologies
Vernon, California

SCALE:	N.T.S.
PROJECT NUMBER:	2013-2993-01
DATE:	8/4/14

Figure B-2

LEGEND

① Chemical Storage Locations: See Table B-7 for a List of Chemicals Stored at Each Location.



North

0 50
10 25 100
Scale in Feet

490-319 1=100 osl/regen 10-17-00 NBM 460,A0955 JAP Part B 2000

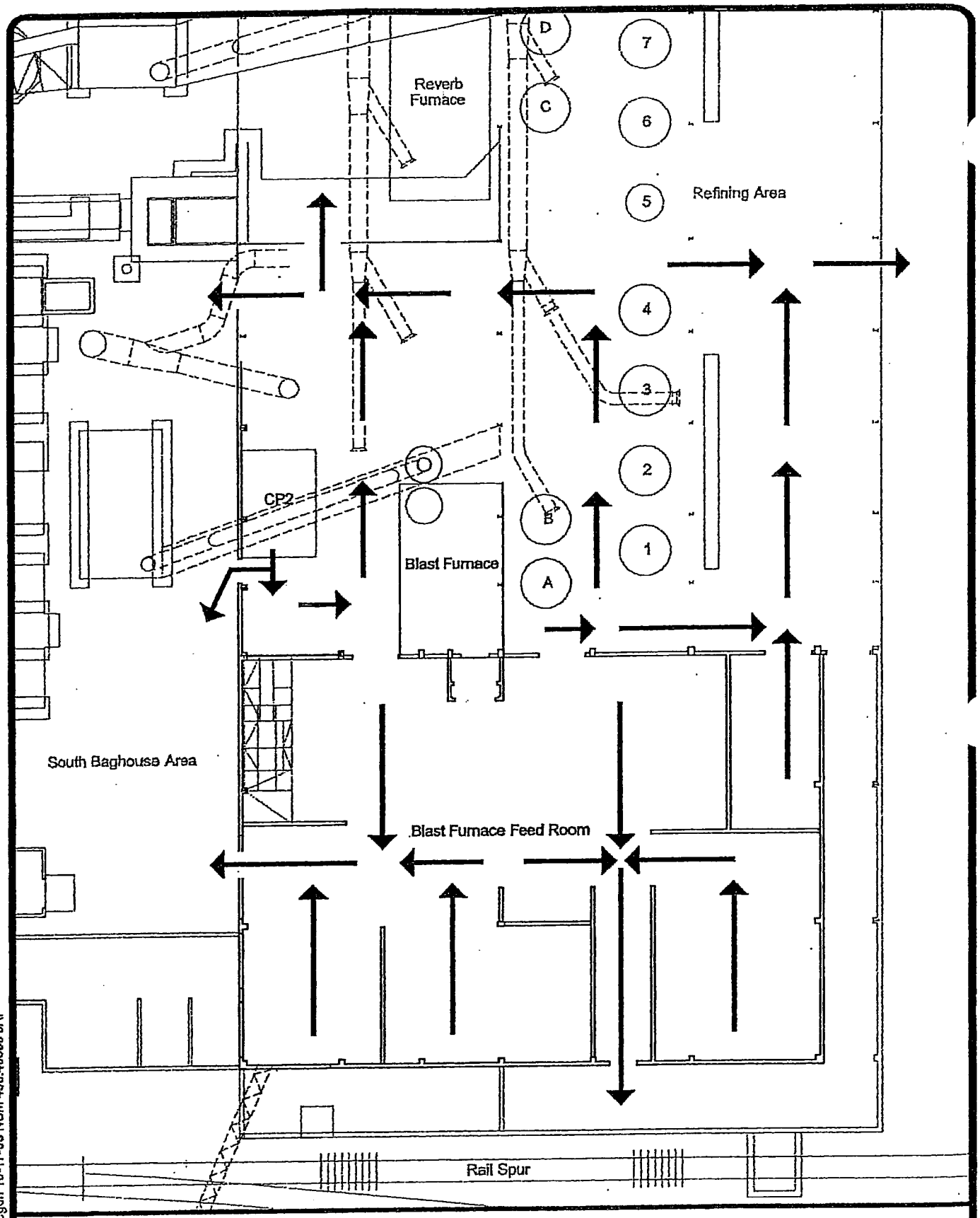
Exide Corporation - Vernon, California

CHEMICAL STORAGE LOCATION PLAN

FIGURE B-3

APPENDIX C

EVACUATION ROUTES



Personnel Evacuation Direction For This area

Area Roll Call : Scrubber

Plant Wide Roll Call : Administration Parking Lot

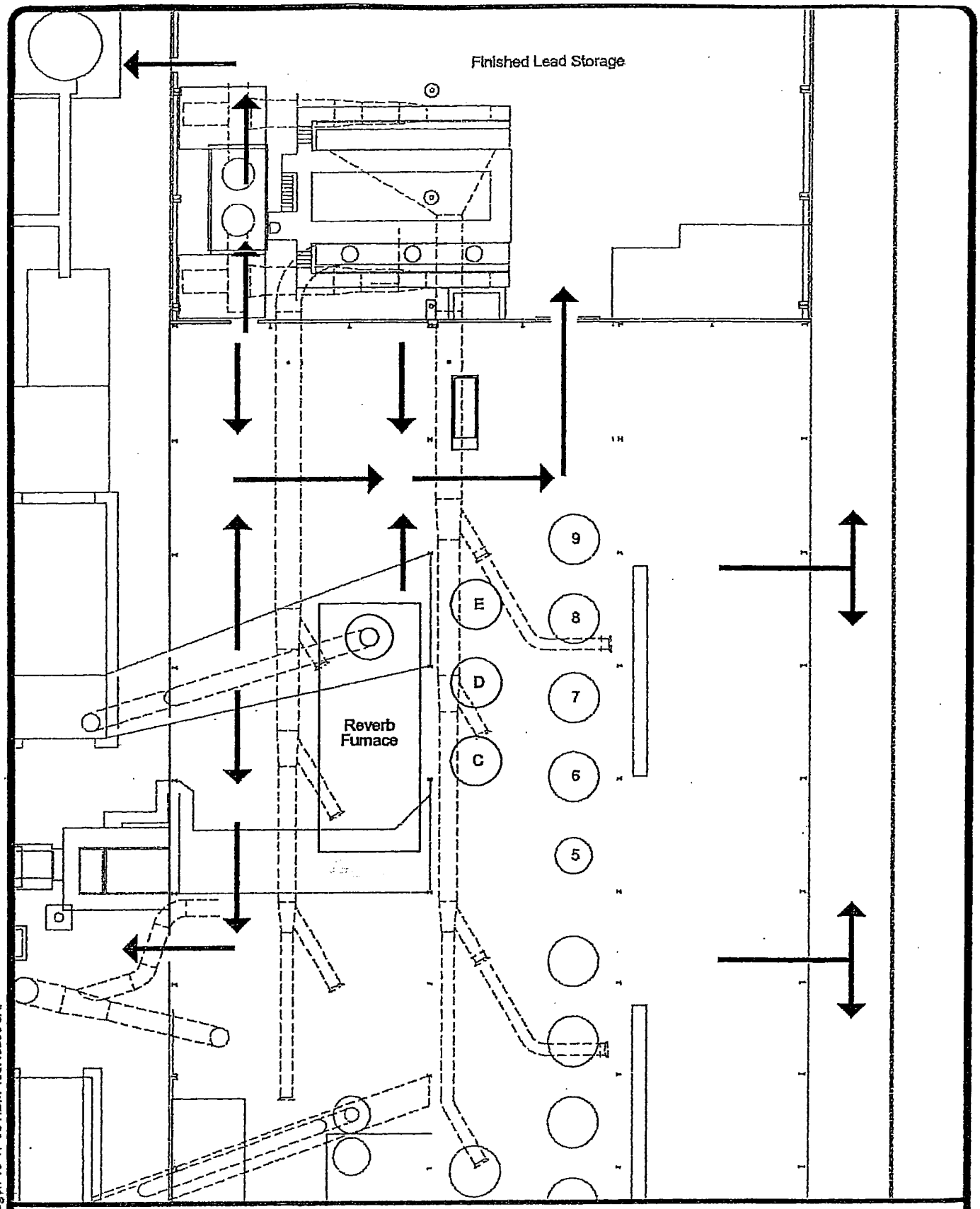
490-312A 1=30 col/regen 10-17-00 NBM 490.40556 JAP

Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES BLAST FURNACE AREA

FIGURE C-1



Personnel Evacuation Direction For This area

Area Roll Call : Scrubber

Plant Wide Roll Call : Administration Parking Lot

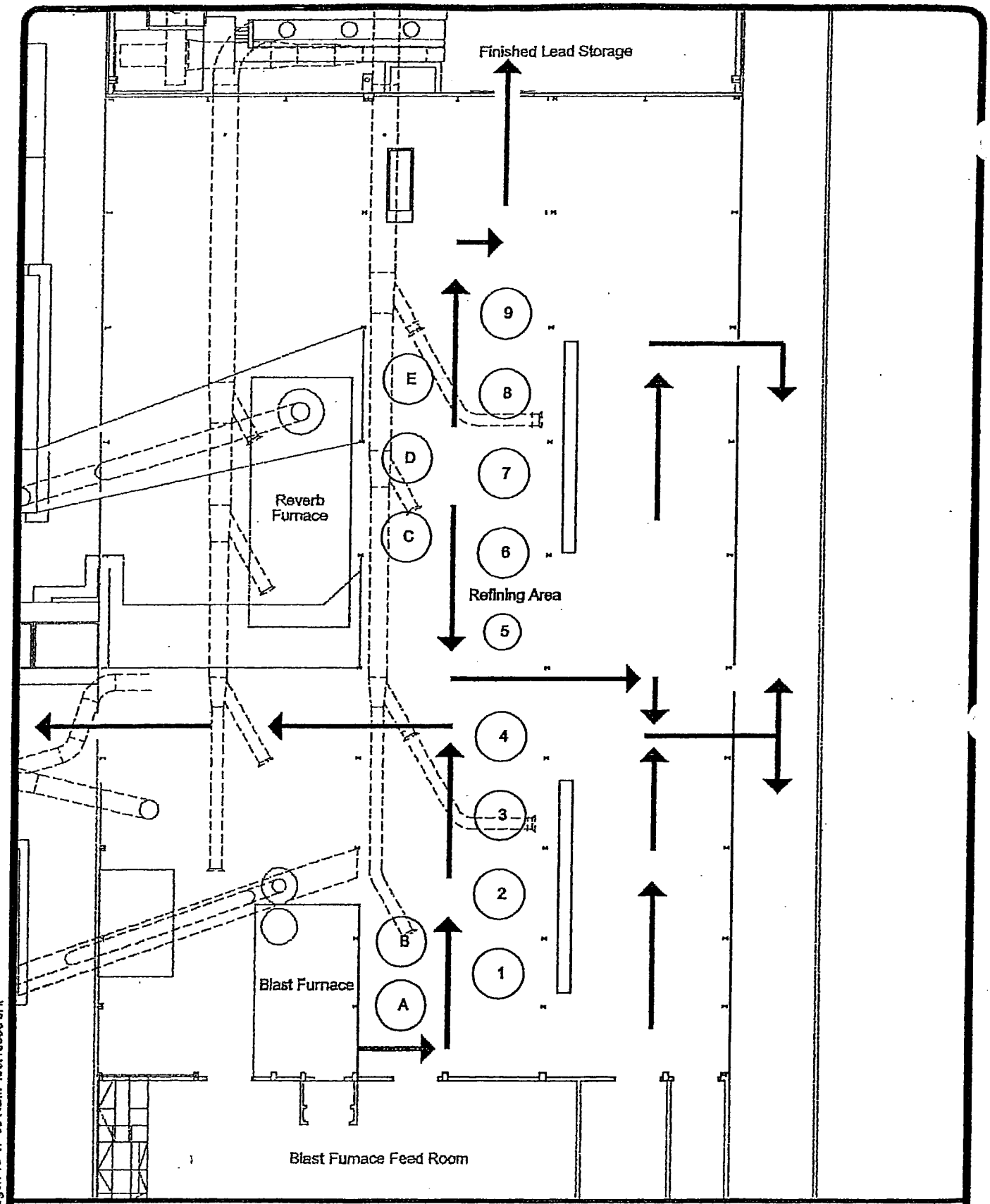
490-312B 1=30 col/regen 10-17-00 NBM 490.40556 JAP

Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES REVERB FURNACE AREA

FIGURE C-2



Personnel Evacuation Direction For This area

Area Roll Call: North Yard

Plant Wide Roll Call: Administration Parking Lot

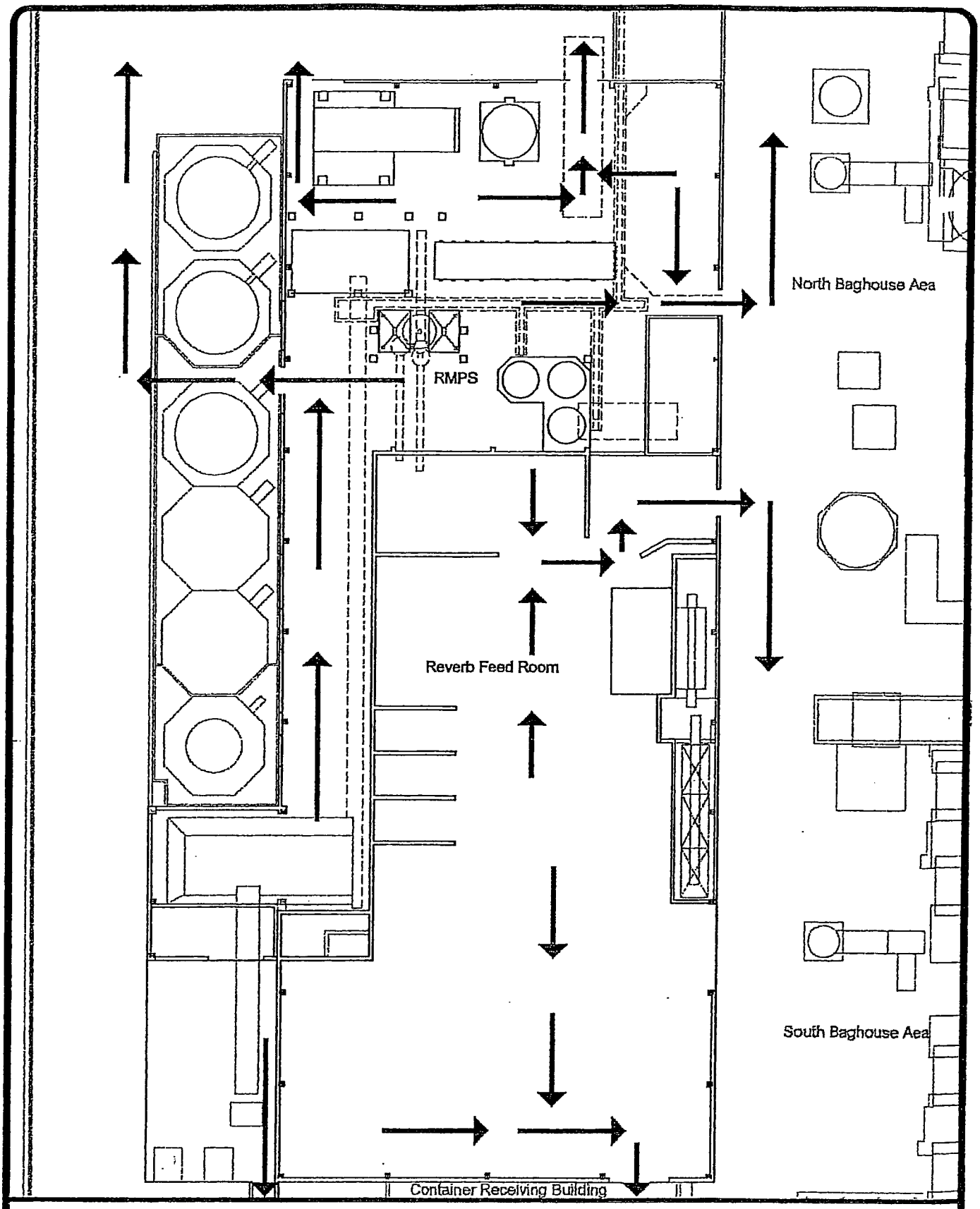
490-312C 1=30 col/regen 10-17-00 NBM 490.40556 JAP

Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES REFINING AREA

FIGURE C-3



Personnel Evacuation Direction For This area

Area Roll Call: North Yard

Plant Wide Roll Call:
Administration Parking Lot

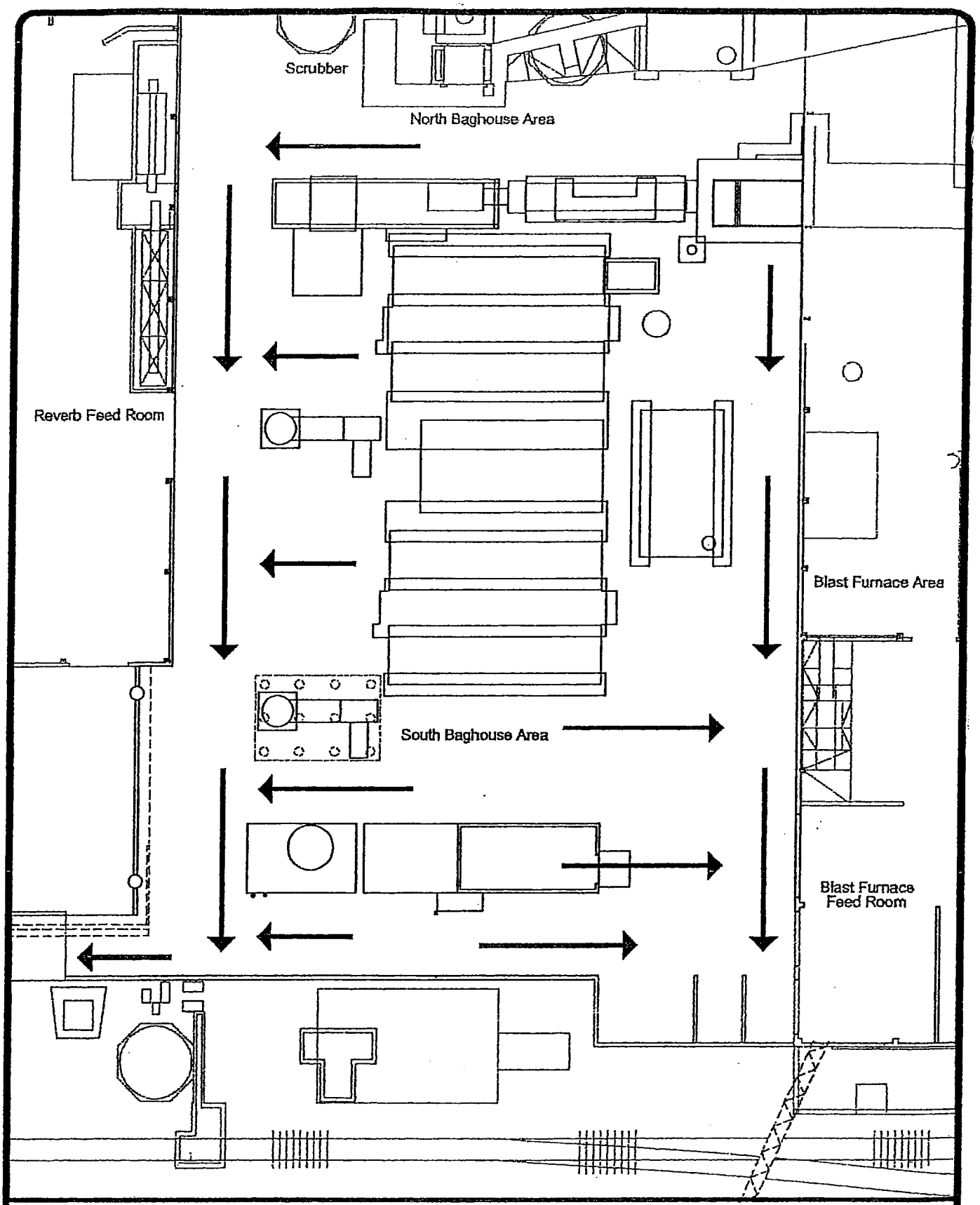
490-312D 1=30 col/regen 10-17-00 NBM 490.40558 JAP

Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES RMPS/REVERB FEED AREAS

FIGURE C-4



Personnel Evacuation Direction For This area

Area Roll Call: North Yard

Plant Wide Roll Call:
Administration Parking Lot

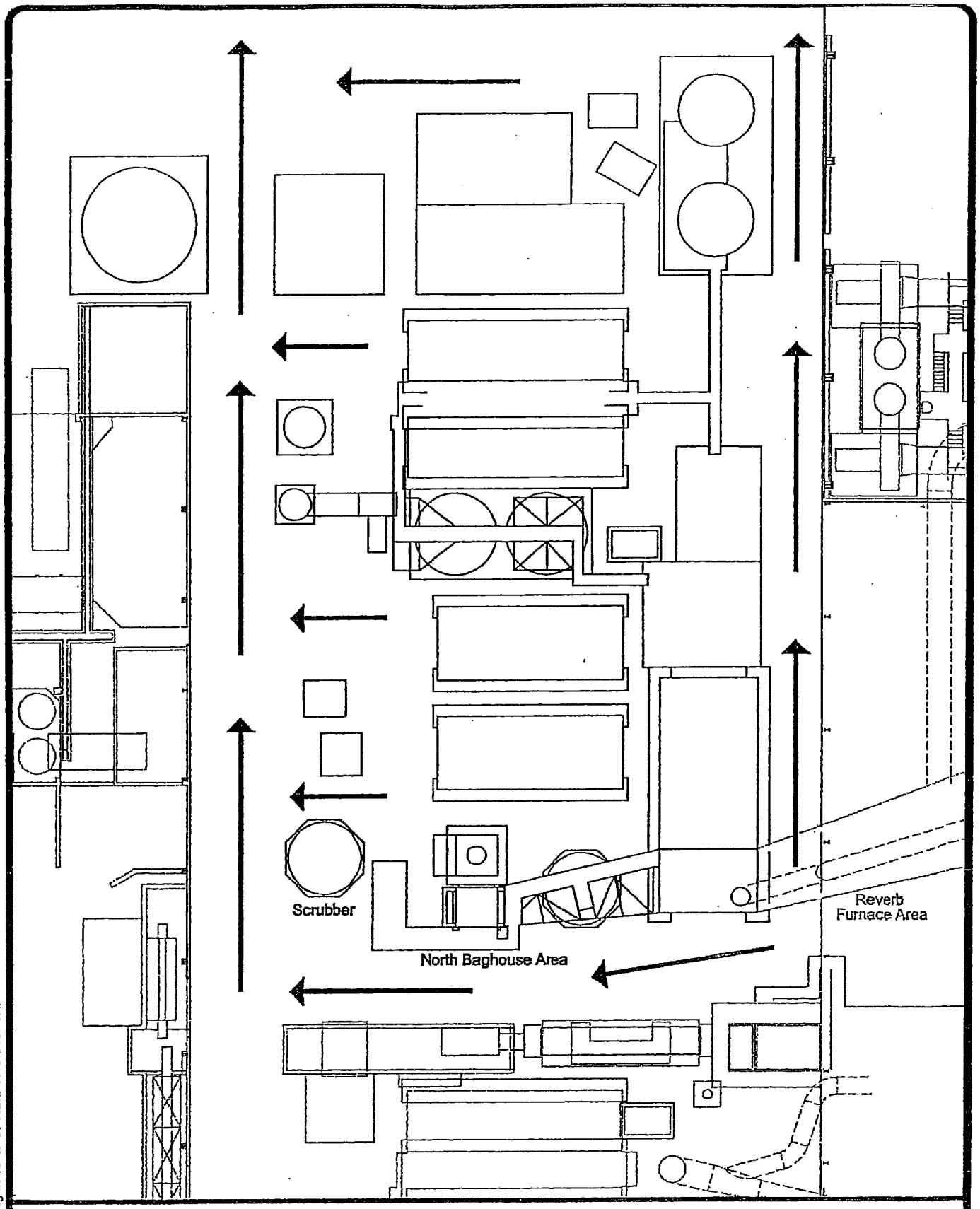
490-312E 1=30 coltregen 10-17-00 NBM 490.40556 JAP

Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES SOUTH BAGHOUSE AREA

FIGURE C-5



Personnel Evacuation Direction For This area

Area Roll Call: North Yard

Plant Wide Roll Call:
Administration Parking Lot

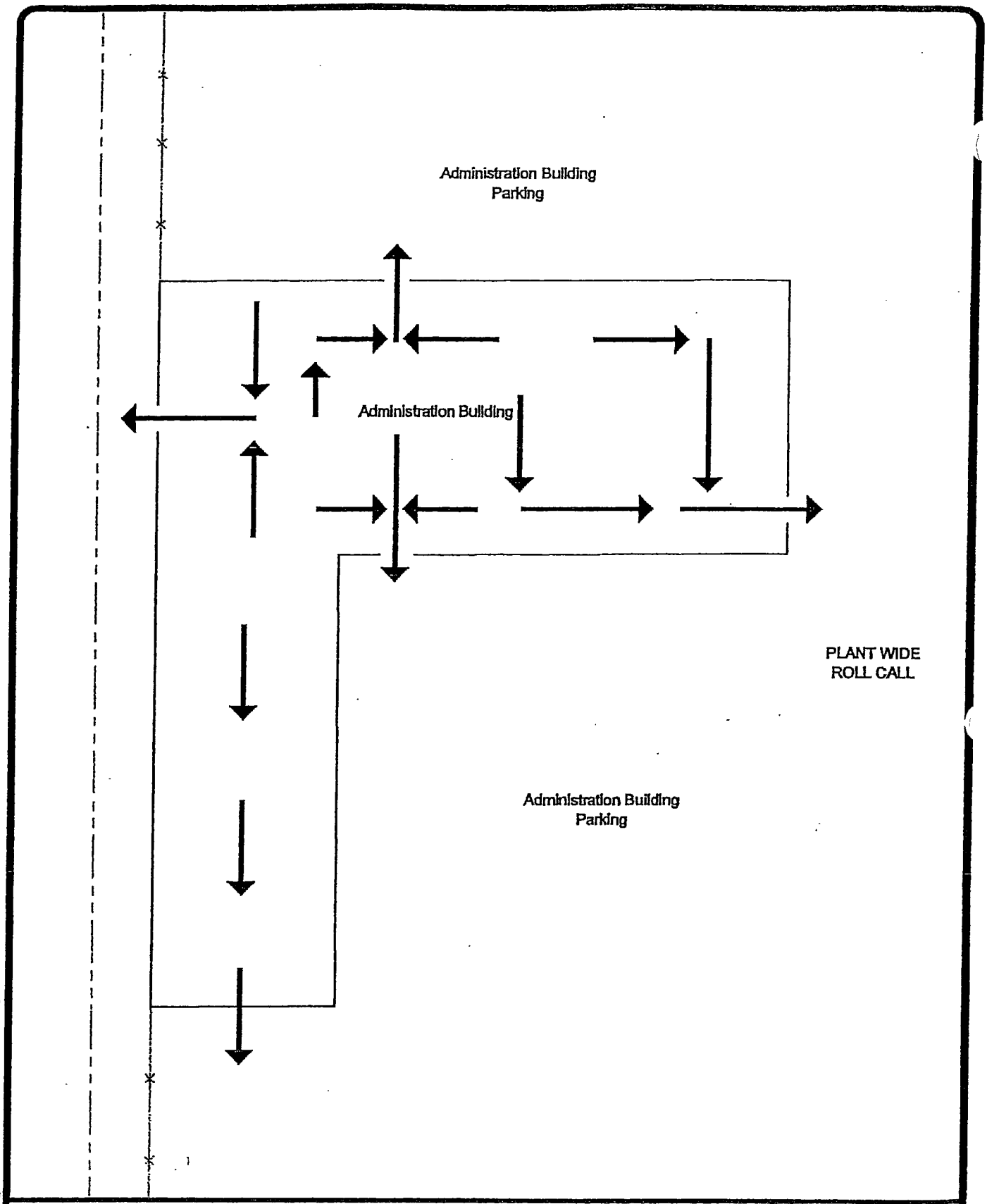
490-312F 1=30 col/regen 10-17-00 NBM 490.40556 JAP

Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES NORTH BAGHOUSE AREA

FIGURE C-6



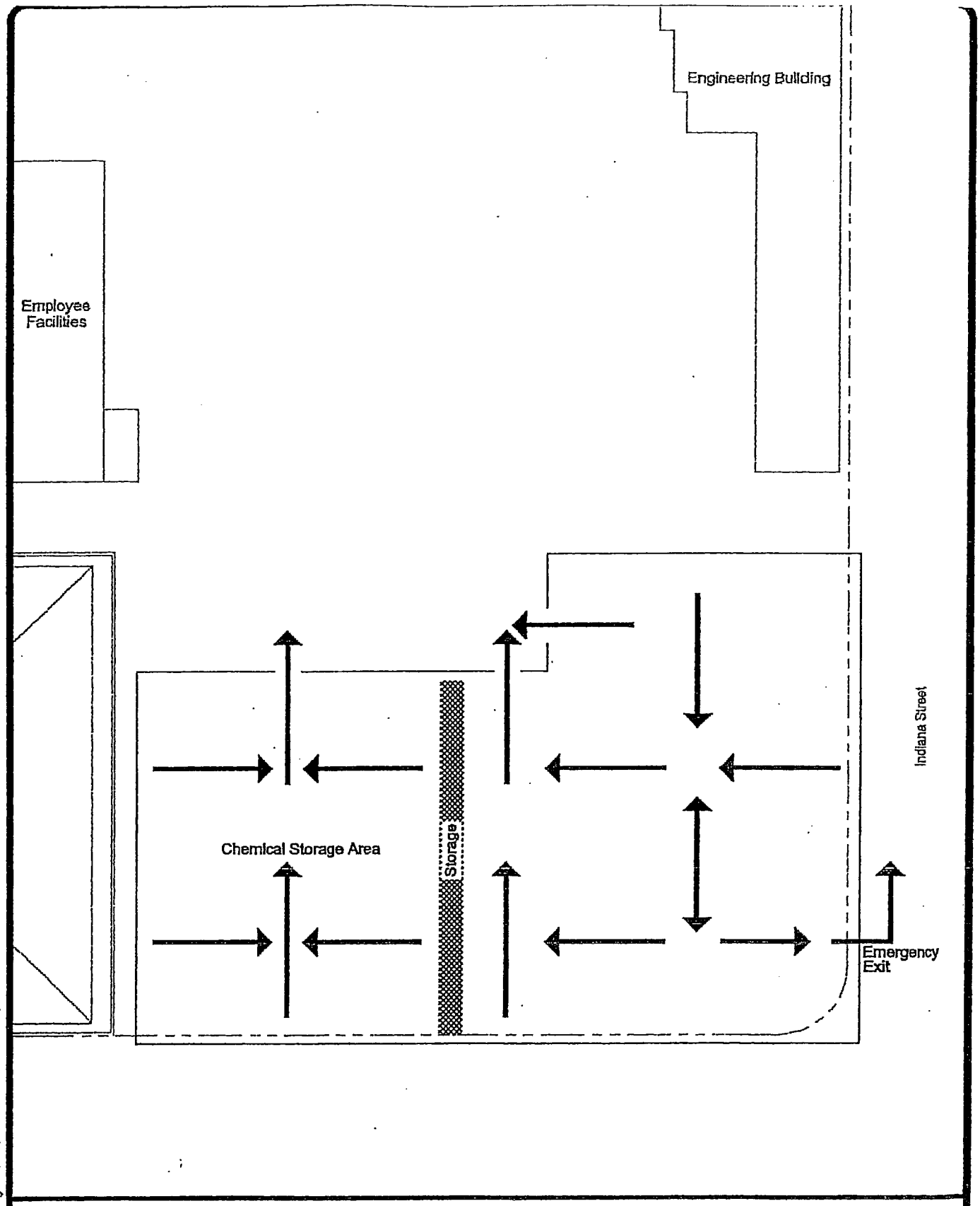
490-312G 1=30 col/regen 10-17-00 NBM 490.40556 JAP

Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES ADMINISTRATION BLDG.

FIGURE C-7



← Personnel Evacuation Direction For This area

Area Roll Call:
Road North of Gate

Plant Wide Roll Call:
Administration Parking Lot

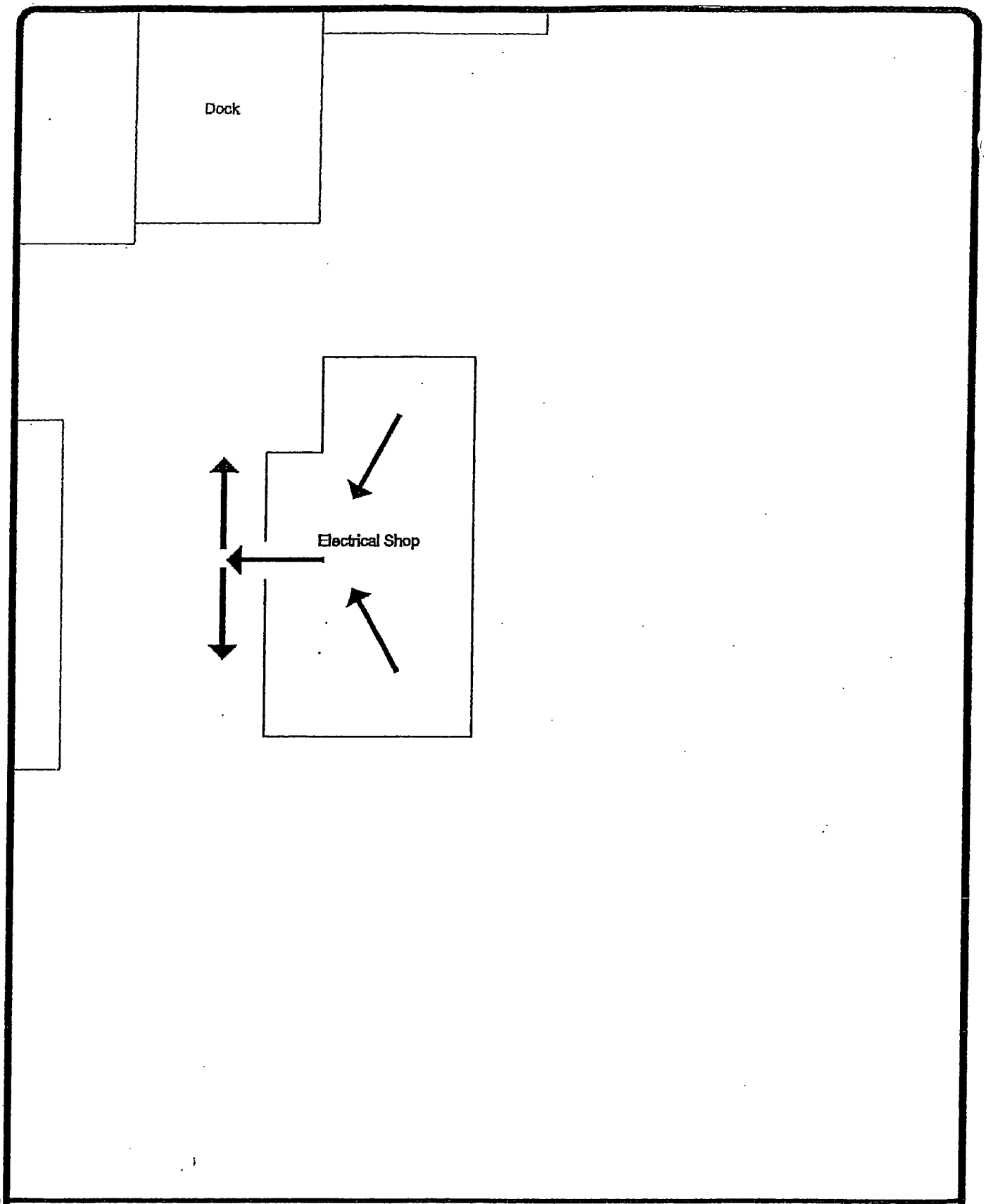
Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES CHEMICAL STORAGE AREA

FIGURE C-8

490-312H 1=30 col/regen 10-17-00 NBM 490.40556 JAP



Personnel Evacuation Direction For This area

Area Roll Call: West Yard

Plant Wide Roll Call:
Administration Parking Lot

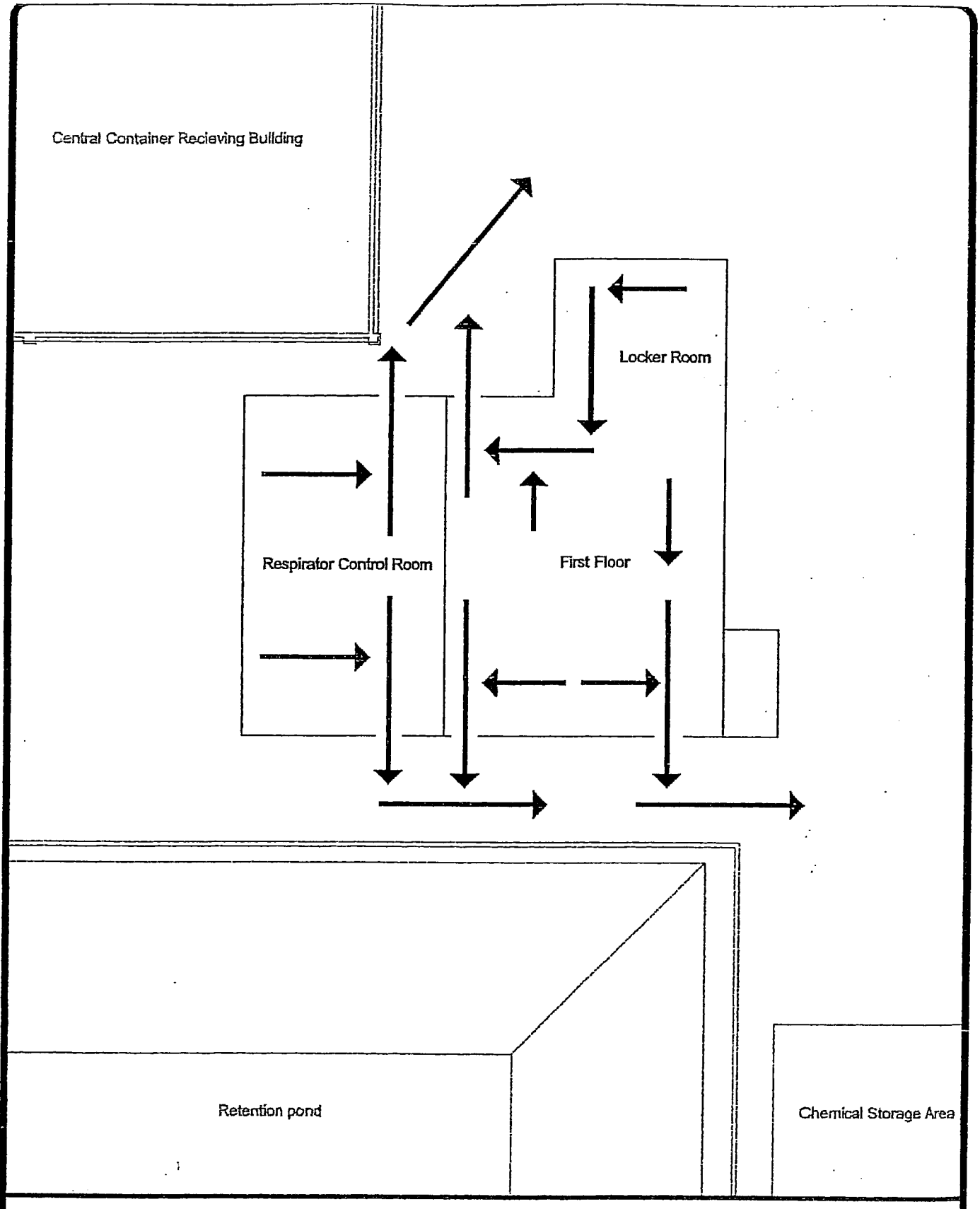
Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES ELECTRICAL SHOP AREA

FIGURE C-9

490-3121 1=30 col/regen 10-17-00 NBM 490.40566 JAP



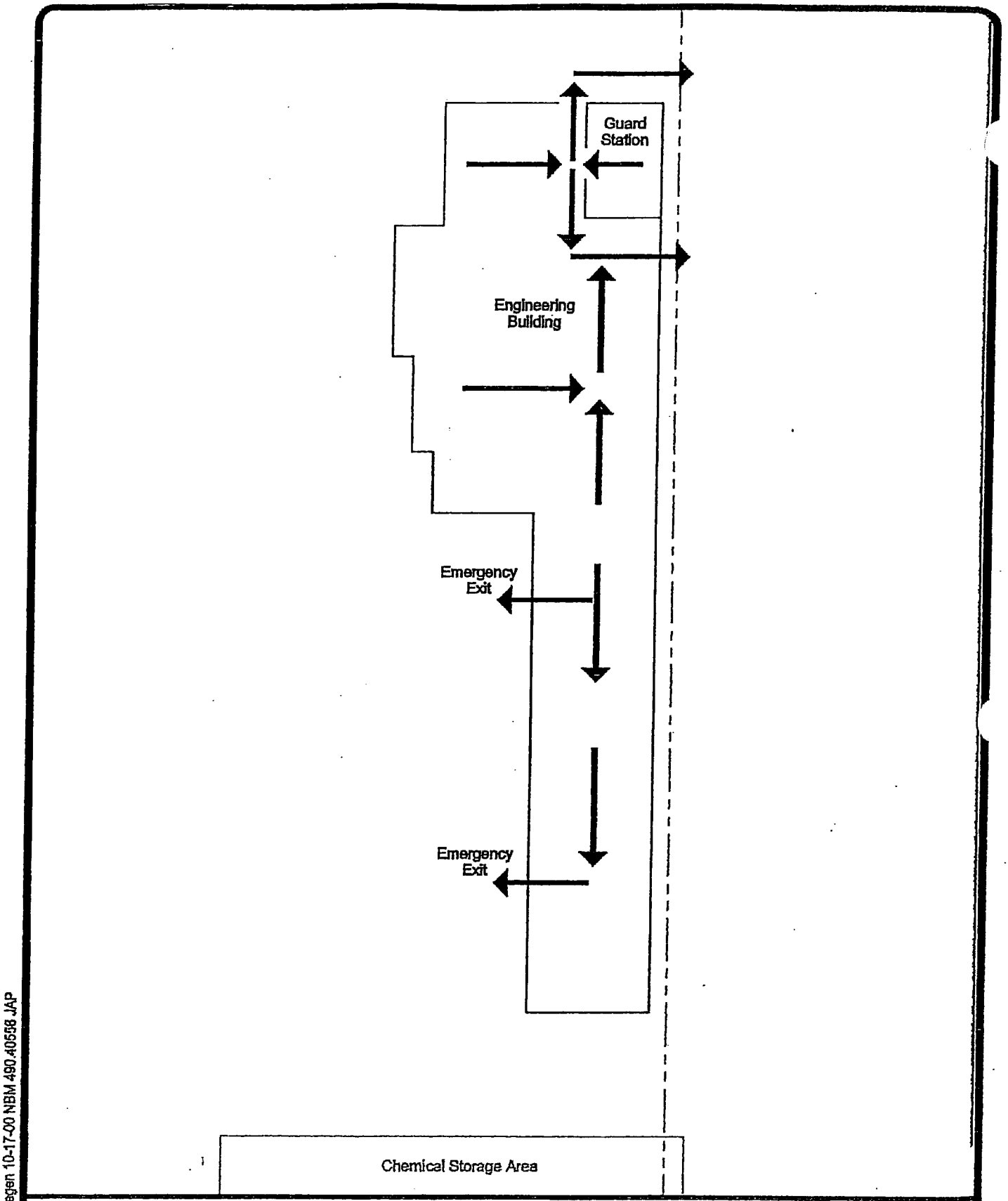
490-312J 1=30 cd/regen 10-17-00 NBM 490.40556 JAP

Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES EMPLOYEE FACILITIES AREA

FIGURE C-1



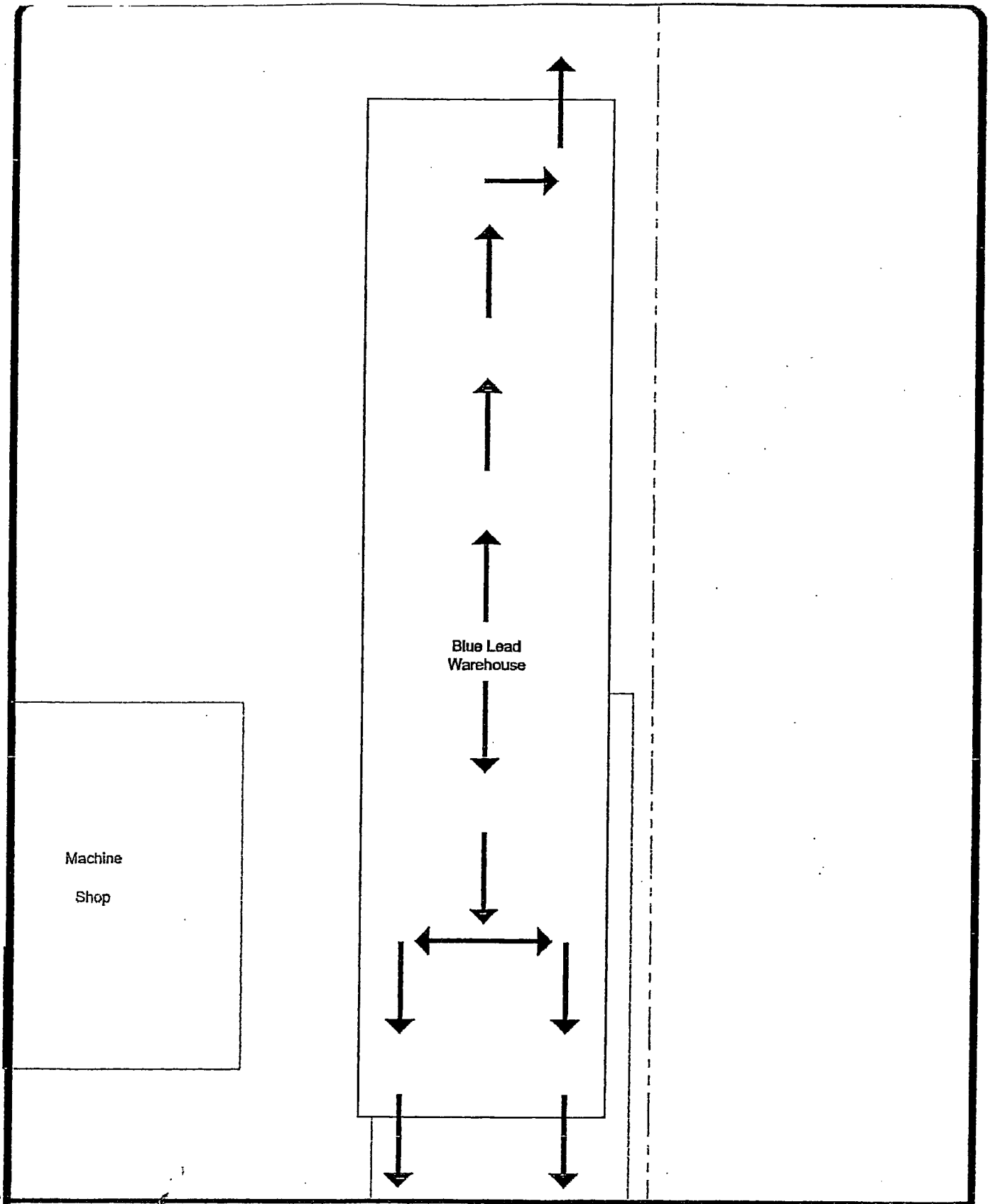
490-3112K 1=30 colnegen 10-17-00 NBM 490.40558 JAP

Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES ENGINEERING BUILDING

FIGURE C-11



Personnel Evacuation Direction For This area

Area Roll Call: West Yard

Plant Wide Roll Call:
Administration Parking Lot

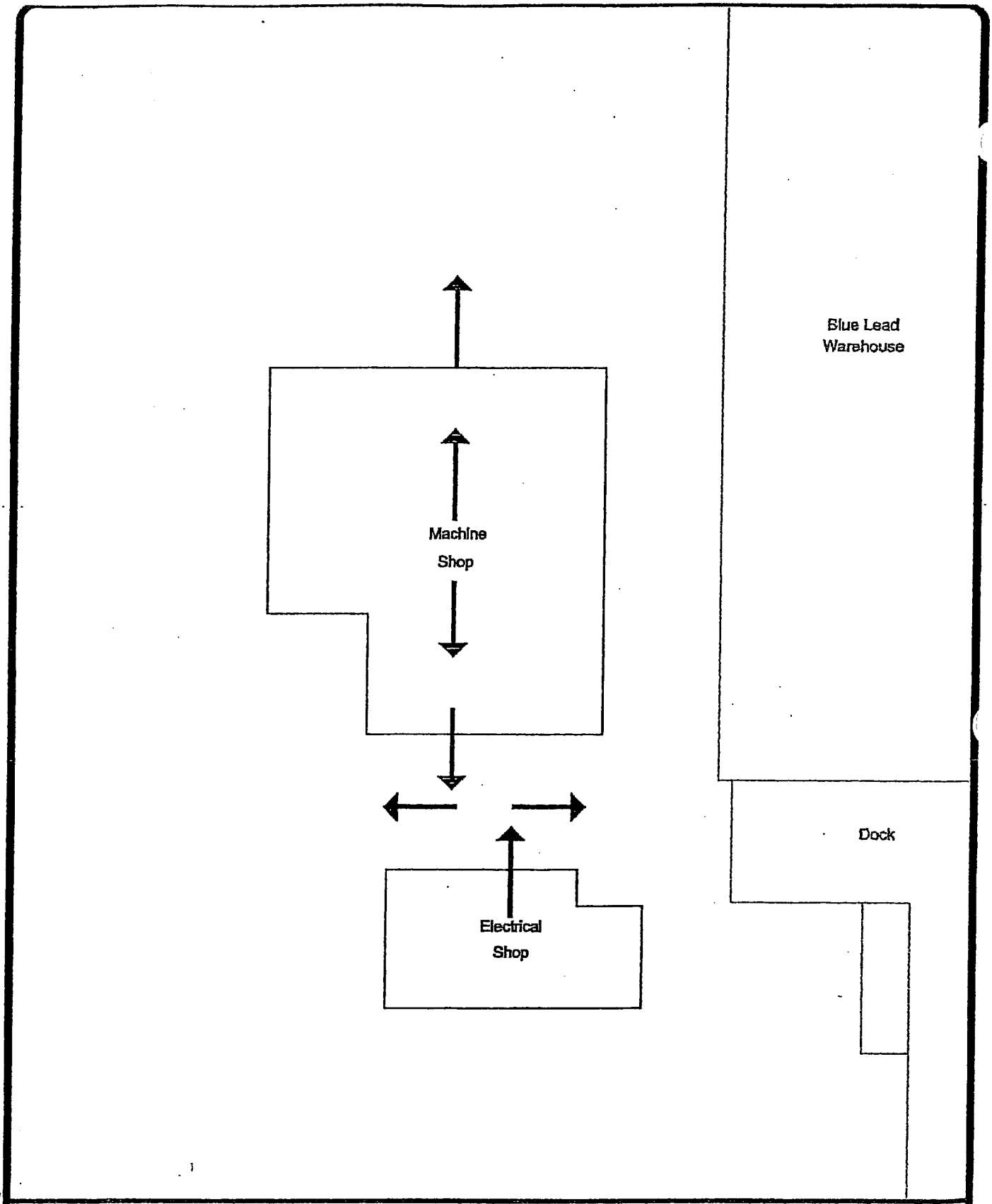
Exide Corporation - Vernon, California

EVACUATION ROUTES
WAREHOUSE AREA

Not To Scale

FIGURE C-1

490-312L 1=30 col/regen 10-17-00 NBM 490.40556 JAP



Personnel Evacuation Direction For This area

Area Roll Call: North of Building

Plant Wide Roll Call:
Administration Parking Lot

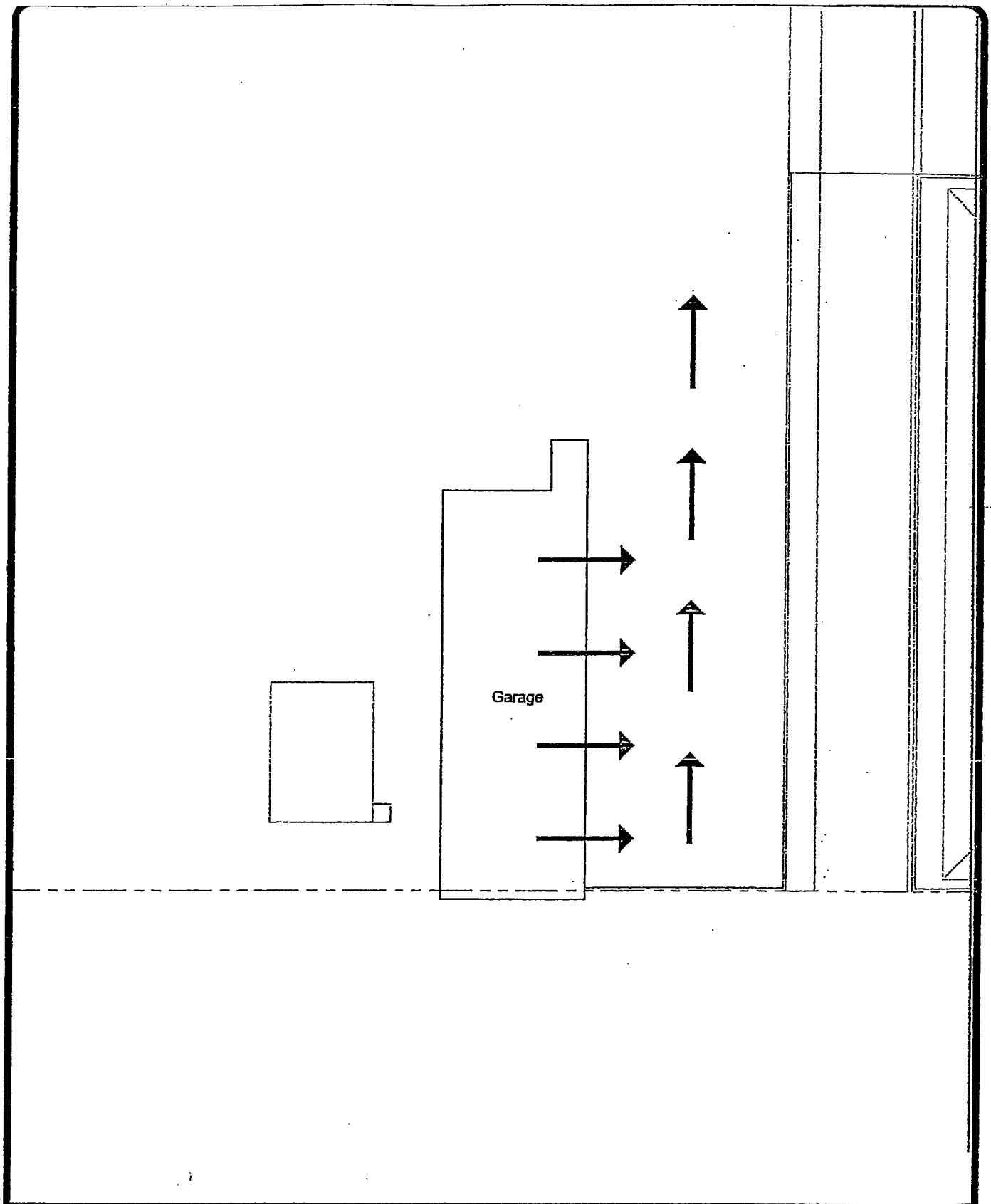
Exide Corporation - Vernon, California

Not
To
Scale

EVACUATION ROUTES
MACHINE SHOP AREA

FIGURE C-13

490-312M 1=30 col/regen 10-17-00 NBM 490.40556 JAP



Personnel Evacuation Direction For This area

Area Roll Call At The Scrubber

Plant Wide Roll Call At The Administration Parking Lot

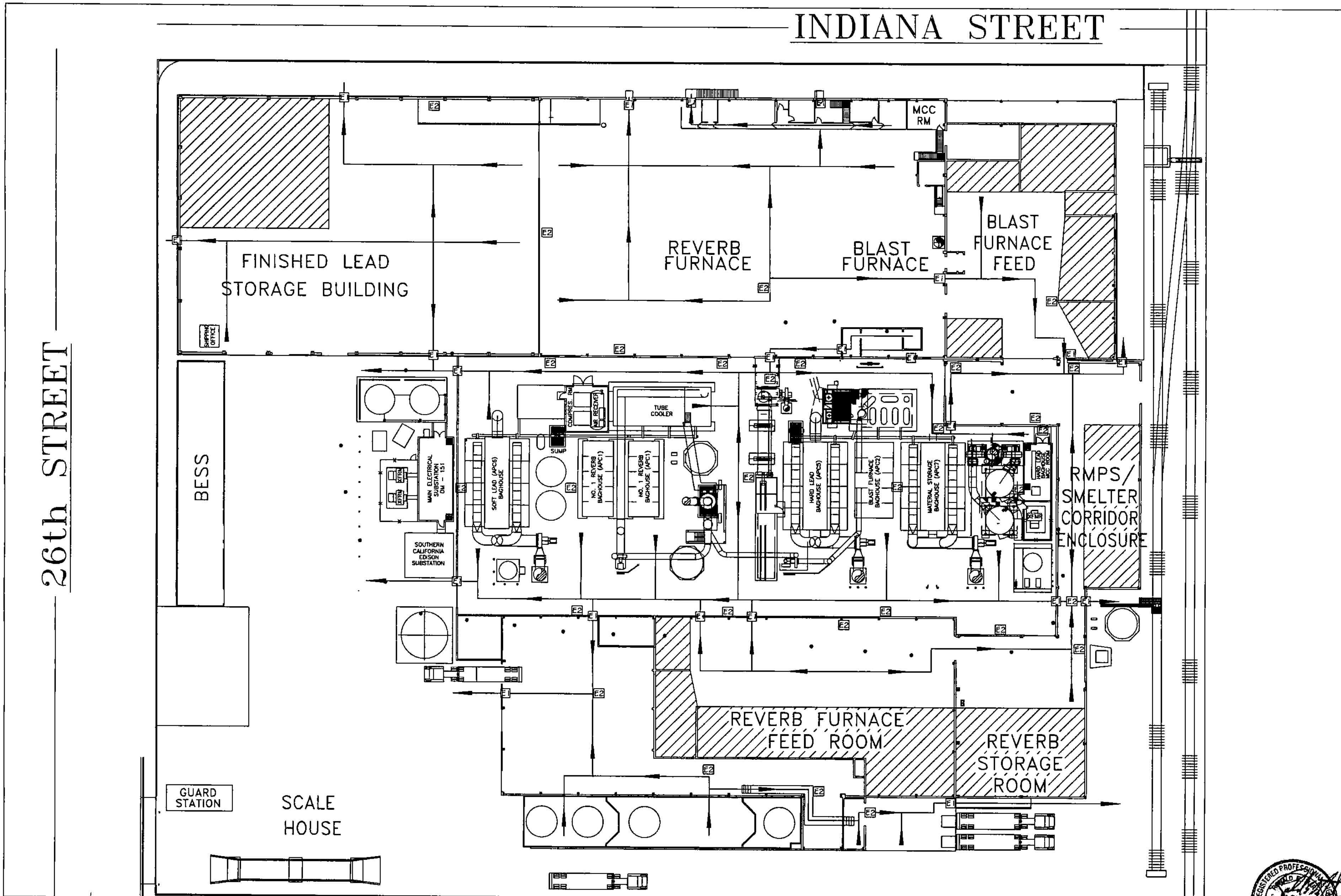
Exide Corporation - Vernon, California

Not To Scale

EVACUATION ROUTES GARAGE AREA

FIGURE C-14

490-312N 1=30 col/regen 10-17-00 NBM 490.40556 JAP



LEGEND	
E1	LUMINOUS EXIT SIGN WITH BATTERY BACKUP
E2	LUMINOUS EXIT DIRECTION SIGN WITH BATTERY BACKUP
//////////	UNOCCUPIED SPACE, USED FOR RAW MATERIAL STORAGE

(1) FIRE EXIT PLAN
Scale: 1/32"=1'

ADVANCED CONSTRUCTIONS, CORP.

NO.	DATE	REVISION	BY	CH'D.	DATE
	7-13-11	MISC CHANGES TO FIRE EXIT PATHS	RBB		

PERMIT APPLICATIONS INFORMATION
AIR
WATER
BLDG.

DRAWING RECORD INFORMATION
Randy Brown II — July 13, 2011
SCALE ¼" = 1'

EXIDE TECHNOLOGIES, Inc. — AUTOMOTIVE BATTERY DIVISION ATLANTA GEORGIA

BAGHOUSE BUILDING - FIRE EXIT PLAN

PROJECT NUMBER	FAC. NO.	DEPT/AREA	DRAWING TYPE	DRAWING NUMBER	REV NO.
047-2	---	---	Fire	F.3.2	1

REGISTERED PROFESSIONAL ENGINEER No. C43686 Exp. 3/31/13 CIVIL STATE OF CALIFORNIA

APPENDIX D

MSDS LIST and OSHA HEALTH & SAFETY INFORMATION FOR LEAD

MSDS LIST

Material Safety Data Sheets are maintained onsite (bound under a separate cover) for the following chemicals:

Paint Thinner
High Temperature Paint
Inswool Blanket
Antimony
Arsenic
Battery expander
Calcium
Ferric Chloride
Hydrogen Peroxide, 35-40%
Red Heavy Duty Kleensweep
Absolyte IIP V-0 Valve Regulated Lead Acid Battery
Absolyte IIP, Champion, and Element Valve Regulated Lead Acid Battery
Lead-Acid Battery
Valve regulated lead acid absorbed glass mat blocs
Marathon V-0 and Sprinter V-0 Valve Regulated Lead Acid Battery
Marathon and Sprinter Valve Regulated Lead Acid Battery
Lead Oxide
Red Lead Oxide
Narmag 60DB
Nucon 60
Potassium Nitrate
Rescal 70D
Selenium
Sodium Carbonate
Sodium Hydroxide
Sodium Sulfate
Tin
West C-124
West W-126

OSHA Regulations

Substance Data Sheet for Occupational Exposure to Lead

Standard Number:	29 CFR 1910.1025 Appendix A Cal/OSHA 5216 Appendix A
Standard Title:	Substance data sheet for occupational exposure to lead
SubPart Number:	Z
SubPart Title:	Toxic and Hazardous Substances

I. SUBSTANCE IDENTIFICATION

A. Substance:

Pure lead (Pb) is a heavy metal at room temperature and pressure and is a basic chemical element. It can combine with various other substances to form numerous lead compounds.

B. Compounds Covered by the Standard:

The word "lead" when used in this standard means elemental lead, all inorganic lead compounds and a class of organic lead compounds called lead soaps. This standard does not apply to other organic lead compounds.

C. Uses:

Exposure to lead occurs in at least 120 different occupations, including primary and secondary lead smelting, lead storage battery manufacturing, lead pigment manufacturing and use, solder manufacturing and use, shipbuilding and ship repairing, auto manufacturing, and printing.

D. Permissible Exposure:

The Permissible Exposure Limit (PEL) set by the standard is 50 micrograms of lead per cubic meter of air (50 ug/m(3)), averaged over an 8-hour workday.

E. Action Level:

The standard establishes an action level of 30 micrograms per cubic meter of air (30 ug/m(3)), time weighted average, based on an 8-hour work-day. The action level initiates several requirements of the standard, such as exposure monitoring, medical surveillance, and training and education.

II. HEALTH HAZARD DATA

A. Ways in which lead enters your body.

When absorbed into your body in certain doses lead is a toxic substance. The object of the lead standard is to prevent absorption of harmful quantities of lead. The standard is intended to protect you not only from the immediate toxic effects of lead, but also from

the serious toxic effects that may not become apparent until years of exposure have passed.

Lead can be absorbed into your body by inhalation (breathing) and ingestion (eating). Lead (except for certain organic lead compounds not covered by the standard, such as tetraethyl lead) is not absorbed through your skin. When lead is scattered in the air as a dust, fume or mist it can be inhaled and absorbed through you lungs and upper respiratory tract. Inhalation of airborne lead is generally the most important source of occupational lead absorption. You can also absorb lead through your digestive system if lead gets into your mouth and is swallowed. If you handle food, cigarettes, chewing tobacco, or make-up which have lead on them or handle them with hands contaminated with lead, this will contribute to ingestion.

A significant portion of the lead that you inhale or ingest gets into your blood stream. Once in your blood stream, lead is circulated throughout your body and stored in various organs and body tissues. Some of this lead is quickly filtered out of your body and excreted, but some remains in the blood and other tissues. As exposure to lead continues, the amount stored in your body will increase if you are absorbing more lead than your body is excreting. Even though you may not be aware of any immediate symptoms of disease, this lead stored in your tissues can be slowly causing irreversible damage, first to individual cells, then to your organs and whole body systems.

B. Effects of overexposure to lead

(1) Short term (acute) overexposure.

Lead is a potent, systemic poison that serves no known useful function once absorbed by your body. Taken in large enough doses, lead can kill you in a matter of days. A condition affecting the brain called acute encephalopathy may arise which develops quickly to seizures, coma, and death from cardiorespiratory arrest. A short term dose of lead can lead to acute encephalopathy. Short term occupational exposures of this magnitude are highly unusual, but not impossible. Similar forms of encephalopathy may, however, arise from extended, chronic exposure to lower doses of lead. There is no sharp dividing line between rapidly developing acute effects of lead, and chronic effects which take longer to acquire. Lead adversely affects numerous body systems, and causes forms of health impairment and disease which arise after periods of exposure as short as days or as long as several years.

(2) Long-term (chronic) overexposure.

Chronic overexposure to lead may result in severe damage to your blood-forming, nervous, urinary and reproductive systems. Some common symptoms of chronic overexposure include loss of appetite, metallic taste in the mouth, anxiety, constipation, nausea, pallor, excessive tiredness, weakness, insomnia, headache, nervous irritability, muscle and joint pain or soreness, fine tremors, numbness, dizziness, hyperactivity and colic. In lead colic there may be severe abdominal pain.

Damage to the central nervous system in general and the brain (encephalopathy) in particular is one of the most severe forms of lead poisoning. The most severe, often fatal, form of encephalopathy may be preceded by vomiting, a feeling of dullness progressing to drowsiness and stupor, poor memory, restlessness, irritability, tremor, and convulsions. It may arise suddenly with the onset of seizures, followed by coma, and death. There is a tendency for muscular weakness to develop at the same time. This weakness may progress to paralysis often observed as a characteristic "wrist drop" or "foot drop" and is a manifestation of a disease to the nervous system called peripheral neuropathy.

Chronic overexposure to lead also results in kidney disease with few, if any, symptoms appearing until extensive and most likely permanent kidney damage has occurred. Routine laboratory tests reveal the presence of this kidney disease only after about two-thirds of kidney function is lost. When overt symptoms of urinary dysfunction arise, it is often too late to correct or prevent worsening conditions, and progression to kidney dialysis or death is possible.

Chronic overexposure to lead impairs the reproductive systems of both men and women. Overexposure to lead may result in decreased sex drive, impotence and sterility in men. Lead can alter the structure of sperm cells raising the risk of birth defects. There is evidence of miscarriage and stillbirth in women whose husbands were exposed to lead or who were exposed to lead themselves. Lead exposure also may result in decreased fertility, and abnormal menstrual cycles in women. The course of pregnancy may be adversely affected by exposure to lead since lead crosses the placental barrier and poses risks to developing fetuses. Children born of parents either one of whom were exposed to excess lead levels are more likely to have birth defects, mental retardation, behavioral disorders or die during the first year of childhood.

Overexposure to lead also disrupts the blood-forming system resulting in decreased hemoglobin (the substance in the blood that carries oxygen to the cells) and ultimately anemia. Anemia is characterized by weakness, pallor and fatigability as a result of decreased oxygen carrying capacity in the blood.

(3) Health protection goals of the standard.

Prevention of adverse health effects for most workers from exposure to lead throughout a working lifetime requires that worker blood lead (PbB) levels be maintained at or below forty micrograms per one hundred grams of whole blood (40 ug/100g). The blood lead levels of workers (both male and female workers) who intend to have children should be maintained below 30 ug/100g to minimize adverse reproductive health effects to the parents and to the developing fetus.

The measurement of your blood lead level is the most useful indicator of the amount of lead being absorbed by your body. Blood lead levels (PbB) are most often reported in units of milligrams (mg) or micrograms (ug) of lead (1 mg=1000 ug) per 100 grams (100g), 100 milliliters (100 ml) or deciliter (dl) of blood. These three units are

essentially the same. Sometimes PbB's are expressed in the form of mg% or ug%. This is a shorthand notation for mg Pb or ug Pb per 100g, 100 ml, or dl.

PbB measurements show the amount of lead circulating in your blood stream, but do not give any information about the amount of lead stored in your various tissues. PbB measurements merely show current absorption of lead, not the effect that lead is having on your body or the effects that past lead exposure may have already caused. Past research into lead-related diseases, however, has focused heavily on associations between PbBs and various diseases. As a result, your PbB is an important indicator of the likelihood that you will gradually acquire a lead-related health impairment or disease.

Once your blood lead level climbs above 40 ug/100g, your risk of disease increases. There is a wide variability of individual response to lead, thus it is difficult to say that a particular PbB in a given person will cause a particular effect. Studies have associated fatal encephalopathy with PbBs as low as 150 ug/100g. Other studies have shown other forms of diseases in some workers with PbBs well below 80 ug/100g. Your PbB is a crucial indicator of the risks to your health, but one other factor is also extremely important. This factor is the length of time you have had elevated PbBs. The longer you have an elevated PbB, the greater the risk that large quantities of lead are being gradually stored in your organs and tissues (body burden). The greater your overall body burden, the greater the chances of substantial permanent damage.

The best way to prevent all forms of lead-related impairments and diseases-both short term and long term- is to maintain your PbB below 40 ug/100g. The provisions of the standard are designed with this end in mind. Your employer has prime responsibility to assure that the provisions of the standard are complied with both by the company and by individual workers. You as a worker, however, also have a responsibility to assist your employer in complying with the standard. You can play a key role in protecting your own health by learning about the lead hazards and their control, learning what the standard requires, following the standard where it governs your own actions, and seeing that your employer complies with provisions governing his actions.

(4) Reporting signs and symptoms of health problems.

You should immediately notify your employer if you develop signs or symptoms associated with lead poisoning or if you desire medical advice concerning the effects of current or past exposure to lead on your ability to have a healthy child. You should also notify your employer if you have difficulty breathing during a respirator fit test or while wearing a respirator. In each of these cases your employer must make available to you appropriate medical examinations or consultations. These must be provided at no cost to you and at a reasonable time and place.

The standard contains a procedure whereby you can obtain a second opinion by a physician of your choice if the employer selected the initial physician.

OSHA Regulations

Lead Standards Summary for Employees

Standard Number:	1910.1025 Appendix B; Cal/OSHA Section 5216
Standard Title:	Employee standard summary
SubPart Number:	Z
SubPart Title:	Toxic and Hazardous Substances

This appendix summarizes key provisions of the standard that you as a worker should become familiar with.

I. PERMISSIBLE EXPOSURE LIMIT (PEL) - PARAGRAPH (C)

The standards sets a permissible exposure limit (PEL) of fifty micrograms of lead per cubic meter of air (50 ug/m(3)), averaged over an 8-hour work-day. This is the highest level of lead in air to which you may be permissibly exposed over an 8-hour workday. Since it is an 8-hour average it permits short exposures above the PEL so long as for each 8-hour work day your average exposure does not exceed the PEL.

This standard recognizes that your daily exposure to lead can extend beyond a typical 8-hour workday as the result of overtime or other alterations in your work schedule. To deal with this, the standard contains a formula which reduces your permissible exposure when you are exposed more than 8 hours. For example, if you are exposed to lead for 10 hours a day, the maximum permitted average exposure would be 40 ug/m(3).

II. EXPOSURE MONITORING - PARAGRAPH (D)

If lead is present in the workplace where you work in any quantity, your employer is required to make an initial determination of whether the action level is exceeded for any employee. This initial determination must include instrument monitoring of the air for the presence of lead and must cover the exposure of a representative number of employees who are reasonably believed to have the highest exposure levels. If your employer has conducted appropriate air sampling for lead in the past year he may use these results. If there have been any employee complaints of symptoms which may be attributable to exposure to lead or if there is any other information or observations which would indicate employee exposure to lead, this must also be considered as part of the initial determination. This initial determination must have been completed by March 31, 1979. If this initial determination shows that a reasonable possibility exists that any employee may be exposed, without regard to respirators, over the action level (30 ug/m(3)) your employer must set up an air monitoring program to determine the exposure level of every employee exposed to lead at your workplace.

In carrying out this air monitoring program, your employer is not required to monitor the exposure of every employee, but he must monitor a representative number of employees and job types. Enough sampling must be done to enable each employee's exposure level to be reasonably represented by at least one full shift (at least 7 hours) air sample. In addition, these air samples must be taken under conditions which represent each employee's regular, daily exposure to lead. All initial exposure monitoring must have been completed by May 30, 1979.

If you are exposed to lead and air sampling is performed, your employer is required to quickly notify you in writing of air monitoring results which represent your exposure. If the results indicate your exposure exceeds the PEL (without regard to your use of respirators), then your employer must also notify you of this in writing, and provide you with a description of the corrective action that will be taken to reduce your exposure.

Your exposure must be rechecked by monitoring every six months if your exposure is over the action level but below the PEL. Air monitoring must be repeated every 3 months if you are exposed over the PEL. Your employer may discontinue monitoring for you if 2 consecutive measurements, taken at least two weeks apart, are below the action level. However, whenever there is a production, process, control, or personnel change at your workplace which may result in new or additional exposure to lead, or whenever there is any other reason to suspect a change which may result in new or additional exposure to lead, your employer must perform additional monitoring.

III. METHODS OF COMPLIANCE - PARAGRAPH (E)

Your employer is required to assure that no employee is exposed to lead in excess of the PEL. The standard establishes a priority of methods to be used to meet the PEL.

IV. RESPIRATORY PROTECTION - PARAGRAPH (F)

Your employer is required to provide and assure your use of respirators when your exposure to lead is not controlled below the PEL by other means. The employer must pay the cost of the respirator. Whenever you request one, your employer is also required to provide you a respirator even if your air exposure level does not exceed the PEL. You might desire a respirator when, for example, you have received medical advice that your lead absorption should be decreased. Or, you may intend to have children in the near future, and want to reduce the level of lead in your body to minimize adverse reproductive effects. While respirators are the least satisfactory means of controlling your exposure, they are capable of providing significant protection if properly chosen, fitted, worn, cleaned, maintained, and replaced when they stop providing adequate protection.

Your employer is required to select respirators from the seven types listed in Table II of the Respiratory Protection section of the standard (Sec. 1910.1025(f)). Any respirator chosen must be approved by the National Institute for Occupational Safety and Health (NIOSH) under the provisions of 42 CFR part 84. This respirator selection table will enable your employer to choose a type of respirator that will give you a proper amount of protection based on your airborne lead exposure. Your employer may select a type of respirator that provides greater protection than that required by the standard; that is, one recommended for a higher concentration of lead than is present in your workplace. For example, a powered air-purifying respirator (PAPR) is much more protective than a typical negative pressure respirator, and may also be more comfortable to wear. A PAPR has a filter, cartridge, or canister to clean the air, and a power source that continuously blows filtered air into your breathing zone. Your employer might make a PAPR available to you to ease the burden of having to wear a respirator for long periods of time. The standard provides that you can obtain a PAPR upon request.

Your employer must also start a Respiratory Protection Program. This program must include written procedures for the proper selection, use, cleaning, storage, and maintenance of respirators.

Your employer must ensure that your respirator facepiece fits properly. Proper fit of a respirator facepiece is critical to your protection from airborne lead. Obtaining a proper fit on each employee may require your employer to make available several different types of respirator masks. To ensure that your respirator fits properly and that facepiece leakage is minimal, your employer must give you either a qualitative or quantitative fit test as specified in Appendix A of the Respiratory Protection standard located at 29 CFR 1910.134.

You must also receive from your employer proper training in the use of respirators. Your employer is required to teach you how to wear a respirator, to know why it is needed, and to understand its limitations.

The standard provides that if your respirator uses filter elements, you must be given an opportunity to change the filter elements whenever an increase in breathing resistance is detected. You also must be permitted to periodically leave your work area to wash your face and respirator facepiece whenever necessary to prevent skin irritation. If you ever have difficulty in breathing during a fit test or while using a respirator, your employer must make a medical examination available to you to determine whether you can safely wear a respirator. The result of this examination may be to give you a positive pressure respirator (which reduces breathing resistance) or to provide alternative means of protection.

V. PROTECTIVE WORK CLOTHING AND EQUIPMENT - PARAGRAPH (G)

If you are exposed to lead above the PEL, or if you are exposed to lead compounds such as lead arsenate or lead azide which can cause skin and eye irritation, your employer must provide you with protective work clothing and equipment appropriate for the hazard. If work clothing is provided, it must be provided in a clean and dry condition at least weekly, and daily if your airborne exposure to lead is greater than 200 ug/m(3). Appropriate protective work clothing and equipment can include coveralls or similar full-body work clothing, gloves, hats, shoes or disposable shoe coverlets, and face shields or vented goggles. Your employer is required to provide all such equipment at no cost to you. He is responsible for providing repairs and replacement as necessary, and also is responsible for the cleaning, laundering or disposal of protective clothing and equipment. Contaminated work clothing or equipment must be removed in change rooms and not worn home or you will extend your exposure and expose your family since lead from your clothing can accumulate in your house, car, etc. Contaminated clothing which is to be cleaned, laundered or disposed of must be placed in closed containers in the change room. At no time may lead be removed from protective clothing or equipment by any means which disperses lead into the workroom air.

VI. HOUSEKEEPING - PARAGRAPH (H)

Your employer must establish a housekeeping program sufficient to maintain all surfaces as free as practicable of accumulations of lead dust. Vacuuming is the preferred method of meeting this requirement, and the use of compressed air to clean floors and other surfaces is absolutely prohibited. Dry or wet sweeping, shoveling, or brushing may not be used except where vacuuming

or other equally effective methods have been tried and do not work. Vacuums must be used and emptied in a manner which minimizes the reentry of lead into the workplace.

VII. HYGIENE FACILITIES AND PRACTICES - PARAGRAPH (I)

The standard requires that change rooms, showers, and filtered air lunchrooms be constructed and made available to workers exposed to lead above the PEL. These requirements have temporarily been delayed by the court of appeals in situations where new facilities must be constructed, or where substantial renovations must be made to existing facilities. When the PEL is exceeded, the employer must assure that food and beverage is not present or consumed, tobacco products are not present or used, and cosmetics are not applied, except in these facilities. Change rooms, showers, and lunchrooms, must be used by workers exposed in excess of the PEL. After showering, no clothing or equipment worn during the shift may be worn home, and this includes shoes and underwear. Your own clothing worn during the shift should be carried home and cleaned carefully so that it does not contaminate your home. Lunchrooms may not be entered with protective clothing or equipment unless surface dust has been removed by vacuuming, downdraft booth, or other cleaning method. Finally, workers exposed above the PEL must wash both their hands and faces prior to eating, drinking, smoking or applying cosmetics.

All of the facilities and hygiene practices just discussed are essential to minimize additional sources of lead absorption from inhalation or ingestion of lead that may accumulate on you, your clothes, or your possessions. Strict compliance with these provisions can virtually eliminate several sources of lead exposure which significantly contribute to excessive lead absorption.

VIII. MEDICAL SURVEILLANCE - PARAGRAPH (J)

The medical surveillance program is part of the standard's comprehensive approach to the prevention of lead-related disease. Its purpose is to supplement the main thrust of the standard which is aimed at minimizing airborne concentrations of lead and sources of ingestion. Only medical surveillance can determine if the other provisions of the standard have affectively protected you as an individual. Compliance with the standard's provision will protect most workers from the adverse effects of lead exposure, but may not be satisfactory to protect individual workers (1) who have high body burdens of lead acquired over past years, (2) who have additional uncontrolled sources of non-occupational lead exposure, (3) who exhibit unusual variations in lead absorption rates, or (4) who have specific non-work related medical conditions which could be aggravated by lead exposure (e.g., renal disease, anemia). In addition, control systems may fail, or hygiene and respirator programs may be inadequate. Periodic medical surveillance of individual workers will help detect those failures. Medical surveillance will also be important to protect your reproductive ability-regardless of whether you are a man or woman.

All medical surveillance required by the standard must be performed by or under the supervision of a licensed physician. The employer must provide required medical surveillance without cost to employees and at a reasonable time and place. The standard's medical surveillance program has two parts-periodic biological monitoring and medical examinations.

Your employer's obligation to offer you medical surveillance is triggered by the results of the air monitoring program. Medical surveillance must be made available to all employees who are

exposed in excess of the action level for more than 30 days a year. The initial phase of the medical surveillance program, which includes blood lead level tests and medical examinations, must be completed for all covered employees no later than August 28, 1979. Priority within this first round of medical surveillance must be given to employees whom the employer believes to be at greatest risk from continued exposure (for example, those with the longest prior exposure to lead, or those with the highest current exposure). Thereafter, the employer must periodically make medical surveillance-both biological monitoring and medical examinations-available to all covered employees.

Biological monitoring under the standard consists of blood lead level (PbB) and zinc protoporphyrin tests at least every 6 months after the initial PbB test. A zinc protoporphyrin (ZPP) test is a very useful blood test which measures an effect of lead on your body. Thus biological monitoring under the standard is currently limited to PbB testing. If a worker's PbB exceeds 40 ug/100g the monitoring frequency must be increased from every 6 months to at least every 2 months and not reduced until two consecutive PbBs indicate a blood lead level below 40 ug/100g. Each time your PbB is determined to be over 40 ug/100g, your employer must notify you of this in writing within five working days of his receipt of the test results. The employer must also inform you that the standard requires temporary medical removal with economic protection when your PbB exceeds certain criteria. (See Discussion of Medical Removal Protection-Paragraph (k).) During the first year of the standard, this removal criterion is 80 ug/100g. Anytime your PbB exceeds 80 ug/100g your employer must make available to you a prompt follow-up PbB test to ascertain your PbB. If the two tests both exceed 80 ug/100g and you are temporarily removed, then your employer must make successive PbB tests available to you on a monthly basis during the period of your removal.

Medical examinations beyond the initial one must be made available on an annual basis if your blood lead level exceeds 40 ug/100g at any time during the preceding year. The initial examination will provide information to establish a baseline to which subsequent data can be compared. An initial medical examination must also be made available (prior to assignment) for each employee being assigned for the first time to an area where the airborne concentration of lead equals or exceeds the action level. In addition, a medical examination or consultation must be made available as soon as possible if you notify your employer that you are experiencing signs or symptoms commonly associated with lead poisoning or that you have difficulty breathing while wearing a respirator or during a respirator fit test. You must also be provided a medical examination or consultation if you notify your employer that you desire medical advice concerning the effects of current or past exposure to lead on your ability to procreate a healthy child.

Finally, appropriate follow-up medical examinations or consultations may also be provided for employees who have been temporarily removed from exposure under the medical removal protection provisions of the standard. (See Part IX, below.)

The standard specifies the minimum content of pre-assignment and annual medical examinations. The content of other types of medical examinations and consultations is left up to the sound discretion of the examining physician. Pre-assignment and annual medical examinations must include (1) a detailed work history and medical history, (2) a thorough physical examination, and (3) a series of laboratory tests designed to check your blood chemistry and your kidney function. In addition, at any time upon your request, a laboratory evaluation of male fertility will be made (microscopic examination of a sperm sample), or a pregnancy test will be given.

The standard does not require that you participate in any of the medical procedures, tests, etc. which your employer is required to make available to you. Medical surveillance can, however, play a very important role in protecting your health. You are strongly encouraged, therefore, to participate in a meaningful fashion. The standard contains a multiple physician review mechanism which would give you a chance to have a physician of your choice directly participate in the medical surveillance program. If you were dissatisfied with an examination by a physician chosen by your employer, you could select a second physician to conduct an independent analysis. The two doctors would attempt to resolve any differences of opinion, and select a third physician to resolve any firm dispute. Generally your employer will choose the physician who conducts medical surveillance under the lead standard-unless you and your employer can agree on the choice of a physician or physicians. Some companies and unions have agreed in advance, for example, to use certain independent medical laboratories or panels of physicians. Any of these arrangements are acceptable so long as required medical surveillance is made available to workers.

The standard requires your employer to provide certain information to a physician to aid in his or her examination of you. This information includes (1) the standard and its appendices, (2) a description of your duties as they relate to lead exposure, (3) your exposure level, (4) a description of personal protective equipment you wear, (5) prior blood lead level results, and (6) prior written medical opinions concerning you that the employer has. After a medical examination or consultation the physician must prepare a written report which must contain (1) the physician's opinion as to whether you have any medical condition which places you at increased risk of material impairment to health from exposure to lead, (2) any recommended special protective measures to be provided to you, (3) any blood lead level determinations, and (4) any recommended limitation on your use of respirators. This last element must include a determination of whether you can wear a powered air purifying respirator (PAPR) if you are found unable to wear a negative pressure respirator.

The medical surveillance program of the lead standard may at some point in time serve to notify certain workers that they have acquired a disease or other adverse medical condition as a result of occupational lead exposure. If this is true, these workers might have legal rights to compensation from public agencies, their employers, firms that supply hazardous products to their employers, or other persons. Some states have laws, including worker compensation laws, that disallow a worker who learns of a job-related health impairment to sue, unless the worker sues within a short period of time after learning of the impairment. (This period of time may be a matter of months or years.) An attorney can be consulted about these possibilities. It should be stressed that OSHA is in no way trying to either encourage or discourage claims or lawsuits. However, since results of the standard's medical surveillance program can significantly affect the legal remedies of a worker who has acquired a job-related disease or impairment, it is proper for OSHA to make you aware of this.

The medical surveillance section of the standard also contains provisions dealing with chelation. Chelation is the use of certain drugs (administered in pill form or injected into the body) to reduce the amount of lead absorbed in body tissues. Experience accumulated by the medical and scientific communities has largely confirmed the effectiveness of this type of therapy for the treatment of very severe lead poisoning. On the other hand, it has also been established that there can be a long list of extremely harmful side effects associated with the use of chelating agents. The medical community has balanced the advantages and disadvantages resulting from the use of chelating agents in various circumstances and has established when the use of these agents is acceptable. The standard includes these accepted limitations due to a history of abuse of chelation therapy by some

lead companies. The most widely used chelating agents are calcium disodium EDTA, (Ca Na2 EDTA), Calcium Disodium Versenate (Versenate), and d-penicillamine (pencillamine or Cupramine).

The standard prohibits "prophylactic chelation" of any employee by any person the employer retains, supervises or controls. "Prophylactic chelation" is the routine use of chelating or similarly acting drugs to prevent elevated blood levels in workers who are occupationally exposed to lead, or the use of these drugs to routinely lower blood lead levels to predesignated concentrations believed to be `safe'. It should be emphasized that where an employer takes a worker who has no symptoms of lead poisoning and has chelation carried out by a physician (either inside or outside of a hospital) solely to reduce the worker's blood lead level, that will generally be considered prophylactic chelation. The use of a hospital and a physician does not mean that prophylactic chelation is not being performed. Routine chelation to prevent increased or reduce current blood lead levels is unacceptable whatever the setting.

The standard allows the use of "therapeutic" or "diagnostic" chelation if administered under the supervision of a licensed physician in a clinical setting with thorough and appropriate medical monitoring. Therapeutic chelation responds to severe lead poisoning where there are marked symptoms. Diagnostic chelation involved giving a patient a dose of the drug then collecting all urine excreted for some period of time as an aid to the diagnosis of lead poisoning.

In cases where the examining physician determines that chelation is appropriate, you must be notified in writing of this fact before such treatment. This will inform you of a potentially harmful treatment, and allow you to obtain a second opinion.

IX. MEDICAL REMOVAL PROTECTION - PARAGRAPH (K)

Excessive lead absorption subjects you to increased risk of disease. Medical removal protection (MRP) is a means of protecting you when, for whatever reasons, other methods, such as engineering controls, work practices, and respirators, have failed to provide the protection you need. MRP involves the temporary removal of a worker from his or her regular job to a place of significantly lower exposure without any loss of earnings, seniority, or other employment rights or benefits. The purpose of this program is to cease further lead absorption and allow your body to naturally excrete lead which has previously been absorbed. Temporary medical removal can result from an elevated blood lead level, or a medical opinion. Up to 18 months of protection is provided as a result of either form of removal. The vast majority of removed workers, however, will return to their former jobs long before this eighteen month period expires. The standard contains special provisions to deal with the extraordinary but possible case where a longterm worker's blood lead level does not adequately decline during eighteen months of removal.

During the first year of the standard, if your blood lead level is 80 ug/100g or above you must be removed from any exposure where your air lead level without a respirator would be 100 ug/m(3) or above. If you are removed from your normal job you may not be returned until your blood lead level declines to at least 60 ug/100g. These criteria for removal and return will change according to the following schedule:

	Removal blood lead (ug/100 g)	Air lead (ug/m(3))	Return blood lead (ug/100 g)
After Mar. 1, 1980..	70 and above....	50 and above.	At or below 50.
After Mar. 1, 1981..	60 and above....	30 and above.	At or below 40.
After Mar. 1, 1983..	50 and above averaged over six months.....	30 and above.	Do.

You may also be removed from exposure even if your blood lead levels are below these criteria if a final medical determination indicates that you temporarily need reduced lead exposure for medical reasons. If the physician who is implementing your employers medical program makes a final written opinion recommending your removal or other special protective measures, your employer must implement the physician's recommendation. If you are removed in this manner, you may only be returned when the doctor indicates that it is safe for you to do so.

The standard does not give specific instructions dealing with what an employer must do with a removed worker. Your job assignment upon removal is a matter for you, your employer and your union (if any) to work out consistent with existing procedures for job assignments. Each removal must be accomplished in a manner consistent with existing collective bargaining relationships. Your employer is given broad discretion to implement temporary removals so long as no attempt is made to override existing agreements. Similarly, a removed worker is provided no right to veto an employer's choice which satisfies the standard.

In most cases, employers will likely transfer removed employees to other jobs with sufficiently low lead exposure. Alternatively, a worker's hours may be reduced so that the time weighted average exposure is reduced, or he or she may be temporarily laid off if no other alternative is feasible.

In all of these situation, MRP benefits must be provided during the period of removal - i.e., you continue to receive the same earnings, seniority, and other rights and benefits you would have had if you had not been removed. Earnings includes more than just your base wage; it includes overtime, shift differentials, incentives, and other compensation you would have earned if you had not been removed. During the period of removal you must also be provided with appropriate follow-up medical surveillance. If you were removed because your blood lead level was too high, you must be provided with a monthly blood test. If a medical opinion caused your removal, you must be provided medical tests or examinations that the doctor believes to be appropriate. If you do not participate in this follow up medical surveillance, you may lose your eligibility for MRP benefits.

When you are medically eligible to return to your former job, your employer must return you to your "former job status." This means that you are entitled to the position, wages, benefits, etc., you would have had if you had not been removed. If you would still be in your old job if no removal had occurred that is where you go back. If not, you are returned consistent with whatever

job assignment discretion your employer would have had if no removal had occurred. MRP only seeks to maintain your rights, not expand them or diminish them.

If you are removed under MRP and you are also eligible for worker compensation or other compensation for lost wages, your employer's MRP benefits obligation is reduced by the amount that you actually receive from these other sources. This is also true if you obtain other employment during the time you are laid off with MRP benefits.

The standard also covers situations where an employer voluntarily removes a worker from exposure to lead due to the effects of lead on the employee's medical condition, even though the standard does not require removal. In these situations MRP benefits must still be provided as though the standard required removal. Finally, it is important to note that in all cases where removal is required, respirators cannot be used as a substitute. Respirators may be used before removal becomes necessary, but not as an alternative to a transfer to a low exposure job, or to a lay-off with MRP benefits.

X. EMPLOYEE INFORMATION AND TRAINING - PARAGRAPH (L)

Your employer is required to provide an information and training program for all employees exposed to lead above the action level or who may suffer skin or eye irritation from lead. This program must inform these employees of the specific hazards associated with their work environment, protective measures which can be taken, the danger of lead to their bodies (including their reproductive systems), and their rights under the standard. In addition your employer must make readily available to all employees, including those exposed below the action level, a copy of the standard and its appendices and must distribute to all employees any materials provided to the employer by the Occupational Safety and Health Administration (OSHA).

Your employer is required to complete this training program for all employees by August 28, 1979. After this date, all new employees must be trained prior to initial assignment to areas where there is a possibility of exposure over the action level.

This training program must also be provided at least annually thereafter.

XI. SIGNS - PARAGRAPH (M)

The standard requires that the following warning sign be posted in work areas where the exposure to lead exceeds the PEL:

WARNING
LEAD WORK AREA
NO SMOKING OR EATING

XII. RECORDKEEPING - PARAGRAPH (N)

Your employer is required to keep all records of exposure monitoring for airborne lead. These records must include the name and job classification of employees measured, details of the sampling and analytic techniques, the results of this sampling, and the type of respiratory protection being worn by the person sampled. Your employer is also required to keep all records of biological monitoring and medical examination results. These must include the names of the employees, the physician's written opinion, and a copy of the results of the examination. All of the above kinds of records must be kept for 40 years, or for at least 20 years after your termination of employment, whichever is longer.

Recordkeeping is also required if you are temporarily removed from your job under the medical removal protection program. This record must include your name and social security number, the date of your removal and return, how the removal was or is being accomplished, and whether or not the reason for the removal was an elevated blood lead level. Your employer is required to keep each medical removal record only for as long as the duration of an employee's employment.

The standard requires that if you request to see or copy environmental monitoring, blood lead level monitoring, or medical removal records, they must be made available to you or to a representative that you authorize. Your union also has access to these records. Medical records other than PbB's must also be provided upon request to you, to your physician or to any other person whom you may specifically designate. Your union does not have access to your personal medical records unless you authorize their access.

XIII. OBSERVATIONS OF MONITORING - PARAGRAPH (O)

When air monitoring for lead is performed at your workplace as required by this standard, your employer must allow you or someone you designate to act as an observer of the monitoring. Observers are entitled to an explanation of the measurement procedure, and to record the results obtained. Since results will not normally be available at the time of the monitoring, observers are entitled to record or receive the results of the monitoring when returned by the laboratory. Your employer is required to provide the observer with any personal protective devices required to be worn by employees working in the area that is being monitored. The employer must require the observer to wear all such equipment and to comply with all other applicable safety and health procedures.

XIV. EFFECTIVE DATE - PARAGRAPH (P)

The standard's effective data is March 1, 1979, and employer obligations under the standard begin to come into effect as of that date.

XV. FOR ADDITIONAL INFORMATION

A. Copies of the Standard and explanatory material may be obtained by writing or calling the OSHA Docket Office, U.S. Department of Labor, room N2634, 200 Constitution Avenue, N.W., Washington DC 20210. Telephone: (202) 219-7894.

1. The standard and summary of the statement of reasons (preamble), Federal Register, Volume 43, pp. 52952-53014, November 14, 1978.
2. The full statement of reasons (preamble) Federal Register, vol. 43, pp. 54354-54509, November 21, 1978.
3. Partial Administrative Stay and Corrections to the standard, (44 FR 5446-5448) January 26, 1979.
4. Notice of the Partial Judicial Stay (44 FR 14554-14555) March 13, 1979.
5. Corrections to the preamble, Federal Register, vol. 44, pp. 20680-20681, April 6, 1979.
6. Additional correction to the preamble concerning the construction industry, Federal Register, vol. 44, p. 50338, August 28, 1979.
7. Appendices to the standard (Appendices A, B, C), Federal Register, Vol. 44, pp. 60980-60995, October 23, 1979.
8. Corrections to appendices, Federal Register, Vol. 44, 68828, November 30, 1979.
9. Revision to the standard and an additional appendix (Appendix D), Federal Register, Vol. 47, pp. 51117-51119, November 12, 1982.
10. Notice of reopening of lead rulemaking for nine remand industry sectors, Federal Register, vol. 53, pp. 11511-11513, April 7, 1988.
11. Statement of reasons, Federal Register, vol. 54, pp. 29142-29275, July 11, 1989.
12. Statement of reasons, Federal Register, vol. 55, pp. 3146-3167, January 30, 1990.
13. Correction to appendix B, Federal Register, vol. 55, pp. 4998-4999, February 13, 1991.
14. Correction to appendices, Federal Register, vol. 56, p. 24686, May 31, 1991.
15. California Codes of Regulation, Title 8, Section 5216: Lead Standard (CCR 8 §5216).

B. Additional information about the standard, its enforcement, and your employer's compliance can be obtained from the nearest OSHA Area Office listed in your telephone directory under United States Government/Department of Labor.

APPENDIX E
ADMINISTRATION FORMS

EXIDE TECHNOLOGIES
RESOURCE RECYCLING DIVISION
VERNON, CALIFORNIA

SPILL NOTIFICATION FORM

1) Date of Spill: _____ Time of Spill: _____ AM / PM

2) Material or Product Name: _____

3) Amount of Product Spilled: _____ Gallons

4) Location of Spill: _____

5) Was Spill contained inside the Plant: ☐ YES ☐ NO

6) Was Spill released to: ☐ Soil ☐ Surface Water ☐ Air
☐ Sanitary Sewer ☐ Groundwater
☐ Spill was not released to the Environment

7) Describe how spill was contained:

8) Describe how spill occurred:

9) Describe Clean-up procedures and where waste is located:

10) Describe how this and similar spills can be prevented in the future:

TELEPHONE NOTIFICATION FORM FOR RELEASES AND THREATENED RELEASES

Call the following agencies and provide the information indicated below to the extent it is known. (Do not delay notification in order to collect this information.)

National Response Center:	**1-800-424-8802**
Local Emergency Response Administering Agency:	**(323) 583-4821**
California State Warning Center:	**1-800-852-7550**
City of Vernon Department of Environmental Health:	**(323) 583-8811**

1. Name and phone number of the person making the report (notification):

2. Name and address of the facility:

   Exide Technologies
   Resource Recycling Division
   2700 South Indiana Avenue
   Vernon, California 90058
   (323) 262-1101

3. Type of incident (e.g., spill, fire, explosion):

4. Time, location, and duration of incident/release:

5. Names and quantities of any chemicals or substances released (to the extent known):

6. Identify any released materials that are listed as extremely hazardous substances in Appendix A of 40 CFR 355.

7. List media affected by the release (e.g., air, soil, water, offsite persons):

8. Identify any known or anticipated acute or chronic health problems and any advice regarding medical attention that may be necessary for exposed individuals:

9. Necessary actions to be taken as a result of the release (e.g., area evacuations):

10. Extent of injuries, if any:

11. Possible hazards to human health or the environment outside the facility:

CONTINGENCY PLAN IMPLEMENTATION REPORT

TO

THE CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
Department of Toxic Substances Control Reg. 3
9211 Oakdale Avenue
Chatsworth, California 91311

(To be submitted within 15 days of any incident requiring implementation of this Plan.)

Exide Technologies
Resource Recycling Division
2700 South Indiana Avenue
Vernon, California 90058
(323) 262-1101

12. Name and telephone number of individual making report:

13. Name and address of plant (see above).

14. Attach a copy of the Telephone Notification Report.

15. Estimated quantity and disposition of recovered material that resulted from the incident:

16. Cause of occurrence:

17. Period of occurrence, including exact dates and times:

18. Time occurrence expected to continue (if not already corrected):

19. Steps taken or planned to reduce, eliminate, and prevent recurrence:

California Emergency Release Follow-up Notice Reporting Form and Instruction Sheet

The following form is to be submitted to the California Chemical Emergency Planning and Response Commission (CEPRC) within 30 days of any release of a substance in excess of its reportable quantity which impacted soil or any offsite receptor (air, water, sewer, soil, or person).

APPENDIX F

ARRANGEMENTS WITH LOCAL AUTHORITIES

<< EXAMPLE LETTER >>

<< TO BE TRANSFERRED TO EXIDE TECHNOLOGIES LETTERHEAD >>

Date

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Contact Name
Organization
Address
City, State ZIP

Dear *Contact*:

In order to comply with Federal and State regulations and to better prepare ourselves should an accident or other emergency occur at the Exide Technologies facility in Vernon, California, we would like to ensure that you are familiar with our facility and the hazards associated with the industrial activities in which we are engaged. Enclosed with this letter is a copy of our most recent Crisis Management Plan/Contingency Plan for your information and records.

Exide Technologies operates a lead-acid battery recycling facility (secondary lead smelter) located at 2700 South Indiana Avenue, Vernon, CA 90058. The lead reclamation process involves hazardous materials and hazardous wastes that are used and stored on site. At this location, Exide also operates an industrial wastewater treatment plant, which is classified as a hazardous waste treatment facility.

We have developed the enclosed Crisis Management Plan/Contingency Plan per federal and state regulations for hazardous material handling, preparedness, and prevention. We would welcome interaction with your department to familiarize you with our operations, and to discuss emergency protocols. We invite you to meet with us at our facility, or if you feel a site visit is unnecessary, a phone call to discuss these subjects would be appreciated.

Please feel free to call me at (323) 262-1101, extension 259 if you have any questions, to discuss the contingency plan and emergency procedures, or to set up a facility visit. Thank you for your assistance.

Yours truly,

Exide Technologies

Nicolas Serieys
Interim Environmental Manager

Enclosure

APPENDIX G
REVISIONS LOG

Crisis Management Plan / Contingency Plan
Revision Log

Exide Technologies Vernon, California

Revision No. 0: Date: _____

Authorized Signature: _____

Title: _____

Revision No. 7 : Date: 03/02/10

Revisions Made: Vianey Mendez

Authorized Signature: _____

Title: _____

Revision No. 8 : Date: 09/30/11

Revisions Made: Update emergency contacts (Advanced GeoServices)

Authorized Signature: _____

Title: _____

Revision No. 9 : Date: 4/16/2012

Revisions Made: Update emergency contacts, suppliers, and address (Exide collaborative)

Authorized Signature: Ed Mopas

Title: Environmental Manager

Revision No. 10 : Date: 1/15/2013

Revisions Made: Update emergency contacts

Authorized Signature: Ed Mopas

Title: Environmental Manager

Revision No. 11 : Date: 3/15/2013

Revisions Made: Update emergency contacts

Authorized Signature: Ed Mopas

Title: Environmental Manager

Revision No. 12 : Date: 8/4/14

Revisions Made: Update emergency contacts

Authorized Signature: Ed Mopas

Title: Environmental Manager

Revision No. 13 : Date: 2/27/15

Revisions Made: Update emergency contacts

Authorized Signature: Nicolas Serieys

Title: Interim Environmental Manager

Revision No. 14 : Date: 4/1/15

Revisions Made: Update emergency contacts and notification procedures

Authorized Signature: Nicolas Serieys

Title: Interim Environmental Manager