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April 10, 2015

Rizgar Ghazi, P.E.  
Branch Chief  
Office of Permitting  
Department of Toxic Substances Control  
8800 Cat Center Drive  
Sacramento, CA 95826-3200

Re: Exide Technologies (CAD 097854541) - Shipment Schedule Extension

Dear Mr. Ghazi:

Exide Technologies ("Exide") has reviewed DTSC's April 2, 2015, letter responding to Exide's request for an extension until June 1 to ship reverb feed material out of the Containment Building.<sup>1</sup> As you are aware, Exide is currently in the process of moving feed material to its facility in Muncie, Indiana. Exide provides weekly tracking reports to DTSC, detailing Exide's diligent efforts to ship all the reverb feed. Shipping the material presents numerous challenges, but Exide is meeting all of those challenges and is working expeditiously with its contractors to complete this important task.

Below, Exide responds to certain comments made in DTSC's April 2 letter.

- DTSC states that it "expected that shipments would occur on a 7-day a week basis." However, Exide's February 23, 2015 Shipment Plan states: "Loading and shipment is scheduled to begin three days after approval of this plan and will occur Monday through Friday, 5 am to 5 pm." [Shipment Plan, page 4 (emphasis added)]. In its February 27, 2015 letter approving the Shipment Plan, DTSC did not modify Exide's 5-day per week schedule. As such, it is evident that Exide proposed, and DTSC approved, a 5-day per week shipment schedule. The Shipment Plan approved by DTSC also states that shipment will occur on "work days" (as opposed to simply saying "days" or "calendar days"), which does not include weekends. These facts justify Exide's request – taking into account work days only, Exide accurately predicted that reverb feed shipment would end around the end of May. Thus, Exide's request for an extension until June 1 is reasonable. Exide is working quickly and may complete the task

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<sup>1</sup> Exide seeks a corresponding extension until June 1 to store remaining reverb feed in the Containment Building pending shipment.

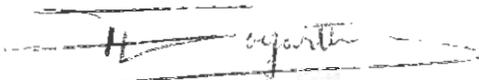
before June 1, but additional days may be necessary, and Exide needs to account for potential third-party logistical issues.

- After some initial logistical hurdles with the trucks, Exide has significantly ramped-up truck shipments over the past several weeks. Indeed, in the 5<sup>th</sup> week since shipping started, 42 trucks were used to ship feed over a 5-day period, at a rate of over 8 trucks per day. This week, Exide will have shipped almost 60 loads, at a rate of almost 12 trucks per day. This is a higher rate than Exide even anticipated. As such, Exide has been and continues to be diligent in shipping reverb feed. While Exide was at one point considering rail transport, Exide determined this option was not feasible, and the method of using trucks has been efficient.

- Exide believes these clarifications adequately address DTSC's concern. Exide does have an effective plan in place and it is implementing that plan. As stated above, Exide is now shipping out significantly more than 6 trucks per day on average. Exide has no incentive to delay because, with pending closure, Exide has no continuing use for the feed material in Vernon.

In conclusion, Exide respectfully requests an extension of time until June 1, 2015 to remove reverb feed from the Containment Building.

Sincerely,

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

John Hogarth  
Exide Technologies  
Vernon Plant Manager