



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Edmund G. Brown Jr.
Governor

July 2, 2015

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

RESPONSE TO REQUEST FOR EXTENSION OF DEADLINE TO REMOVE FEED MATERIAL FROM THE BLAST FURNACE FEED ROOM, EXIDE TECHNOLOGIES, VERNON, CALIFORNIA; EPA ID. NO. CAD097854541

Dear Mr. Strang:

The Department of Toxic Substances Control (DTSC) has reviewed your letter dated June 26, 2015 (Letter), requesting extension of time to complete shipment of feed material out of the Blast Furnace Feed Room. The Letter describes unexpected complications with the destination facility, provides a history of materials shipped to date, includes rationale for the extension request and attempts to demonstrate that continued storage of the materials does not present a significant environmental risk.

DTSC is concerned that the feed material in the Blast Furnace Feed Room has not yet been completely removed. As stated in the letter dated May 13, 2015, DTSC has already determined that storage of this material is not appropriate and removal is necessary to protect human health and the environment. Storage of this material in the Containment Building is not an authorized activity and it must be removed immediately.

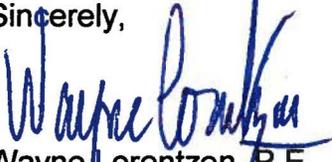
Exide shall submit for DTSC approval an amended work plan by July 8, 2015, that includes an alternate destination facility that is authorized to accept this material upon implementation of the work plan. The amended work plan shall include a map showing proposed transportation routes, an estimate of the number of trucks required on each route, authorization of the facility to accept the material and a loading and shipping schedule that facilitates immediate removal of the feed material in the Blast Furnace Feed Room. DTSC expects the material to be removed within two weeks of approval of the amended plan.

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DTSC has also reviewed the Weekly Update Summary emailed to DTSC by your consultant on June 26, 2015. The email includes a spreadsheet (unit status 06 26 15.xlsx) that indicates that loose lead and other materials may have already been shipped to Exide's Muncie facility. Removal of equipment used to manage hazardous waste and contaminated materials from the Exide facility must be conducted in accordance with an approved Closure Plan unless specifically authorized by DTSC. DTSC has not approved a Closure Plan for the facility yet.

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

Sincerely,



Wayne Lorentzen, P.E.
Permitting Division
Hazardous Waste Management Program

cc: Sent Via Email

Exide Technologies, Inc.

Mr. Thomas Strang
Vice President - Environmental Health & Safety – Americas
Tom.Strang@na.exide.com

Mr. Chuck Giesige
Vice President – Recycling Operations – Americas
Chuck.Giesige@na.exide.com

Mr. Fred Ganster
Environmental Health and Safety
Fred.Ganster@exide.com

Mr. John Hogarth
Vernon Recycling Center
John.Hogarth@exide.com

Ms. Christine Graessle
Assistant General Counsel
Christine.Graessle@exide.com

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South Coast AQMD

Mr. Mohsen Nazemi
MNazemi1@aqmd.gov

City of Vernon

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

Los Angeles County Public Health

Mr. Angelo Bellomo
ABellomo@ph.lacounty.gov

Advanced Geoservices

Mr. Paul Stratman
pstratman@advancedgeoservices.com

Ms. Barbara Forslund
bforslund@advancedgeoservices.com

Ms. Jennifer DiJoseph
jdijoseph@advancedgeoservices.com

Department of Toxic Substances Control

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

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

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

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

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

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

Ms. Sarah Cromie
Senior Environmental Scientist
Hazardous Waste Management Program
Sarah.Cromie@dtsc.ca.gov

Mr. Wayne Lorentzen, P.E.
Senior Hazardous Substances Engineer
Permitting Division
Hazardous Waste Management Program
Wayne.Lorentzen@dtsc.ca.gov