



# DEPARTMENT OF TOXIC SUBSTANCES CONTROL

## **Overview of DTSC's Draft Revisions to the Closure Plan**

**Thursday, September 24, 2015**



# DEPARTMENT OF TOXIC SUBSTANCES CONTROL

## Outline

- Exide Project
- Closure Plan
- Advisory Group Input
- DTSC's Proposed Revisions



# Exide Project

## **Closure**

- **Draft Closure Plan**
- **Draft Environmental Impact Report (EIR)**

## ***Corrective Action***

- *Residential Cleanup*
- *Off-site Industrial*
- *On-site Cleanup*



# Draft Closure Plan

- Scope of Closure
  - Reserves funds
  - Plan for Clean-up
  - Identify extent of contamination
- DTSC's role

*Additional opportunities for:*

- *Public Comment and Public Hearing*



## DTSC

# Chronology of Draft Closure:

**May, 2015:** Exide Submitted Closure Plan to DTSC

**Jun, 2015:** DTSC review and:

- Presented Draft Closure Plan to Advisory Group
- Issued Notice of Deficiency on Draft Closure Plan

**Jul, 2015:** Received Revised Draft Closure Plan

**Aug, 2015:** DTSC Review and Draft Proposed Edits

**Sep, 2015:** **Advisory Group Recommendations and  
Technical Advisor Input**



## **Chronology of Draft EIR**

**May, 2015:** Notice of Preparation

**Jun, 2015:** Scoping meeting with Community

**July – October:** Preparing Draft EIR

**Nov, 2015:** Public Notice with the **Draft Closure  
Plan**



DTSC

# Environmental Impact Report

- CEQA
- Scope of Closure
- Identification of potential impacts
- Mitigation Measures

*Opportunity for Public input on Draft EIR:*

- *Public Comment and Public Hearing*



# Draft Closure Plan Proposed Revisions

## Closure Approach (3.1)

Closure of the site will be conducted in two phases.

### Phase 1:

- Inventory removal;
- Unit decontamination;
- Unit removal;
- Soil, soil gas and floor/pavement sampling;
- Decontamination of buildings
- Deconstruction of buildings to grade, *only* those containing former hazardous waste units

Interim Closure Performance Standards are presented for Phase 1.



# Draft Closure Plan Proposed Revisions

## Closure Approach (3.1)

### Phase 2:

- Address below grade impacts from former hazardous waste unit operations.

Final Closure Performance Standards for Phase 2 closure are to be developed and will be protective of human health and the environment as demonstrated by a site wide DTSC approved Health Risk Assessment.



# Draft Closure Plan Proposed Revisions

## Additional Reports

- Topographic Survey
- Trench Investigation Work Plan
- Revised Geologic Cross Sections
- Liquefaction Study
- Soil Management Plan
- Updated Monitoring Well Map
- Most Recent Groundwater Monitoring Report
- Sampling and Analysis Plan



# Draft Closure Plan Proposed Revisions

---

## Examples of Proposed Revisions for Advisory Group Input



## New Topographic Survey

### (2.3.1)

- Exide is required to dig out 5 feet of soil below ground surface beneath all the former hazardous waste units

#### ***Proposed Change to Plan:***

- DTSC will require Exide to complete a current topographic survey to make sure the right depth is reached for soil removal



# Draft Closure Plan Proposed Revisions

## Paste Thickening Unit (2.7.1)

This unit was replaced in late 2014 but was not used to manage waste materials. *Exide does not want to close as a hazardous waste unit.*

### ***Proposed Change to Plan:***

DTSC will require this Unit to be closed as a hazardous waste management unit.



# Draft Closure Plan Proposed Revisions

## Stormwater System (2.8.3.3)

Exide proposed that after being cleaned and tested, the following components of the storm water collection system will remain at the end of Phase 2:

- High Density Poly Ethylene (plastic) pipes
- Manholes and Sump (Unit 46)
- Stormwater pond

### ***Proposed Change to Plan:***

All of the above will be cleaned, tested and **removed** in Phase 2 of Closure.



# Draft Closure Plan Proposed Revisions

## Transportation (3.14)

A summary of locations receiving materials during closure is provided in Table 3.4. Transportation routes are provided in Appendix Z of the Draft Closure Plan.

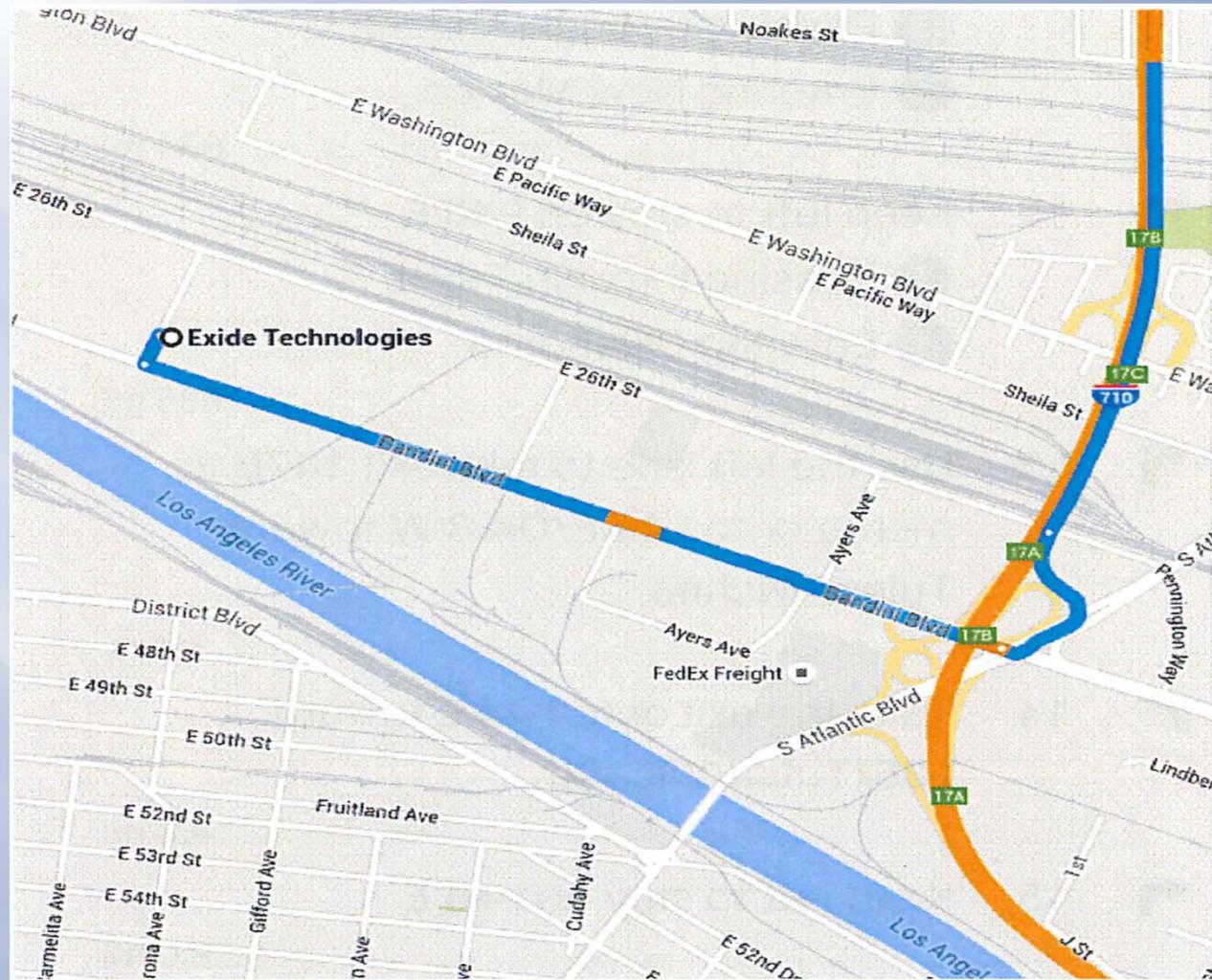
### ***Proposed Change to Plan:***

- All routes will proceed from the facility directly toward Bandini Boulevard, turn left onto Bandini Boulevard and merge onto I-710. Directions to 2801 N Madera Road will be revised to proceed to I-710 using this route.
- Any change from the Bandini to I-710 portion of routes will require DTSC pre-approval.



# Draft Closure Plan Proposed Revisions

## Transportation (3.14)





# Draft Closure Plan Proposed Revisions

## Transportation (3.14)

### *Proposed Change to Plan Continued:*

- Trucks using alternate routes will be documented on a transportation log that includes the date, time, truck identification, route taken and contents of load.
- The Transportation Log will be submitted to DTSC daily when there are entries.
- In emergency such as road closure situations, alternate facilities and routes may be proposed by Exide for pre-approval by DTSC.



# Draft Closure Plan Proposed Revisions

## Transportation (3.14)

Exide proposed marking trucks as required by Department of Transportation requirements.

### ***Proposed Change to Plan:***

DTSC will require that all trucks leaving the facility to be marked with a yellow flag having a visible area of at least 1 square foot, attached to the high rear end of the trailer in a location visible to pedestrians.



## Concrete Crushing (3.4.2.4)

Exide wants the option of concrete crushing onsite during Phase 2.

### ***Proposed Change to Plan:***

DTSC will not allow use of a concrete crusher during Phase 1 or Phase 2.



# Draft Closure Plan Proposed Revisions

## Closure Performance Standards

Throughout Exide's Closure Plan there were instances of inadequate performance standards for Closure.

Examples include:

- Using visual inspection for a “clean” determination
- Using a Clean Debris Surface as defined in the Alternate Treatment Standards for Hazardous Debris (USEPA Debris Rule (40 CFR 268.45

### ***Proposed Change to Plan:***

DTSC will add in the text from the actual closure performance standards from the regulations.

*(Example on next slide)*



# Draft Closure Plan Proposed Revisions

## Closure Performance Standards (3.2.6)

*For Example*

### Steel Structures and Debris

The Reverb Furnace Feed Room, Blast Furnace Feed Room, RMPS Building, Smelter Building, Baghouse Building, former Finished Lead Warehouse, and Desulfurization Building, and Container Storage Areas 1, 2 and 3 are all proposed for deconstruction. ~~will be deconstructed and removed. Steel proposed for recycling as scrap metal is not discarded pursuant to 22 CCR 66261.6(3)(ii2(b) and not a waste, and therefore not a hazardous waste per 22 CCR 66261.197.~~

In accordance with 22 CCR 66265.1102, at closure of a containment building, all waste residues, contaminated containment system components, contaminated subsoils, and structures and equipment contaminated with waste and leachate must be managed as a hazardous waste unless 22 CCR 66261.3(d) applies. The effectiveness of decontamination on metal building components, and structural steel proposed for deconstruction and intended for off-site scrap metal recycling will be determined by the Closure Performance Standard. The Closure Performance Standard for metal building components and structural steel proposed for deconstruction and intended for off-site scrap metal recycling is management as a hazardous waste unless 22 CCR 66261.3(d) applies. ~~visual inspection (i.e., will have a Clean Debris Surface as defined in the Alternate Treatment Standards for Hazardous Debris (USEPA Debris Rule (40 CFR 268.45)))~~. The materials intended for off-site recycling will also meet waste stream characterization requirements for the facility receiving the materials. Steel proposed for recycling that does not ~~achieve a Clean Debris Surface~~ meet the Closure Performance Standard ~~may~~ will be sent to a hazardous waste recycling facility, ~~disposed, or subject to testing to demonstrate it is not a hazardous waste.~~



# Draft Closure Plan Proposed Revisions

## Appendix G: Engineering Controls

### Truck Trailers (3.4.5.2)

Exide has proposed the trucks used for transporting materials off-site be lined with 6-mil poly propylene liners.

#### ***Proposed Change to Plan:***

DTSC will require that they change 6-mil poly propylene to 10-mil thickness for better leak protection.



# Draft Closure Plan Proposed Revisions

## Appendix G: Engineering Controls

### Temporary Enclosures (3.3.2)

*Current language in Draft Closure Plan:*

Deconstruction of concrete and masonry walls may be performed without the use of enclosures if characterization chip sampling for the interior and exterior of the wall has been performed and the results demonstrate that the concrete has total lead concentrations less than 320 mg/kg.

***Proposed Change to Plan:***

DTSC will add the following:

“However, effective dust control and air monitoring measures will be used throughout the course of the work regardless of total lead concentrations.”



# Draft Closure Plan Proposed Revisions

## Appendix H: Air Monitoring Plan

- **Existing Facility Perimeter Air Monitors**
  - Daily Monitoring
  - Remain in one place for duration of Closure unless SCAQMD requires them to be moved
- **Work Area Perimeter Air Monitors**
  - Daily Monitoring
  - Mobile to be located upwind and downwind of work
  - Real-time results; work to stop if safe levels are exceeded
- **Personal Air Monitors**
  - Air monitors worn by workers to test breathing zone; specifics to be determined by Contractor in the Health and Safety Plan



## Draft Closure Plan Proposed Revisions

---

# Options to Safely Remove Lead in Kettles Safely:

- Manual Demolition
- Water Cutting Equipment
- Remelting



# Options to Remove Lead in Kettles Safely

Topic	Manual Demolition	Water Cutting	Remelting
Description	Person inside kettle uses high pressure air to cut lead	Person inside kettle uses high pressure water to cut lead	Use existing natural gas burners to heat and pump lead out of kettles
Rate of Removal	<b>800 hours</b> to cut <b>100 tons</b> of lead	<b>400 hours</b> to cut <b>100 tons</b> of lead	<b>50 hours</b> per <b>100 ton</b> kettle
Time to Remove	<b>63 weeks</b> @ 5-days per week	<b>Several months</b> to build equipment, <b>+32 weeks</b> @ 5-days per week	~ <b>Two weeks</b> @ 5-days per week
Water Management	Collect and treat water used for dust control	Collect and treat 72,000 gallons/day of water containing lead grit	Collect and treat water used for dust control, if any needed



# Options to Remove Lead in Kettles Safely

Topic	Manual Demolition	Water Cutting	Remelting
<b>Employee Risk</b>	Person enters kettle, confined space entry; <b>potential for injury while moving lead and elevated lead in blood</b>	Person enters kettle, confined space entry; <b>potential for injury while moving lead and elevated lead in blood</b>	No people enter kettles, minimal risk to employees as using existing equipment and historically safe procedures
Air Emissions	<b>Low risk to public</b> as managed by existing baghouses and associated HEPA secondary filtration per existing AQMD permit	<b>Low risk to public</b> as managed by existing baghouses and associated HEPA secondary filtration per existing AQMD permit	<b>Low risk to public</b> as managed by existing baghouses and associated HEPA secondary filtration per existing AQMD permit



DTSC

# Contact Information

## **Wayne Lorentzen**

Senior Hazardous  
Substances Engineer  
8800 Cal Center Drive  
Sacramento, CA 95826  
(916) 255-3883  
wayne.lorentzen@dtsc.ca.gov

## **Sarah Cromie**

Senior Environmental Scientist  
8800 Cal Center Drive  
Sacramento, CA 95826  
(916) 255-3746  
sarah.cromie@dtsc.ca.gov



# DTSC

## **Closure Plan Link:**

<http://www.dtsc.ca.gov/HazardousWaste/Projects/upload/Exide-Closure-Plan-Link-080315.pdf>

## **Closure Plan Repositories**

Maywood Cesar Chavez Public Library  
4325 E. Slauson Avenue  
Los Angeles, CA 90270  
(323) 771-8600

Robert L. Stevenson Branch Library  
803 Spence Avenue  
Los Angeles, CA 90023  
(323) 268-4710

City of Commerce – Central Library  
5655 Jillson Street  
Commerce, CA 90040  
(323) 722-6600

City of Vernon – City Hall  
4305 S. Santa Fe Avenue, 2<sup>nd</sup> Floor  
Vernon, CA 90058-1714  
(909) 783-0147

DTSC Regional Office  
5796 Corporate Avenue  
Cypress, CA 90630  
(714) 484-5337



## **Next Steps:**

### **Anticipated Schedule -**

**Oct, 2015:** DTSC to Incorporate Revisions

**Nov, 2015:** **Start 60-days Public Comment Period for Draft Closure Plan and Draft EIR**

**Dec, 2015:** **Public Hearing for Oral Testimony**

**Jan, 2016:** DTSC Review of Public Comments, Prepare Response to Public Comments and Revise Closure Plan and EIR

**Mar, 2016:** Approval of Closure Plan and Finalize EIR