



2700 S. Indiana Street
Vernon, CA 90058

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November 6, 2019

Via Email and U.S. Mail

Mr. Peter Ruttan
Unit Chief, Closure and Corrective Action
Exide Cleanup Project
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

Re: Closure Schedule; Exide Technologies
Vernon, California, EPA ID No. CAD097854541

Dear Mr. Ruttan:

Pursuant to the Department of Toxic Substances Control's ("DTSC's") August 30, 2019 correspondence offering Exide Technologies ("Exide") an opportunity to submit an updated schedule for the onsite closure process at the Exide facility located at 2700 South Indiana Street, Vernon, CA 90058 ("Vernon Facility"), Exide is submitting the attached reconstituted closure schedule¹ including enforceable material milestones.² As part of this reconstituted schedule, we propose to re-phase removal of the existing Waste Water Treatment Plant ("WWTP") to Phase 2 of the process.

Exide is in the process of closing the Vernon Facility pursuant to a DTSC-approved Closure Plan that consists of four components: Phase 1 (Closure); Phase 2 (Contingent Closure); Post-closure; and Contingent Post-closure. Incorporated into the Closure Plan is a Closure Implementation Plan ("CIP"), an attachment to which is the schedule for implementation of Phase 1 closure. Work on Phase 1 closure activities pursuant to the CIP began in November 2017 and has been ongoing. By this letter, Exide hereby requests approval of the enclosed reconstituted closure implementation schedule. As described below, the main reasons for this request arise from the cumulative impacts of several discoveries and developments at the Vernon Facility related to the safe and practical implementation of Phase 1.

By way of background, the CIP provides for decontamination and deconstruction of the buildings and equipment in Phase 1 in a prescribed sequence, beginning with the west buildings (Segment 1), moving to the east buildings (Segment 2), and ending with the center buildings

¹ See Attachment A.

² See Attachment B.

(Segment 3). The reason the CIP sequences closure activities in this manner is so that decontamination and deconstruction of each Segment can take place fully enclosed by a large tent-like structure known as the Full Enclosure Unit (“FEU”). The FEU maintains a negative pressure, which prevents lead-contaminated dust and other debris generated during decontamination and deconstruction from escaping the FEU.

The FEU must be sturdy, but also sufficiently portable to be redeployed from Segment 1 to Segment 2, and then to Segment 3. To meet these requirements, the FEU uses a relatively unusual “HAKI” truss system as the roof, standard industrial scaffolding for the walls, and fire-retardant HIPWrap and Scaf-lite plastic sheets to complete the negative pressure enclosure. To our knowledge, no other multi-story, large former treatment storage and disposal facility in California similar to the Vernon Facility has been decommissioned, nearly in its entirety, under a negative air pressure structure like the FEU.

Maintaining and moving the FEU, and performing physically demanding closure activities under the FEU at this scale while maintaining worker safety, has presented a number of practical challenges. An illustrative but not exhaustive list of the circumstances that have most significantly affected implementation of Phase 1 includes:

- **Unanticipated Sealing of Segment 1 Floors:** Following decontamination, sampling of the concrete floors in Segment 1 buildings identified concentrations of lead that exceeded the established closure standard. Upon assessment, Exide and DTSC concurred that additional cleaning of the concrete likely would be ineffective at removing more contaminants and also impractical. To reduce the potential for fugitive dust to become airborne following removal of the Segment 1 FEU, and to mitigate the potential for direct exposure to workers at the facility, Exide paved over the entire floor of the Segment 1 footprint with asphalt. This additional barrier covering the underlying impacted materials was added for public and worker safety, and has effectively reduced risk. This activity was not anticipated in the CIP and these efforts required time not specified in the original Phase 1 schedule.
- **Column Line N Deconstruction:** During deconstruction of Segment 1, it was discovered that certain beams, columns, and other structural building components were dangerously deteriorated beyond what was anticipated in the CIP. A structural engineer was engaged to assess the structural integrity of these degraded beams and columns. This assessment indicated that additional shoring and temporary support was required to maintain worker safety and mitigate the potential for building collapse. The design, procurement, fabrication, and installation of the shoring significantly elongated the work. In parallel, sampling of a concrete portion of a wall on the Column Line N by Exide showed that lead levels were sufficiently elevated requiring that this wall would have to be deconstructed within the Segment 1 FEU. This was in contrast to the original plan, which allowed for deconstruction of the concrete Column Line N wall outside of the FEU. Rather than concurrent deconstruction inside and outside of the FEU, Exide had to sequence more work entirely within the

FEU and expand the FEU to cover this portion of the structure. The requirement to install shoring and inability to deconstruct this wall as a concurrent task increased the duration of the Segment 1 FEU.

- **Impacts of Heat on Working under the FEU:** A rigorous personal protective equipment (PPE) regime has been established at the site to help mitigate the potential worker exposure to lead. The PPE regime includes relatively heavy, NIOSH-approved respirators, disposable coveralls, hoods, booties and work gloves. This PPE regime is protective, but increases the risk of overheating. In the summer of 2019 there were multiple days of excessive and sustained heat and workers in full PPE were required to take more frequent cooling and hydration breaks to manage the potential for health stress. This reduced the amount of time they were able to work under the FEU and disrupted some sequencing of work.

Exide (working in collaboration with DTSC) has developed some novel physical, engineering, structural, and other practical solutions to the challenges this project has presented while maintaining safety and compliance as priority objectives. Many lessons have been learned in addressing these challenges and the enhanced knowledge and experience Exide has gained during the practical implementation of this project are reflected in the reconstituted schedule.

Earlier this year, Exide began to understand that the cumulative effects of dealing with challenges like those described above have rendered the current CIP implementation schedule increasingly non-viable and un-representative of the actual project constraints. DTSC's third-party project oversight consultant Parsons monitors progress on a daily basis and provides DTSC daily progress reports. Hence DTSC, too, began to develop concerns about the project timetable.

As these concerns crystalized, Exide initiated a rigorous process, both internally and with its contractor AIS, to define, determine, and address the root cause(s) of project implementation challenges. Exide also installed a new management team (of which I am a part) to take a fresh look at the situation and to investigate whether possible actions, such as hiring additional workers and adding additional shifts, might help accelerate the pace of Phase I work. Ultimately, however, the challenges would not be resolved by additional commitment of field resources. Exide has at all times committed robust resources to Phase I and it is the project's physical and operational constraints—including limited space under the FEU, necessary sequencing of projects (and thus limited concurrent project work), safety imperatives, cleaning and waste transportation protocols—that have combined to limit flexibility to accelerate the Phase I work.

In the absence of realistic opportunities to accelerate closure through adding resources or streamlining tasks, Exide initiated development of a reconstituted schedule for the balance of the Phase 1 work. To facilitate its development, Exide added additional human resources, including a scheduling expert resident with GeoSyntec and new corporate personnel. Exide worked intensively with its contractor AIS and engaged all available Vernon Facility personnel on efforts to reconstitute the schedule. Over the course of approximately a month, this new team (which included AIS) held a series of all-day workshops (including all day work on weekends for some team members) to develop a detailed and robust reconstituted schedule that will achieve substantial

completion of Phase I at the earliest feasible time while maintaining a priority on safety and compliance. In addition, beginning in September, Exide met regularly with DTSC personnel to present progress updates, discuss draft schedules (as appropriate), and to solicit and consider DTSC's suggestions on scheduling issues.

The outcome of this intensive and cooperative team effort is a fully reconstituted schedule for the balance of the Phase 1 work that is robust and resilient because it, among other things:

- is sufficiently detailed to identify and understand the interaction between tasks and the sequencing constraints;
- is resilient in that task durations have been developed to incorporate lessons learned and to mitigate potential small disruptions to critical path so that disruptions to one task do not immediately cascade to other tasks;
- considers resource requirements to ensure that necessary workers, equipment, and staging and laydown areas are in place on time;
- integrates into one schedule both Exide and AIS tasks/actions and their required interactions; and
- includes provisions for additional and more realistic progress tracking elements that will allow potential schedule disruptions to be rapidly identified and addressed, and adherence to the reconstituted schedule to be verified.

Based on these factors, Exide is confident the reconstituted schedule is achievable.

The reconstituted Phase 1 closure schedule has been planned and is currently being carried out in compliance with the approved Closure Plan and CIP in a manner that preserves the safety of site workers, the community, and the environment. The attached reconstituted schedule integrates our understanding of the remaining scope of work, lessons learned during Phase 1 activities, and supplemental information and knowledge we have gained about the practicality and success of various methodologies. Based on this acquired knowledge, the key reasons for reconstitution of the Phase I work schedule generally arise from, or relate to:

- enhancement of worker and public safety protections;
- new information discovered as the project unfolded; and
- novel, practical, engineering, and construction challenges inherent in a large deconstruction project conducted under negative air pressure in a temporary, mobile structure.

In environmental remediation projects of this type, it should be anticipated that some unknown and variable conditions may be encountered that may require modification to the planned sequence of activities, or equipment used, to ensure the safety, quality, and efficiency of the work. A robust program has been developed to proactively identify circumstances where a change in

conditions may necessitate a change in approach so that any such changes, and their potential impact to the closure implementation schedule, can be discussed with DTSC.

There also are some conditions that, although they have a low probability of occurrence, would have a very significant impact on our ability to complete Phase 1 on schedule were they to occur. Examples of these types of conditions include:

- changes in local, State, or Federal laws, regulations, and guidance as they relate to the planned Phase 1 Closure;
- insolvency or bankruptcy of our key Contractors, AIS and Safway;
- inability to freely access portions of the site due to rail operations and railroad restrictions;
- changes in disposal and handling requirements of some of the specifiable equipment such as electrical transformers;
- changes to waste disposal options, including changes to onsite waste storage requirements, transportation requirements, landfill capacity, permit or waste profile or shortages of transportation units due to demand on other projects in the Southern California area;
- weather conditions, including wind, rain, extreme high and low temperatures, and duration and severity of weather events that exceed what has been experienced in the last 22 months at the Site; and
- removal activities identify a site feature, fixture, equipment or other condition long obscured by operations, which only becomes visible as surface features are removed. Such previously unknown and long concealed conditions could include former electrical vaults (including vintage electrical equipment with PCBs), sumps, underground storage tanks previously filled in and paved over, or otherwise abandoned prior to an era where USTs were regulated, or buried debris. While these conditions are more likely to be an issue in Phase 2, their potential to impact to the overall schedule would be a case-by-case determination.

Finally, the approved Closure Plan anticipates that the existing WWTP will remain operational as long as possible, but will be removed by the end of Phase 1, to be replaced by a temporary wastewater treatment system with a simpler treatment process that has a lower capacity and is less expensive to operate. However, during our review it became clear that retaining the existing system, which would take three to five months to dismantle, has a larger capacity, is more robust, and is proven to work, provides more confidence in being able to manage site water in compliance with requirements. Therefore, the reconstituted schedule re-phases removal of the WWTP to the end of Phase 2.

Mr. Peter Ruttan
November 6, 2019
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The reconstituted schedule for the Vernon Facility, for which Exide seeks DTSC's approval, is enclosed with this letter. Exide is committed to implementing the CIP under this reconstituted schedule as safely and expeditiously as is feasible. As the party that bears nearly all costs, including the additional oversight, construction, and overhead expenses associated with the previous schedule interruptions, Exide derives no benefit from completing closure activities one day later than necessary. I look forward to continued cooperation with DTSC in this matter. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Grace C. Yeh', with a stylized, cursive script.

Grace C. Yeh
Executive Director
Site Remediation, Closure and Compliance Operations
Exide Technologies

Enclosures

cc: (via email)

Mr. Grant Cope, DTSC
Ms. Suhasini Patel, DTSC
Mr. Matt Wetter, DTSC
Mr. Dan Gamon, DTSC
Ms. Olivia Wright, DTSC
Mr. Peter Thyberg, DTSC

Mr. Tom Blaney, Parsons
Mr. John Gasparovic, Exide
Mr. Michael Judd, Exide
Ms. Lacey Chitwood, Exide
Ms. Jully Sieglaff, Exide

EXIDE PHASE 1 CLOSURE ACTIVITIES

VERNON, CA

ID	Task Name	Duration	Start	Completion	
1	CLOSURE PROJECT PHASE 1	588 days	Fri 9/13/19	Tue 12/14/21	
5	FEU SEGMENT 1 OPERATIONAL COMPLETE	0 days	Wed 9/11/19	Wed 9/11/19	
6	NON FEU SEGMENT 2 OPERATIONS	62 days	Fri 9/13/19	Wed 12/25/19	
7	REGULATED BUILDINGS ENCLOSURE -Segment 2 - SCAFFOLD	22 days	Mon 9/16/19	Thu 10/24/19	
8	REGULATED BUILDINGS ENCLOSURE -Segment 2 -HAKI & WRAP	23 days	Fri 10/18/19	Wed 12/4/19	
9	FEU 2 FINAL CHECK	9 days	Tue 11/19/19	Wed 12/4/19	
10	REVERB FURNACE	12 days	Fri 9/13/19	Tue 10/15/19	
11	Heavy Kettle Inventory Removal	62 days	Fri 9/13/19	Fri 5/29/20	
12	A-FRAME #1 (STACK) ENCLOSURE	15 days	Mon 10/7/19	Thu 11/7/19	
13	A-FRAME 1 (STACK) DECON AND REMOVAL	12 days	Wed 10/30/19	Wed 11/27/19	
14	FEU SEGMENT 2 OPERATIONAL	192 days	Wed 12/4/19	Wed 10/14/20	
15	BLAST FEED BUILDING (UNIT 34) AND EQUIPMENT -Segment 2	192 days	Wed 12/4/19	Wed 10/14/20	
16	ROOFING SYSTEM DECON AND REMOVAL	15 days	Wed 12/4/19	Wed 1/22/20	
17	SIDING REMOVAL	13 days	Tue 12/31/19	Fri 3/13/20	
18	FINAL DECON (REMAINING SYSTEM ELEMENTS, STRUCTURAL, STEEL, FLOORS ETC)	8 days	Fri 3/13/20	Thu 3/26/20	
19	DECON AND REMOVAL OF REMAINING CRITICAL MEP SYSTEMS	2 days	Thu 3/26/20	Mon 3/30/20	
20	DECON AND REMOVAL OF STRUCTURAL STEEL	10 days	Mon 3/30/20	Mon 8/3/20	
21	COKE EQUIPMENT REMOVAL	3 days	Tue 12/31/19	Wed 1/29/20	
22	SUBGRADE COKE EQUIPMENT DECON & REMOVAL	15 days	Mon 1/6/20	Thu 2/20/20	
23	DECON AND REMOVAL OF NON ESSENTIAL SYSTEMS	2 days	Mon 2/24/20	Wed 7/29/20	

Unexpected circumstances out of Exide's control e.g. key contractor insolvency or discovery of heretofore unknown facility conditions, even if foreseeable in theory, will be classified as force majeure events for purposes of the 2014 Order.

Task

Split

Milestone

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Summary

Project Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

100

0 Critical Split

Critical

Critical Split

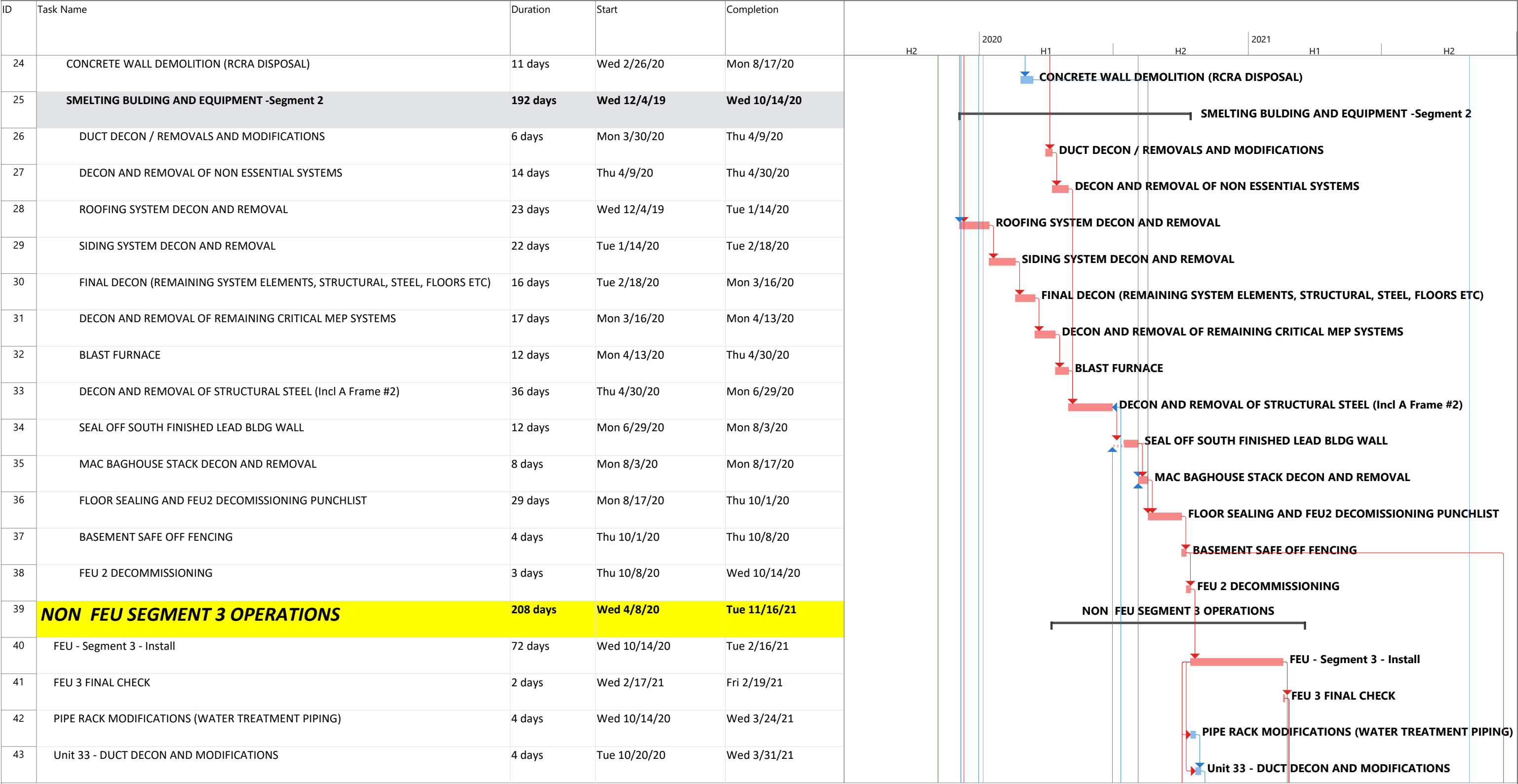
Progress

Manual Progress

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EXIDE PHASE 1 CLOSURE ACTIVITIES

VERNON ,CA



Unexpected circumstances out of Exide's control e.g, key contractor insolvency or discovery of heretofore unknown facility conditions, even if foreseeable in theory, will be classified as force majeure events for purposes of the 2014 Order.

Task

Split

Milestone

Summary

Project Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

Critical

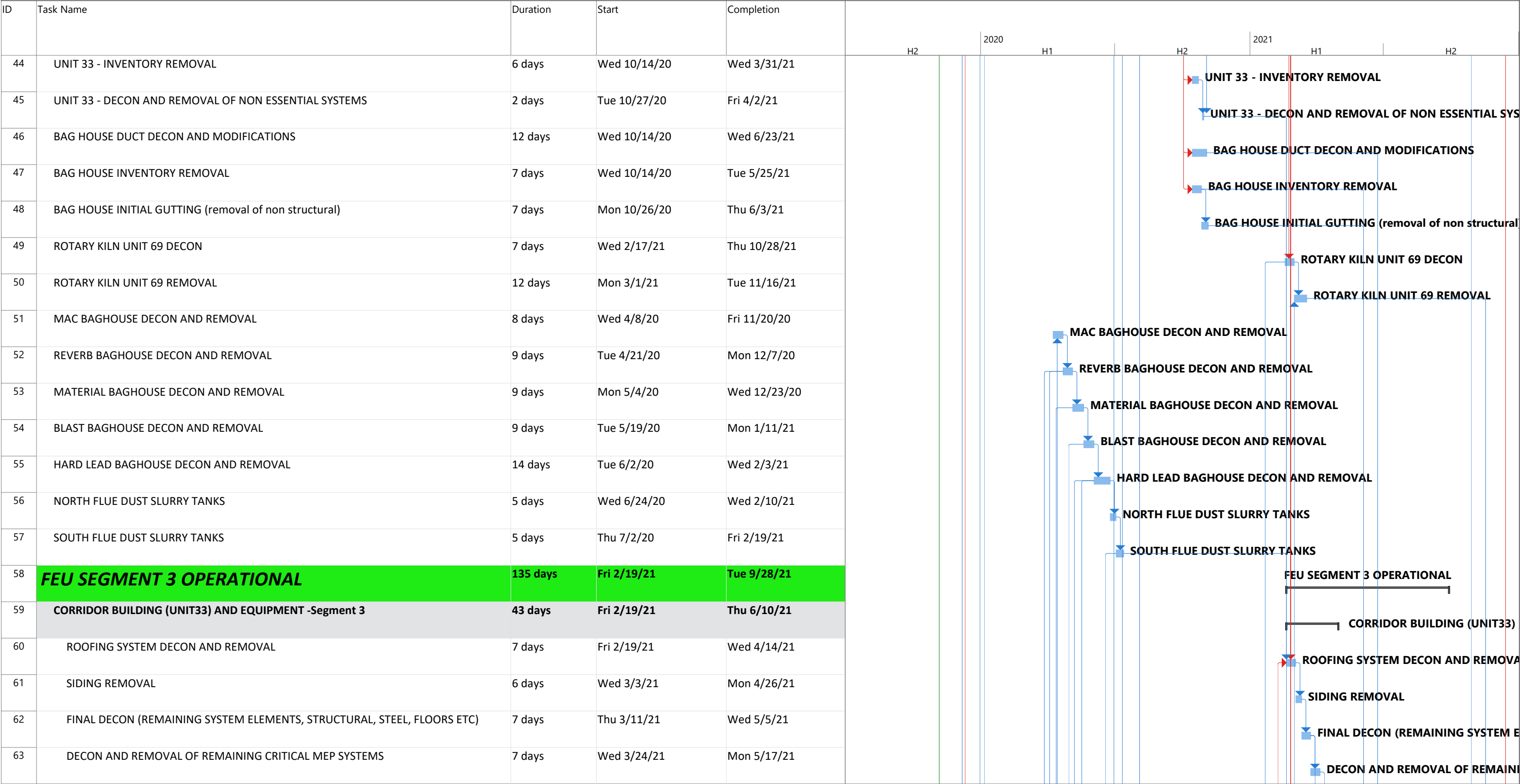
Critical Split

Progress

Manual Progress

EXIDE PHASE 1 CLOSURE ACTIVITIES

VERNON ,CA



Unexpected circumstances out of Exide's control e.g, key contractor insolvency or discovery of heretofore unknown facility conditions, even if foreseeable in theory, will be classified as force majeure events for purposes of the 2014 Order.

Task

Split

Milestone

Summary

Project Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

Critical

Critical Split

Progress

Manual Progress

EXIDE PHASE 1 CLOSURE ACTIVITIES					VERNON ,CA
ID	Task Name	Duration	Start	Completion	
64	DECON AND REMOVAL OF STRUCTURAL STEEL	8 days	Mon 4/5/21	Mon 5/31/21	
65	CONCRETE WALL DEMOLITION	8 days	Fri 4/16/21	Thu 6/10/21	
66	BAGHOUSE BUILDING AND EQUIPMENT - Segment 3	109 days	Fri 2/19/21	Mon 8/16/21	
67	SOFT LEAD BAGHOUSE DECON AND REMOVAL	9 days	Fri 2/19/21	Fri 3/5/21	
68	ROOFING SYSTEM DECON AND REMOVAL	19 days	Fri 2/19/21	Tue 3/23/21	
69	SIDING SYSTEM DECON AND REMOVAL	16 days	Tue 3/23/21	Fri 4/16/21	
70	MATERIAL HANDLING BAGHOUSE STACK DECON AND REMOVAL	9 days	Fri 4/16/21	Mon 5/3/21	
71	KILN DRYER BAGHOUSE STACK DECON AND REMOVAL	4 days	Mon 5/3/21	Mon 5/10/21	
72	HARD LEAD BAGHOUSE STACK DECON AND REMOVAL	8 days	Mon 5/10/21	Mon 5/24/21	
73	SOFT LEAD BAGHOUSE STACK DECON AND REMOVAL	8 days	Mon 5/24/21	Thu 6/3/21	
74	FINAL DECON (REMAINING SYSTEM ELEMENTS, STRUCTURAL, STEEL, FLOORS ETC)	12 days	Thu 6/3/21	Wed 6/23/21	
75	DECON AND REMOVAL OF REMAINING CRITICAL MEP SYSTEMS	9 days	Wed 6/23/21	Wed 7/7/21	
76	DECON AND REMOVAL OF STRUCTURAL STEEL	24 days	Wed 7/7/21	Mon 8/16/21	
77	OXIDATION TANK AREA UNIT 24 AND 25 -Segment 3	49 days	Wed 7/7/21	Mon 9/27/21	
78	UNIT 24,25 OXIDATION TANK AND STRUCTURE DECON	4 days	Wed 7/7/21	Mon 8/16/21	
79	UNIT 24,25 OXIDATION TANK AND STRUCTURE REMOVAL	13 days	Mon 8/16/21	Mon 9/6/21	
80	UNIT 24,25 OXIDATION TANK CONTAINMENT AREA DECON	2 days	Mon 9/6/21	Wed 9/8/21	
81	FLOOR SEALING AND FEU3 DECOMISSIONING PUNCHLIST	25 days	Mon 8/16/21	Mon 9/27/21	
82	FEU 3 DECOMISSIONING	1 day	Mon 9/27/21	Tue 9/28/21	
83	POST FEU 3 OPERATIONS	425 days	Fri 1/3/20	Thu 12/2/21	
Unexpected circumstances out of Exide's control e.g, key contractor insolvency or discovery of heretofore unknown facility conditions, even if foreseeable in theory, will be classified as force majeure events for purposes of the 2014 Order.					
Task					
Split					
Milestone					
Summary					
Project Summary					
Manual Task					
Duration-only					
Manual Summary Rollup					
Manual Summary					
Critical					
Critical Split					
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Manual Progress					
ATTACHMENT A					
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EXIDE PHASE 1 CLOSURE ACTIVITIES					VERNON ,CA
ID	Task Name	Duration	Start	Completion	
84	REGULATED BUILDING ENCLOSURE - Segment 3 - Dismantle	41 days	Tue 9/28/21	Thu 12/2/21	
85	DECON FINISHED LEAD BUILDING	13 days	Fri 1/3/20	Mon 6/29/20	
86	DECON TORIT BAGHOUSE WITHIN TEMPORARY ENCLOSURE (Ensure Oversight has Monitoring as required)	9 days	Wed 9/8/21	Thu 9/23/21	
87	SITE WIDE DECON	27 days	Fri 4/30/21	Tue 7/27/21	
88	CONTAINER STORAGE AREA ENCLOSURES	5 days	Fri 4/30/21	Fri 6/18/21	
89	UNIT 1 - CENTRAL CONTAINER STORAGE	3 days	Mon 5/10/21	Thu 6/24/21	
90	UNIT 2 - WEST CONTAINER STORAGE	2 days	Thu 5/13/21	Tue 6/29/21	
91	UNIT 3 - WEST CONTAINER STORAGE # 2	2 days	Mon 5/17/21	Thu 7/1/21	
92	UNIT 103 ENCLOSURE	2 days	Thu 5/20/21	Mon 7/5/21	
93	UNIT 103 DECON	1 day	Tue 5/25/21	Tue 7/6/21	
94	UNIT 103 DEMOLITION (CORING)	1 day	Wed 5/26/21	Wed 7/7/21	
95	MOBILE EQUIPMENT WASH ENCLOSURE	2 days	Thu 5/27/21	Mon 7/12/21	
96	UNIT 35 MOBILE EQUIPMENT WASH DECON AND REMOVAL	3 days	Mon 5/31/21	Thu 7/15/21	
97	TRUCK WASH ENCLOSURE	2 days	Thu 6/3/21	Mon 7/19/21	
98	TRUCK WASH INVENTORY REMOVAL	1 day	Mon 6/7/21	Tue 7/20/21	
99	DECON UNIT 87 - WEST TRUCK WASH	3 days	Tue 6/8/21	Tue 7/27/21	
100	SUMP SYSTEM DECON	35 days	Mon 6/14/21	Mon 9/20/21	
101	WATER SOFTENER BUILDING SUMP - DECON	1 day	Mon 6/14/21	Wed 7/28/21	
102	WATER SOFTENER BUILDING SUMP - REMOVAL	1 day	Tue 6/15/21	Thu 7/29/21	
<div>Unexpected circumstances out of Exide's control e.g, key contractor insolvency or discovery of heretofore unknown facility conditions, even if foreseeable in theory, will be classified as force majeure events for purposes of the 2014 Order.</div> <div><div>Task</div><div>Split</div><div>Milestone</div></div> <div><div></div>Summary</div> <div><div></div>Project Summary</div> <div><div></div>Manual Task</div> <div><div></div>Duration-only</div> <div><div></div>Manual Summary Rollup</div> <div><div></div>Manual Summary</div> <div><div></div>Critical</div> <div><div></div>Critical Split</div> <div><div></div>Progress</div> <div><div></div>Manual Progress</div>					
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EXIDE PHASE 1 CLOSURE ACTIVITIES					VERNON ,CA
ID	Task Name	Duration	Start	Completion	
103	CAUSTIC TANK SUMP - DECON	1 day	Wed 6/16/21	Fri 7/30/21	<div><div>H2</div><div>2020</div><div>H1</div><div>H2</div><div>2021</div><div>H1</div><div>H2</div></div>
104	CAUSTIC TANK SUMP - REMOVAL	1 day	Thu 6/17/21	Mon 8/2/21	
105	RAILROAD SUMP - DECON	1 day	Mon 6/21/21	Tue 8/3/21	
106	RAILROAD SUMP - REMOVAL	1 day	Tue 6/22/21	Wed 8/4/21	
107	ACID COLLECTION SUMP - DECON - # 1	1 day	Wed 6/23/21	Thu 8/5/21	
108	ACID COLLECTION SUMP -REMOVAL - # 1	1 day	Thu 6/24/21	Mon 8/9/21	
109	ACID COLLECTION SUMP - DECON - # 2	1 day	Mon 6/28/21	Tue 8/10/21	
110	ACID COLLECTION SUMP -REMOVAL - # 2	1 day	Tue 6/29/21	Wed 8/11/21	
111	ACID COLLECTION SUMP - DECON - # 3	1 day	Wed 6/30/21	Thu 8/12/21	
112	ACID COLLECTION SUMP -REMOVAL - # 3	1 day	Thu 7/1/21	Fri 8/13/21	
113	ACID COLLECTION SUMP - DECON - # 4	1 day	Fri 7/2/21	Mon 8/16/21	
114	ACID COLLECTION SUMP -REMOVAL - # 4	1 day	Mon 7/5/21	Tue 8/17/21	
115	ACID COLLECTION SUMP - DECON - # 5	1 day	Tue 7/6/21	Wed 8/18/21	<div><div>UNIT 46 - PUMP SUMP - DECON</div><div>UNIT 46 -PUMP SUMP - RESUME USE</div><div>STORM WATER SYSTEM</div><div>STORM WATER SYSTEM PIPING, UNIT 46 DECON (FLUSH)</div><div>STORM WATER SYSTEM PIPING PRESURE TEST</div><div>UNIT 47 - SETTLING TANK # 1 DECON</div></div>
116	ACID COLLECTION SUMP -REMOVAL - # 5	1 day	Wed 7/7/21	Thu 8/19/21	
117	UNIT 46 - PUMP SUMP - DECON	1 day	Thu 8/5/21	Fri 9/17/21	
118	UNIT 46 -PUMP SUMP - RESUME USE	1 day	Mon 8/9/21	Mon 9/20/21	
119	STORM WATER SYSTEM	29 days	Thu 7/8/21	Wed 10/6/21	
120	STORM WATER SYSTEM PIPING, UNIT 46 DECON (FLUSH)	5 days	Thu 7/8/21	Mon 8/30/21	
121	STORM WATER SYSTEM PIPING PRESURE TEST	5 days	Fri 7/16/21	Mon 9/6/21	
122	UNIT 47 - SETTLING TANK # 1 DECON	1 day	Tue 7/27/21	Tue 9/7/21	
Unexpected circumstances out of Exide's control e.g, key contractor insolvency or discovery of heretofore unknown facility conditions, even if foreseeable in theory, will be classified as force majeure events for purposes of the 2014 Order.					<div><div>Task</div><div>Split</div><div>Milestone</div><div>Summary</div><div>Project Summary</div><div>Manual Task</div><div>Duration-only</div><div>Manual Summary Rollup</div><div>Manual Summary</div><div>Critical</div><div>Critical Split</div><div>Progress</div><div>Manual Progress</div></div>
ATTACHMENT A					<div>Page 6</div> <div>Wed 11/6/19 Exide phase 1 closure schedule attachement A 6 nov 19</div>

EXIDE PHASE 1 CLOSURE ACTIVITIES

VERNON, CA

ID	Task Name	Duration	Start	Completion												
123	UNIT 48 - SETTLING TANK # 2 DECON	2 days	Wed 7/28/21	Thu 9/9/21												
124	UNIT 49 - SETTLING TANK # 3 DECON	2 days	Fri 7/30/21	Tue 9/14/21												
125	UNIT 50 - SETTLING TANK # 4 DECON	2 days	Tue 8/3/21	Thu 9/16/21												
126	STORM WATER SURFACE IMPOUNDMENT UNIT 78 DECON	10 days	Tue 8/10/21	Wed 10/6/21												
127	EXIDE TASKS	432 days	Wed 12/4/19	Tue 11/16/21												
128	Finished Lead Bldg Floor - Inspect and Mitigate Cracks	5 days	Wed 12/25/19	Mon 6/8/20												
129	WWTP Inventory Removal (tanks)	22 days	Wed 3/24/21	Wed 10/6/21												
130	Unit 78 - Surface Impoundment Sampling	20 days	Thu 8/26/21	Mon 11/8/21												
131	Unit 46 - Drop out (pump removal, repair pit, reinstall pump)	5 days	Tue 9/28/21	Tue 11/16/21												
132	RTO Removal	10 days	Fri 12/6/19	Tue 6/29/21												
133	Rotary Kiln Bag House - Filter Removal	5 days	Mon 2/1/21	Thu 10/28/21												
134	East MAC Bag House - Filter Removal	5 days	Mon 3/23/20	Thu 10/29/20												
135	West MAC Bag House - Filter Removal	5 days	Mon 3/30/20	Thu 11/5/20												
136	North Reverb Bag House - Filter Removal	5 days	Wed 4/8/20	Thu 7/22/21												
137	South Reverb Bag House - Filter Removal	5 days	Wed 4/15/20	Fri 7/30/21												
138	Mat Bag House - Filter Removal	10 days	Thu 4/23/20	Mon 8/16/21												
139	Blast Bag House - Filter Removal	5 days	Mon 5/11/20	Wed 8/25/21												
140	Hard Bag House - Filters Removal	10 days	Mon 5/18/20	Wed 9/8/21												
141	Soft Bag House - Filters removal	10 days	Tue 1/26/21	Wed 9/8/21												
142	North Torit Bag House - Filter Removal	5 days	Wed 8/25/21	Thu 9/16/21												

Unexpected circumstances out of Exide's control e.g. key contractor insolvency or discovery of heretofore unknown facility conditions, even if foreseeable in theory, will be classified as force majeure events for purposes of the 2014 Order.

Task

Split

Milestone

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Summary

Project Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

• **Prevalence** is the proportion of the population with a disease at a particular point in time.



Critical

Critical Split

Progress

[illegible]

Manual Progress

EXIDE PHASE 1 CLOSURE ACTIVITIES					VERNON ,CA
ID	Task Name	Duration	Start	Completion	
143	South Torit Bag House - Filter Removal	5 days	Wed 9/1/21	Mon 9/27/21	
144	Unit 31 - Material Removal	1 day	Thu 5/28/20	Mon 11/1/21	
145	Unit 32 - Material Removal	1 day	Mon 6/29/20	Mon 11/1/21	
146	Remove Light Kettles	6 days	Thu 12/12/19	Mon 8/3/20	
147	South Yard -Electric Relocation	35 days	Wed 12/4/19	Tue 6/16/20	
148	North Yard - Electric Relocation	30 days	Fri 1/31/20	Mon 8/3/20	
149	North Yard Segment 2 - Sampling	20 days	Fri 2/19/21	Mon 11/1/21	
150	North Yard Segment 3 - Sampling	10 days	Mon 11/1/21	Tue 11/16/21	
151	South Yard - Sampling	15 days	Wed 9/8/21	Tue 10/19/21	
152	West Yard - Sampling	15 days	Mon 10/4/21	Thu 11/11/21	
153	Coke Tunnel - Sampling	2 days	Thu 10/28/21	Tue 11/16/21	
154	SITE WIDE FINAL DECON	26 days	Mon 11/1/21	Mon 12/13/21	
155	SITE WIDE DECON	15 days	Tue 11/16/21	Thu 12/9/21	
156	NON REGULATED ROOF DECON	8 days	Mon 11/1/21	Mon 12/13/21	
157	DECON EQUIPMENT	1 day	Thu 12/9/21	Mon 12/13/21	
158	DEMOBILIZATION	1 day	Mon 12/13/21	Tue 12/14/21	
159	MOVE OFF SITE	1 day	Mon 12/13/21	Tue 12/14/21	
160	CLOSURE REPORTS	20 days	Tue 12/14/21	Fri 1/14/22	
161	Closure Reports	20 days	Tue 12/14/21	Fri 1/14/22	
Unexpected circumstances out of Exide's control e.g, key contractor insolvency or discovery of heretofore unknown facility conditions, even if foreseeable in theory, will be classified as force majeure events for purposes of the 2014 Order.					
Task					
Split					
Milestone					
Summary					
Project Summary					
Manual Task					
Duration-only					
Manual Summary Rollup					
Manual Summary					
Critical					
Critical Split					
Progress					
Manual Progress					
ATTACHMENT A					
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Wed 11/6/19 Exide phase 1 closure schedule attachment A 6 nov 19					

Attachment B: Exide Phase 1 Closure Schedule Enforceable Milestones^{1, 2}

Milestone	Start	Finish
FEU Segment 1	NA	September 2019
FEU Segment 2	December 2019	October 2020
FEU Segment 3	February 2021	September 2021
Phase 1 Substantial Completion	NA	December 2021

¹ Compliance with each milestone is achieved when completed by the end of the month referenced above.

² Unexpected circumstances out of Exide's control, e.g., key contractor insolvency or discovery of heretofore unknown facility conditions, even if foreseeable in theory, will be classified as *force majeure* events for purposes of the 2014 Order.