

Attachment 11
Dewatering Bin Specification



June 29, 2016

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

RE: Closure Plan Minor Variation for Portable Dewatering Container
Phase 1 Closure
Exide Technologies, Vernon, CA

Dear Mr. Lorentzen:

As DTSC is aware, Exide Technologies will use water to decontaminate equipment and structures as part of the closure process. Exide needs to store and filter this decontamination water before it is treated by Exide's waste water treatment plant (WWTP). Exide requests DTSC's approval to use portable, 25 cy steel roll-off containers to manage decontamination water prior to treatment in Exide's WWTP.

In the Closure Plan, Exide proposed to use a temporary filter press and a water storage feature to handle decontamination water, noting that additional details would be provided following equipment selection. [See, Closure Plan § 3.9.2]. Since submitting the Closure Plan, Exide further considered its options for handling decontamination water and consulted with its Phase I Closure contractor. Based on this due diligence, Exide now proposes a better solution that incorporates the water storage feature identified in the Closure Plan, but without a temporary filter press. As explained below, because Exide's proposal to use portable dewatering containers to store and filter water rather than a temporary filter press accomplishes the closure goals in a simplified manner while assuring proper storage and treatment of decontamination water, it represents a "minor variation" from the Closure Plan, which DTSC can approve without the need for Exide to formally resubmit the Closure Plan. [See, Closure Plan, Section 25.0 (*Minor variations may include...submission of additional implementation detail, and field variations of implementation methods and materials which meet the general goal and scope of the Closure Plan. . . The variations will be submitted to DTSC verbally in the field or via letter without resubmitting the complete Closure Plan.*)].

DESCRIPTION OF PORTABLE DEWATERING CONTAINERS

In order to optimize operation of the WWTP¹, it is important to separate solids from the decontamination water prior to transferring the water to the WWTP. Solids removal will occur in portable dewatering containers located within and adjacent to each area being decontaminated. The portable dewatering containers can be moved easily, even when full. They will be moved from one work area to another using a forklift or roll-off truck as decontamination activities progress. The specifics of work area and decontamination sequencing will be provided separately in the Contractor's Implementation Plan. Decontamination water will be collected at low points and sumps, and then transferred to the dewatering containers with a portable pump.

The portable dewatering containers that will be used are 25-cy (5,049 gallons total/gross capacity) steel roll-off containers with internal screens approximately 4 inches from the bottom of the container. A specification sheet is provided in Attachment A. A 100-micron filter fabric is placed over the screen. Decontamination water is pumped into the top of the container and filters through the filter fabric by gravity. Solids are retained on the filter fabric. No Volatile Organic Compounds (VOCs) are expected to be present in the decontamination water. Liquids collect in the bottom of the container and are removed by a vacuum truck through a 4-inch diameter temporary flexible hose at the bottom of the container. The vacuum truck will then exit the work area and discharge the liquid at the existing or temporary WWTP for further treatment. After the dewatering container is full with solids, it will be transported off-site for disposal of the solids and filter fabric as discussed in the Contractor's Implementation Plan. The dewatering container has a watertight gasketed rear door and will be subject to the shipping and transportation requirements of the Closure Plan. An empty dewatering container will be put in its place.

Use of the portable dewatering containers will occur throughout Closure Phase 1. It is anticipated that up to 10 dewatering containers would be used each day throughout the facility. Each dewatering container will be used on-site for a maximum of 90 days.

¹ Exide will use its existing WWTP for most of Closure Phase I; however, as stated in the Closure Plan, because certain waste water-related equipment eventually needs to be decommissioned Exide will at some point need to install a temporary WWTP, likely towards the end of Closure Phase I. Exide is working on a design for the temporary WWTP, and will coordinate with DTSC separately in this regard. Exide expects that the portable dewatering container will be important for both the existing and temporary WWTP.

THE PORTABLE DEWATERING CONTAINERS ARE 'CONTAINERS' UNDER THE REGULATIONS

California Code of Regulations (CCR) 66260.10 defines a container as '*any device that is open or closed, and portable in which a material can be stored, handled, treated, transported, recycled or disposed of*'. Per CCR 66260.10, the portable dewatering container is a bulk container as it has '*a capacity greater than 119 gallons (450 liters), which is used to transport hazardous waste(s) ... in bulk by ...highway..., including but not limited to, ... roll-off bins...*'

The dewatering containers Exide proposes to use are "containers" under the regulations for the following reasons:

- The containers are fully portable, even when full. In this way, the containers are akin to railroad cars, and, according to DTSC guidance: "Railroad cars are 'containers', since they are portable when full" [DTSC January 2002 Fact Sheet Hazardous Waste Generator Requirements, p.8].
- Unlike tanks -- which are defined in the regulations as being "stationary" -- the containers will not be stationary. Rather, Exide proposes to use containers with wheels (see attached specification sheet), designed to be moved around the facility using a forklift or roll-off truck.
- There will be no hard-piping attached to the containers because the containers are intended to be mobile. [DTSC January 2002 Fact Sheet Hazardous Waste Generator Requirements, p.8 (devices designed to allow hard piping are considered to be tanks)]. Water will be collected using sumps and filter fabric and removed via a flexible hose.

Exide ("Exide" means Exide or its designee) will manage the portable dewatering containers in accordance with CCR 66265.171 – 174 and 66262.34 as follows:

1. In good condition (CCR 66265.171);
 - a. Containers will be inspected upon arrival at the facility and the pre-loading checklist from Closure Plan Appendix G will be completed. The inspection will check that the empty container is visually clean, the gasket and hinges are in good condition, and the container is free of holes or damage. Containers which are not in good condition will be rejected.
2. Compatible with contents (CCR 66265.172);
 - a. The containers are constructed of steel, which is compatible with the decontamination liquids.
3. Closed, except when adding or removing hazardous waste (CCR 66265.173);
 - a. The containers have hard steel tops which will be closed, except when the container is being filled.

4. Managed to avoid rupture or leaks (CCR 66265.173);
 - a. The containers have water-tight gasketed doors. The gaskets will be inspected prior to use, and the door will remain closed when the container is in-use.
5. Inspected weekly (CCR 66265.174); and,
 - a. Exide will conduct a weekly inspection to document these requirements are met.
6. Properly labeled (CCR 66262.34).
 - a. Exide will label each container with a hazardous waste label, including contents and accumulation start date.

The dewatering containers will be located in areas undergoing wet decontamination methods. DTSC regulations do not appear to require secondary containment for containers. [See, DTSC Hazardous Waste Generator Requirements Fact Sheet dated January 2002, II.C(4) (“DTSC does not require secondary containment for a generator’s hazardous waste containers”)]. However, Exide will still provide secondary containment by managing the containers in accordance with Closure Plan Appendix G, which requires Exide to implement engineering controls for liquid infiltration at floors and sumps within decontamination areas. Consistent with the Closure Plan, prior to wet decontamination floors and sumps will be vacuum cleaned and inspected for cracks and other damaged areas where liquids could infiltrate. Cracks and damaged areas will be sealed prior to the start of wet decontamination. The prepared floors and sumps will provide secondary containment for the dewatering containers while in-use.

While not expected to occur, if the containers are located outside an area of prepared floor, the containers will be staged on plastic sheeting with a temporary berm to provide secondary containment. When utilizing plastic sheeting/temporary berms for secondary containment, the maximum liquid volume in the container shall not exceed the secondary containment volume. Other than DTSC’s approval of this request, no additional operating permits or approvals are necessary from DTSC, AQMD or the City of Vernon for the portable dewatering containers.

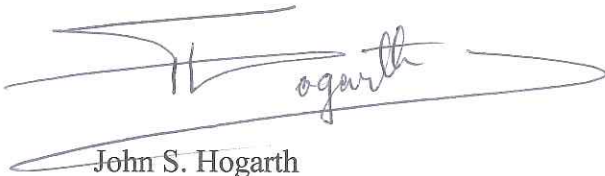
CLOSURE PLAN MINOR VARIATION

Exide’s request to use portable dewatering containers represents a “minor variation” from the Closure Plan that does not require resubmitting the Closure Plan. Section 25 of the Closure Plan was drafted specifically to account for field variations and implementation details that could be approved by DTSC without the burden of formally revising the Closure Plan for public comment, so long as the variation “meet[s] the general goal and scope of the Closure Plan.” [Closure Plan, § 25]. In this case, neither the general goal of closing the facility nor the specific goal of managing decontamination water has materially changed. Indeed, the use of portable containers rather than a temporary filter press accomplishes closure goals in a simplified manner while assuring proper storage and treatment of decontamination water.

Exide requests written approval from DTSC to use portable dewatering containers during closure. Your prompt reply is greatly appreciated so that closure activities can begin without delay following DTSC's approval of the Closure Plan. Please contact John Hogarth at (323) 262-1101 x275 with any questions.

Sincerely,

EXIDE TECHNOLOGIES

A handwritten signature in black ink, appearing to read "Hogarth", is written over a horizontal line. The signature is stylized and cursive.

John S. Hogarth
Plant Manager

cc: M. Haynes, SCAQMD
L. Pozzebon, City of Vernon
D. Henke, Exide
T. Strang, Exide
N. Serieys, Exide/ALTA
K. Plachy, Quantum
P. Stratman, AGC
J. DiJoseph, AGC

ATTACHMENT A



Bolted-in perforated basket for easy removal



25 Yard Dewatering Box with Steel Hard Top

(Available in select locations)

Capacity: 25 yd
Height: 6' 6"
Width: 8' 6"
Length: 23'
Tare Weight: 9,000 lbs

All sizes are approximate

At Adler Tank Rentals, we are committed to providing safe and reliable containment solutions for all types of applications where performance matters.

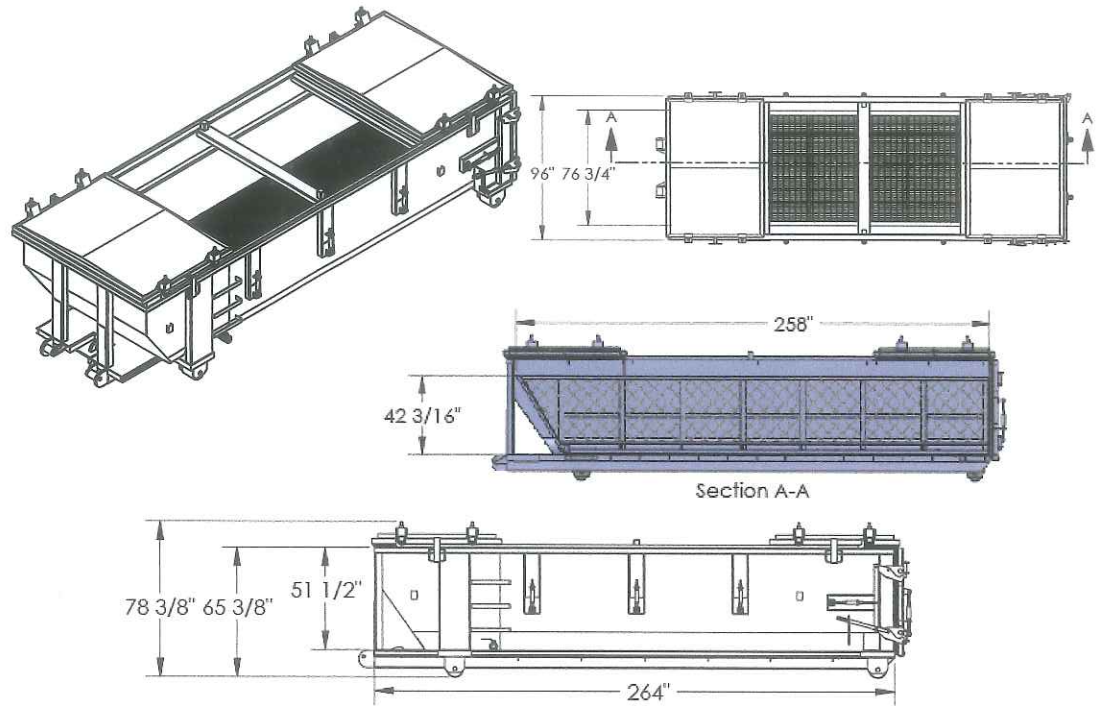
Fitted with a bolted-in, easily removed perforated basket, the 25 Yard Dewatering Box with Steel Hard Top is designed for convenient use and easy cleaning. Featuring a fully gasketed waterproof door, valved drains and a variety of fabric filter liner options, this product is topped with a hard steel top to protect the contents from unwanted debris, precipitation and visibility.



Mechanical Features

- Sliding split roof lid equipped with ratcheting binders to lock in place
- 4" Drains
- Standard roll-off container with hard steel top
- Horizontal swinging, fully gasketed, watertight door with no crossbar to trap debris when dumping
- Bolted-in perforated basket for easy removal to assist in cleaning
- Compatible with standard roll-off frame truck
- Watertight gasketed rear door

25 Yard Dewatering Box with Steel Hard Top



Options

- Nominal 100 micron geotextile fabric filter liners, individually packaged and fitted for rapid installation
- 250 micron synthetic fabric filter liners, individually packaged and fitted for rapid installation
- 400 micron synthetic fabric filter liners, individually packaged and fitted for rapid installation

Comprehensive Service

Adler Tank Rentals provides containment solutions for hazardous and non-hazardous liquids and solids. We offer 24-hour emergency service, expert planning assistance, transportation, repair and cleaning services. All of our rental equipment is serviced by experienced Adler technicians and tested to exceed even the most stringent industry standards.

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