

Appendix C - Transportation Plan

Department of Toxic Substances Control

Transportation Plan

Offsite Properties within the Exide Preliminary
Investigation Area

Prepared by

The Department of Toxic Substances Control
8800 Cal Center Drive
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May 24, 2018



FINAL
TRANSPORTATION PLAN FOR THE
REMOVAL ACTION (CLEANUP) PLAN
OFFSITE PROPERTIES WITHIN THE EXIDE PRELIMINARY
INVESTIGATION AREA

Prepared for



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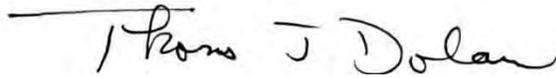


June 2017

REMOVAL ACTION PLAN (CLEANUP PLAN)
PROPERTIES WITHIN THE EXIDE PRELIMINARY INVESTIGATION AREA

On behalf of the Department of Toxic Substances Control, URS Corporation has reviewed this Removal Action Plan (Cleanup Plan) for offsite properties within the Exide Preliminary Investigation Area.

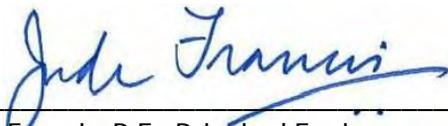
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ACRONYMS AND ABBREVIATIONS

AL	Action Level
Cal-EPA	California Environmental Protection Agency
CCR	California Code of Regulations
CFR	Code of Federal Regulations
COC	chain-of-custody
CDPH	State of California Health and Human Services Agency Department of Public Health
DL	detection limit
DTSC	Department of Toxic Substances Control
ELAP	Environmental Laboratory Accreditation Program
EPA	Environmental Protection Agency
ft	feet
ft ²	square feet
HASP	Health and Safety Plan
HUD	Department of Housing and Urban Development
IMWP	Interim Measures Work plan
LAC	Los Angeles County
LBP	lead-based paint
mg/kg	milligrams per kilogram
mg/cm ²	milligrams per square centimeter
NIST	National Institute of Standards and Technology
OEHHA	Office of Environmental Health Hazard Assessment
OSHA	Occupational Safety and Health Administration
PIA	Preliminary Investigation Area
POC	point of contact
QA/QC	Quality Assurance/Quality Control
SI	Site Investigation
SOW	scope of work
SCAQMD	South Coast Air Quality Management District
USA	Underground Services Alert
XRF	X-ray fluorescence

1.0 INTRODUCTION AND BACKGROUND

This document is the Transportation Plan for the Removal Action Cleanup Plan (Cleanup Plan) for Off-Site Properties within the Exide Preliminary Investigation Area (PIA). It is based, in part, on the Draft Transportation Plan for the Exide Off-Site Interim Remedial Measures Work Plan (Parsons, November 2015) and a subsequent revision to that document (URS, October 2016). The Cleanup is being undertaken by the State of California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC) for the remediation of lead-impacted properties located in the area around the former Exide Facility, in Vernon, California.

The DTSC has developed site-specific guidance to aid in preparation of the Cleanup Plan (URS, December 15, 2016) that describes the work efforts for conducting soil removal at sensitive land use properties within the PIA. The methods presented in the Cleanup Plan provide the remediation team with the approach for the successful implementation of remedial activities within affected areas.

1.1 PURPOSE AND OBJECTIVES

This document outlines the approach for the transportation and offsite disposal of materials from remediated properties within the PIA to the appropriate disposal facility from the remediation activities. The objective of this Transportation Plan is to minimize potential impacts to the surrounding community and/or the environment during the remediation, transportation and disposal of impacted materials during the remediation.

1.2 SUMMARY OF REMOVAL ACTION

The selected removal activities consist of excavation, loading, transport and disposal of materials from properties impacted with lead in the vicinity of the former Exide Facility. After the removal action, each property will be restored by the remediation contractor (contractor) in accordance with the Cleanup Plan (2017).

The average property will generate approximately 67 cubic yards of soil and other debris for disposal at the La Paz County Landfill in Parker, Arizona, South Yuma County Landfill in Yuma, Arizona, the Waste Management Kettleman Hills Facility in Kettleman City, California, the Chiquita Canyon Landfill in Los Angeles County, California or the Simi Valley Landfill in Ventura County, California. Each removal action will include, but may not be limited to, the following tasks, additional details of which are provided in the Cleanup Plan:

- PRE-EXCAVATION ACTIVITIES
 - Permits, Documentation, and Notifications
 - Utilities
 - Site preparation and control measures
 - Site Security and Control

- Public Participation
- EXCAVATION ACTIVITIES
 - Excavation Limits
 - Site Clearing and Debris Removal
 - Equipment
 - Shoring and Setbacks
 - Excavation Procedures and Progression
 - Surveying Activities
- DUST CONTROL
 - Dust Suppression Techniques
- AIR MONITORING
 - Real-Time Particulate Monitors
 - Personal Air Monitors
- EROSION AND RUNOFF CONTROL
- CONFIRMATION SAMPLING
- WASTE MANAGEMENT
 - Clearing and Debris Removal
 - Soil management, Stockpiling and profiling
 - Load Checking
 - Transportation
- BACKFILL AND RESTORATION
 - Borrow Source evaluation
 - Site Restoration Activities

1.3 REMEDIAL GOALS

The soil cleanup criterion is outlined in the Cleanup Plan (2017) for all properties where cleanup action occurs. Soil removal will extend to the depth interval where the post-removal risk evaluation indicates a 95% upper confidence limit (UCL) of 80 mg/kg or to a maximum depth of 18 inches. Properties with residual concentrations of lead above the representative soil lead concentration of 80 mg/kg at 18 inches will require further evaluation on a case-by-case basis.

2.0 OFFSITE TRANSPORTATION

This section presents measures and information that will minimize the potential health, safety, and environmental risks associated with the offsite transport of material generated during remediation. These include:

- Characteristics of material to be transported
- Destination of waste material
- Decontamination methods
- Mode of Transportation
- Route of Transport
- Traffic control and loading procedures
- Recordkeeping

Health and safety and contingency/spill response planning are provided in subsequent sections to this section.

2.1 CHARACTERISTICS OF MATERIAL TO BE TRANSPORTED

Up to approximately 67 cubic yards of lead-impacted soil and debris per property will be generated during remediation. Depending on the material profile from each property, the soil requiring offsite disposal may include a combination of:

- RCRA-regulated, hazardous lead-impacted soil
- Non-RCRA hazardous waste lead-impacted soil (i.e., California hazardous)
- Soil impacted with total extractable metals above remedial goals but below hazardous waste disposal criteria

DTSC estimates that over 95% of the properties sampled in the PIA will contain lead-impacted soils which exceed the target cleanup goal of 80 mg/kg.

2.2 DESTINATION OF WASTE MATERIAL

Up to approximately 67 cubic yards of soil and debris per property will be removed and disposed of at one or more of the landfills listed below.

The removal activities at the properties will consist of removal of vegetation and soils in the top 18" (maximum), and restoration with clean soil, top soil, and ground cover. The decontamination will consist of the following:

- 1) All small vegetation in contact with impacted soil will be removed. All asphalt and concrete will be left in-place. Upon completion of excavation activities, any debris and soils will be placed in covered container for proper disposal.

- 2) Trees and shrubs over 4 feet in height will be protected in place and the top 6" of soil around the roots of the trees will be hand excavated. This soil will be placed with other impacted materials scheduled for off-site transport and disposal. Excavated soil at each of the properties may consist of the following:
- Non-hazardous soil that may be disposed of at a Class III local landfill (Chiquita Canyon Landfill, Simi Valley Landfill) or at La Paz Landfill or South Yuma Landfill. This category is expected to comprise the majority of the soils for transport and disposal. However, profiling of excavated soils in situ will determine the actual nature and class of the material for disposal purposes.
 - Non-RCRA hazardous soil that will be transported to La Paz Landfill, South Yuma Landfill, or to the Kettleman Hills Facility. This category is expected to comprise less than the majority of the soils for transport and disposal.
 - RCRA hazardous soil that will be disposed of at the Waste Management Kettleman Hills Facility. Such soil is expected to comprise a minor part of the transportation and disposal effort.
- 3) It is anticipated that up to 7 truckloads of hazardous and impacted materials will be removed at each property. Most material is targeted for direct excavation and loading in to bins/truck, but, temporary stockpiling and storage of material under controlled conditions may become necessary based on the circumstances of individual property cleanup.

Contact information for Landfills

La Paz Landfill

26999 Hwy 95, Mile Post 128
Parker, AZ 85344
(928) 916-1253

Waste Management Kettleman Hills Facility

35251 Skyline Road
Kettleman City, CA 93239
(559) 309-7688

Waste Management Simi Valley

2801 Madera Road
Simi Valley, CA 93065
(805) 579-7267
(559) 834-9151: Special Disposal Unit

Chiquita Canyon Sanitary Landfill

29201 Henry Mayo Dr
Castaic, CA 91384
(661) 257-3655
(661) 388-3013 - Sales

South Yuma County Landfill

19536 South Avenue 1 E

Yuma, AZ 85365

(928) 341-9300

(619) 520-4429 - Sales

2.3 DECONTAMINATION METHODS

In order to prevent transfer of contamination off-site or residual contamination from being left on a property by construction equipment and personnel, decontamination procedures will be developed in the Project Health and Safety Plan prepared for this removal action. These procedures are summarized below:

- Prior to loading excavated materials into trucks, plastic sheeting will be placed on the ground or asphalt such that any spilled material will be prevented from contacting the ground surface. Upon completion of loading, any debris will be placed in the appropriate container for proper disposal and the plastic sheeting will be folded and disposed.
- All equipment wheels/tires will be cleaned over plastic sheeting by means of shovels and stiff-bristled brooms or brushes until they are fully cleaned. Upon completion of cleaning, any debris will be placed in the appropriate container for proper disposal and the plastic sheeting will be folded and disposed.
- Personal Protective Equipment, such as disposable protective gear, if used, will be removed and discarded in the contamination reduction zone (decontamination zone). In order to decontaminate reusable items such as work boots, a two-stage decontamination process will be used. This process will include washing in a detergent solution with a stiff-bristled brush and rinsing with clean water. The rinsate water will be distributed over contaminated soil (to be exported) for dust control purposes.

The decontamination containers will be clearly marked, identifying the first (wash) and subsequent, second (rinse) and third (final rinse) containers to be used. Rinse water will be applied to materials that will be off-loaded for disposal only and will not be applied to any of the open excavations to avoid potential cross-contamination.

Transportation equipment will be decontaminated before leaving the each property. An equipment decontamination area will be established to support the soil remediation. The equipment decontamination area will be used to rinse adhering soil and dust from heavy equipment before leaving the each property. All rinsate from the equipment decontamination will be self-contained within the decontamination area and will not be discharged onto unimpacted areas. The rinsate from the equipment decontamination area will be characterized for proper handling. Water may be used for dust suppression in remediation areas. Entrance/exit pathways will be routinely inspected and cleaned with a mechanical broom sweeper to remove visibly accumulated dust and sediment.

2.4 MODE OF TRANSPORTATION

All materials transported from individual properties in the PIA to an in-State Class I, Class II or Class III disposal facility will be transported by 18-cubic-yard (23-ton) end-dump trucks or other trucks. Trucks will be covered with a well-secured tarp, and the transporters will possess a valid hazardous waste transporter license. All transport vehicles will be inspected prior to use to ensure that each vehicle is safe for highway travel. In addition, after loading the trucks will be inspected to ensure that they are properly tarped and the appropriate Department of Transportation placard is on the vehicle before leaving each property.

All hazardous materials will be transported from the PIA by a registered hazardous waste transporter. The contact information for transporters will be provided through the contractor.

2.5 ROUTE OF TRANSPORT

Materials transported by truck to an in-state Class I, Class II, or Class III disposal facility will travel over public roads and highways in the greater Los Angeles Region of California. As previously mentioned, non-hazardous materials will be transported to a Class III local landfill (Chiquita Canyon Landfill in Castaic, CA or Simi Valley Landfill in Simi Valley, CA). All hazardous materials will be transported to the Waste Management Kettleman Hills Facility in Kettleman City, CA. All non-RCRA hazardous materials will be transported to either Waste Management Kettleman Hills Facility in Kettleman City, CA, to La, to La Paz, Arizona, or to South Yuma, Arizona, based on availability and logistics. The routes that the trucks travel over will be partly residential, due to the nature of the properties that will be cleaned up. Traffic routes will be designed to follow designated truck routes to the extent feasible (Figure 1-2) in order to limit impacts to residences in the various jurisdictions where remediation is to take place. These are Maywood, Boyle Heights, East Los Angeles (unincorporated Los Angeles County), City of Commerce, Bell, Vernon and Huntington Park. Truck routes will be designed to minimize the volume of trucks that pass sensitive areas, such as schools and hospitals. Because of the large number of addresses, each property or cluster of properties will have a different route to the disposal facility. The following are the directions to each of disposal facilities from a point within the PIA. Due to the size of the PIA, it is recognized that some routes will begin at freeway entrances on I-5 or SR-60 instead of I-710.

Directions to the Waste Management Kettleman Hills Facility

Enter I-710 (North)

Enter I-5 (North) toward Sacramento

Exit I-5 at CA 41 West

Take CA 41 West to Skyline Road

Turn right (North) on Skyline Road

Arrive at destination (35251 Skyline Road, Kettleman City, CA 93239)

Directions to the La Paz Landfill

Enter I-710 (North)

Follow I-10 E to CA 177 N in Riverside County. Take exit 192 from I-10 E
Continue onto CA 62 E
Continue onto S. California Ave

Directions to the South Yuma Landfill Facility

Enter 1-710 (North) to CA-60 East
Follow CA-60 E to I-10 East
I-10E to CA-86 South
CA-86 S to CA-78 East
CA-78 E to CA-111 South
CA-111 S to 1-8 East
I-8 E to Avenue 3 E South
Avenue 3 E S to E County 19 Street West
E County 17 Street W to Avenue 1 E South
Arrive at South Yuma Landfill (destination on right)

Directions to Chiquita Canyon Landfill in northwestern Los Angeles County

Enter I-710 (North) to I-5 North
Follow I-5 North to CA 126 West
Follow CA 126 West for 2.9 miles
Turn right arrive at Chiquita Canyon Landfill

Directions to Simi Valley Landfill in eastern Ventura County

Enter I-710 (North) to I-5 North
Follow I-5 North to CA 118 West
Exit CA 118 West at Madera Road S
Turn left onto View Land Drive

The one-way trip from the PIA to the Waste Management Kettleman Hills Facility is estimated to take approximately 3 hours (Figure 2). The one-way trip from the PIA to the La Paz Landfill is estimated to take approximately 4.5 hours (Figure 3). The one-way trip from the PIA to the South Yuma Landfill Facility is estimated to take 5 hours (Figure 4). Specific travel times and routing may vary depending on weather, traffic conditions and other factors. It is expected that these routes will allow each vehicle to make at least one trip per day.

The one-way trip from the PIA to the Chiquita and Simi Valley Landfills is estimated to take approximately 1.5 hours (Figure 5 and 6). It is expected that this route will allow each vehicle to make one trip to and from the PIA.

2.6 TRAFFIC CONTROL AND LOADING PROCEDURES

Trucks will park in the street adjacent to each property as it is cleaned up and soil may be put into sacks and/or be loaded directly onto the transport trucks. If allowed by local jurisdictions, trucks may be parked on-street overnight to minimize trips. No other off-site staging of trucks is anticipated for this remedial effort. Stockpiling of materials may occur on each individual property until sufficient quantity is available for export.

After loading is complete, the trucks will be tarped, cleaned of any loose debris and inspected for the appropriate placarding. It is anticipated that trucks will follow approved routes and will not travel over routes that have been specifically excluded (if any) by local jurisdictions. DTSC's cleanup contractor will develop a Traffic Management Plan (TMP) that will be submitted to each of the local jurisdictions within the PIA to assure concurrence with the selection of routes to access individual properties and planned work hours and days. Flag men will be used as required by cities as part of the TMP. Before leaving each property the appropriate manifests will be completed.

In accordance with PDF Trans-1 of the EIR the Traffic Management Plan shall include mechanisms to provide regularly updated information as needed. Develop a temporary traffic control plan that includes elements such as the following:

- All transport vehicles used for offsite transport of soils shall use strapped-down covers to prevent materials from leaving the truck during transport.
- Identify designated truck routes in each jurisdiction and direct truck traffic to those routes;
- Identify all bike paths and all transit facilities, such as bus stops, where cleanup activities are anticipated and request that local jurisdictions properly sign the temporary detour of a bikeway and that affected transit providers use their normal methods to inform system users of possible temporary stop relocation;
- Identify streets where vehicles over a specified weight are prohibited, other than for direct, local access;
- Identify travel time restrictions for cleanup traffic, including trucks, to avoid peak travel periods;
- Provide flagmen to temporarily control pedestrian and vehicular traffic adjacent to properties during departure and arrival of trucks, and during periods of equipment movement;
- Install protective devices and traffic controls (such as barricades, cones, lights, warning beacons, warning signs) along sidewalks at individual properties during cleanup or during any crossing into the public right of way;
- Provide protective barriers on a property's perimeter where excavation will extend to the sidewalk;
- Provide signage directing pedestrians to alternate access in locations where cleanup activities extend into the sidewalk;

- Schedule truck deliveries so that deliveries are consolidated at individual properties to the extent feasible;
- Leave equipment on-site overnight to the extent feasible;
- Actively promote carpooling and transit use among workers;
- Consolidate staging areas for equipment to the maximum extent feasible; and
- Consolidate parking areas for workers and provide transportation to and from worksites (if beyond walking distance).

In accordance with PDF Trans-2 of the EIR coordinate routes and times with local jurisdictions to avoid use of routes affected by local streets or infrastructure maintenance or expansion projects.

In accordance with PDF Trans-3 of the EIR coordinate with school authorities and operators of daycares to schedule cleanup of these properties, if necessary, during times when students/children are not present, such as scheduled breaks, and to inform them of planned cleanup of properties in the immediate vicinity of these uses when they are in session.

The transporters will be registered hazardous waste transporters and will be appropriately trained and experienced drivers. The majority of transport trucks will leave the PIA between the hours of 9:00 a.m. and 3:30 p.m. No lane closures are anticipated.

It is anticipated that lead-impacted soil will be transported to a permitted disposal facility as non-hazardous, non-RCRA hazardous or RCRA hazardous waste. All transportation activities will be performed in strict compliance with all regulations and ordinances.

Statutory requirements governing hazardous waste transportation in California are contained in Division 20, Chapter 6.5, Article 6.5, Article 6.6, and Article 13 of the California Health and Safety Code (Health & Saf. Code). Regulations adopted pursuant to these statutes are found in, Division 4.5, Chapter 13, and Chapter 29 of the California Code of Regulations, title 22. (Cal. Code Regs., tit. 22). Hazardous waste transporters must comply with the California Vehicle Code, CHP Regulations (Cal. Code Regs., tit. 13); the California State Fire Marshal Regulations (Cal. Code Regs., tit. 19); United States Department of Transportation (DOT) Hazardous Waste Transporter Requirements Regulations, Title 49, Code of Federal Regulations (49 Code of Federal Regulations); and U.S. Environmental Protection Agency (U.S. EPA) Regulations, Title 40 Code of Federal Regulations. In addition, hazardous waste transporters must comply with the Health & Safety Code and Cal. Code Regs., tit. 22 which are administered by DTSC.

Transportation equipment will be chosen to safely transport the expected volumes of soil, taking into consideration the types of roads to be traveled and their loading capacity. Routine truck maintenance and repairs will be performed at the contractor's premises prior to picking up waste materials from each property within the PIA. The contractor will be required to cleanup, to the satisfaction of DTSC, any spills resulting from maintenance of the trucks or due to road accidents during the operation of this project. Trucks used to transport materials to and from the PIA will be inspected by the remediation oversight contractor, its subcontractors and DTSC to

ensure that the placarding is done in compliance with local, state, and federal requirements.

Trucks used for transportation of contaminated soil and debris will remain on clean areas, to the extent possible, to minimize the need to decontaminate the truck tires. During loading, dust and odor emissions will be monitored and mitigated as necessary. The transporting trucks will be equipped to fully cover all soil and debris during transportation. At a minimum, the soil and debris will be tightly covered by a heavy tarp.

2.7 RECORDKEEPING

For soil transported to a Class I or Class II disposal facility, the driver will carry a Hazardous Waste Manifest to the disposal facility. DTSC's contractor will also maintain copies of manifests as well as a log listing the date and time of truck loading, type of material, weight of load, and vehicle identification for each load of material transported by truck. Drivers will operate their vehicles and respond to emergencies in accordance with the registered waste transporter's Transportation Safety Plan and /or the attached spill response plan (Attachment A).

For soil transported to a Class III disposal facility, the driver will carry a Non-Hazardous Waste Manifest or Bill of Lading to the disposal facility. DTSC's contractor will maintain copies of the manifests/bills of lading as well as a log listing the date and time of truck loading, type of material, weight of load, and vehicle identification for each load of material transported. Drivers will operate their vehicles and respond to emergencies in accordance with the registered waste transporter's Transportation Safety Plan and/or the attached spill response plan.

3.0 HEALTH AND SAFETY

The Project Health and Safety Plan being utilized for this project is presented in Appendix E of the RAP (URS, 2016). The Health and Safety Plan will be used to establish minimum on- and off-site safety requirements, policies and procedures adequate to protect workers, the public, and the environment from the predicted hazards. All cleanup contractors and subcontractors involved in removal, transport, and handling of impacted material will be required to abide by these minimum requirements and to develop site-specific subcontractor safety plans to address potential hazards associated with these tasks. As indicated in the Health and Safety Plan, in the event that unanticipated conditions occur at individual properties, the plan will be modified accordingly.

Level D will be required for project activities unless health and safety monitoring shows otherwise. Then engineering controls or personal protective equipment may be necessary to protect workers, residences and the surrounding community.

During soil removal and any intrusive work, air monitoring will initially be conducted to establish background levels. Once remedial or intrusive activities begin, monitoring will continue daily during work hours as detailed in the Cleanup Plan (URS, 2017).

Personnel at individual properties within the PIA will have access to respirators with the appropriate cartridges for dust. Cartridges will be P-100 type cartridges as required by OSHA. Note that respiratory protection will only be implemented after engineering controls have proven ineffective in reducing the potential risk to life and health. These measures can include additional water spray, plastic sheeting, etc.

4.0 CONTINGENCY/SPILL RESPONSE PLAN

In the event of a spill, the contractor will be prepared to respond in a safe and efficient manner, specific to the particular spill situation. Procedures established in the Spill Response Plan (Attachment A) will be used for handling of spills, whether they are on-site spills or spills occurring during transportation. The Spill Response Plan in Attachment A addresses handling of on-site spills. Because safety and protection of the public and the environment are of major concern, the first consideration is that of public safety and environmental protection. The provisions of the Spill Response Plan will be strictly adhered to, in order to ensure continued protection of the public safety and the environment.

Table 1 provides a listing of the local, state and federal environmental health agencies and emergency response agencies along the transportation haul routes.

For contaminated material spilled onto the ground surface along a transportation route, cleanup would probably consist of sweeping the contaminated soil for transportation to a disposal facility. All cleanup work will be done in accordance with the Project Health and Safety Plan and in cooperation with interested state and local agencies. For accidental releases of contaminated material in or near a stream, river, or lake, the same general response procedures will apply, with particular emphasis on preventing the release of the spilled waste material into the water body. In the event of an actual release of contaminated material into a body of water, all work will be coordinated with state and local agencies to select practical and appropriate cleanup methods based on specific circumstances of the release.

5.0 REFERENCES

Parsons, Draft Transportation Plan Exide *Offsite Interim Remedial Measure*, November 2015, revised by URS October 2016.

URS, *Draft Remedial Action (Cleanup) Plan, Offsite Properties within the Exide Preliminary Investigation Area (RAP)*, December 15, 2016.

ESA PCR , *Draft Environmental Impact Report for the Draft Remedial Action (Cleanup) Plan, Offsite Properties within the Exide Preliminary Investigation Area*, December 2016.

TABLE

Table 1
Environmental Health Agencies and Emergency Response Agencies for
Truck Transportation

To: Landfills in Arizona

*From: Various Sites Located in the Preliminary Investigation Area surrounding the Former
Exide Facility, Vernon, California*

National

National Response Center: (800) 424 - 8802

State of California

California Emergency
Management Agency: (800) 852 - 7550 (within California)
(916) 845 - 8911 (outside California)

California Counties

Los Angeles County Environmental Health
(888) 700-9995

San Bernardino County Environmental Health Services
(760) 243-8141

Riverside County Environmental Health Services
(951) 358-5316

State of Arizona

Arizona Department of Environmental Quality
(602) 771-2330 or (800) 234-5677

Arizona Counties

La Paz County Environmental Health Department
(928) 669-1100

Yuma County Environmental Health Services Division
(928) 317-4584

Local Emergency

Fire, Police, and Ambulance 911

Table 1 (Cont'd)
Environmental Health Agencies and Emergency Response Agencies for
Truck Transportation

To: Landfills in California

*From: Various Sites Located in the Preliminary Investigation Area surrounding the Former
Exide Facility, Vernon, California*

National

National Response Center: (800) 424 - 8802

State of California

California Emergency
Management Agency: (800) 852 - 7550 (within California)
(916) 845 - 8911 (outside California)

California Counties

Los Angeles County Environmental Health
(888)700-9995

Kern County Environmental Health Division
(661) 862-8740

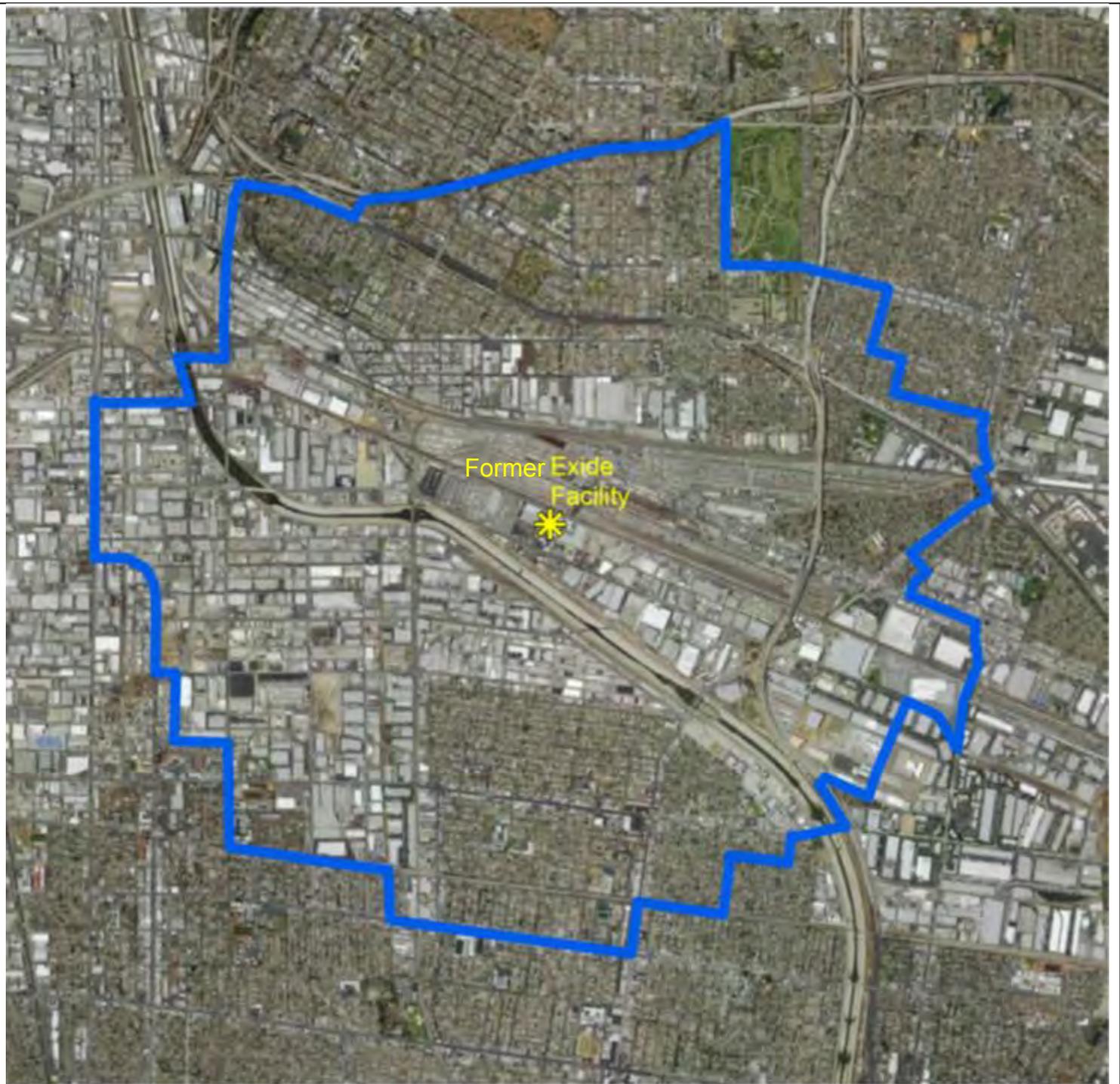
Kings County Environmental Health Services
(559) -584-1411

Ventura County Environmental Health Division
(805) 654-2813

Local Emergency

Fire, Police, and Ambulance 911

FIGURES



-  Exide Facility
-  Primary Investigation Area

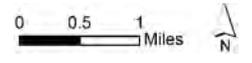
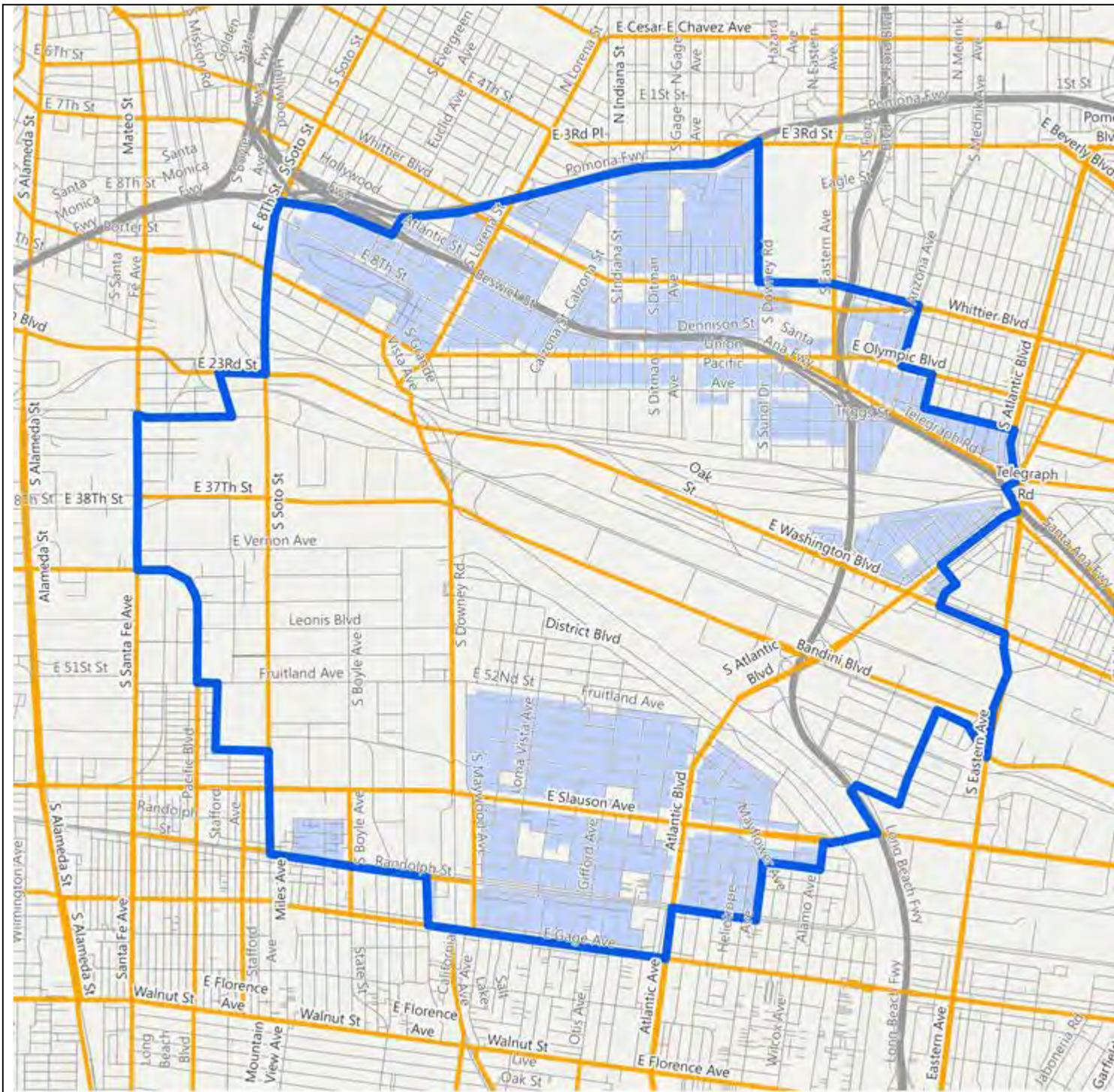


FIGURE 1-1
Exide Off-Site Primary Investigation Area



- PIA
- Truck Routes
- Primary Residential Areas

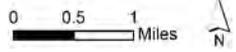
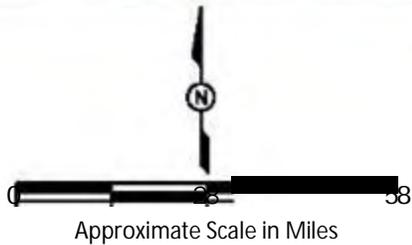
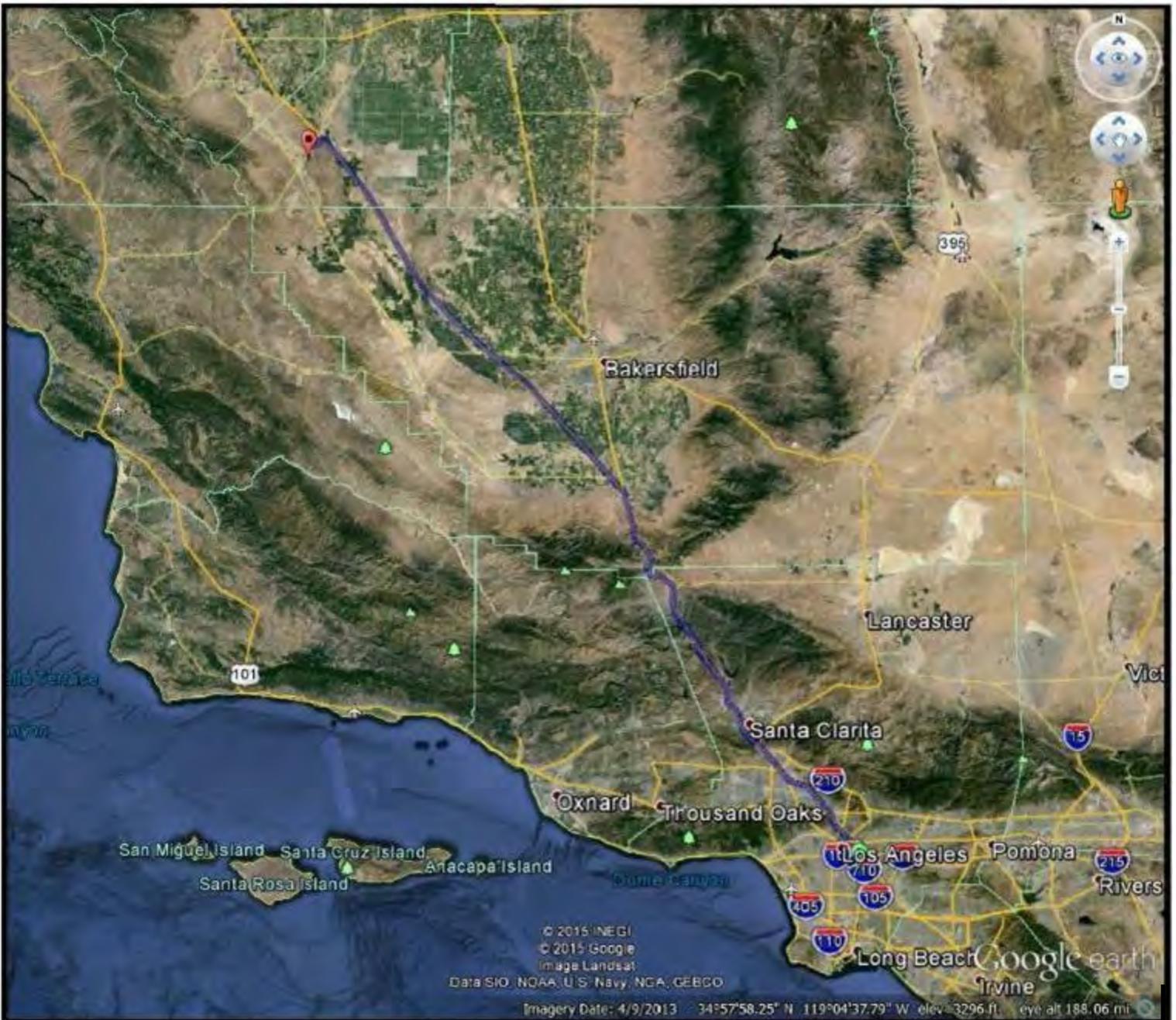


FIGURE 1-2
Truck Routes in Vicinity of Exide Off-Site Primary Investigation Area



WM Kettleman Hills Facility

1. Enter the I-5 North
2. Follow the I-5 North to CA- 41 South
3. Continue onto CA-41 South
4. Turn left onto Skyline Road
5. Turn right onto Old State Highway
6. Arrive at WM Kettleman Hills Facility

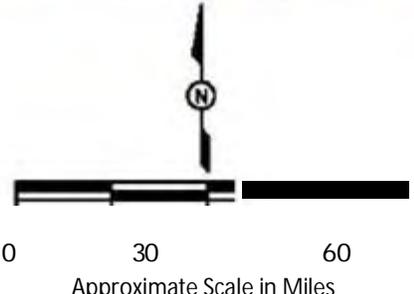
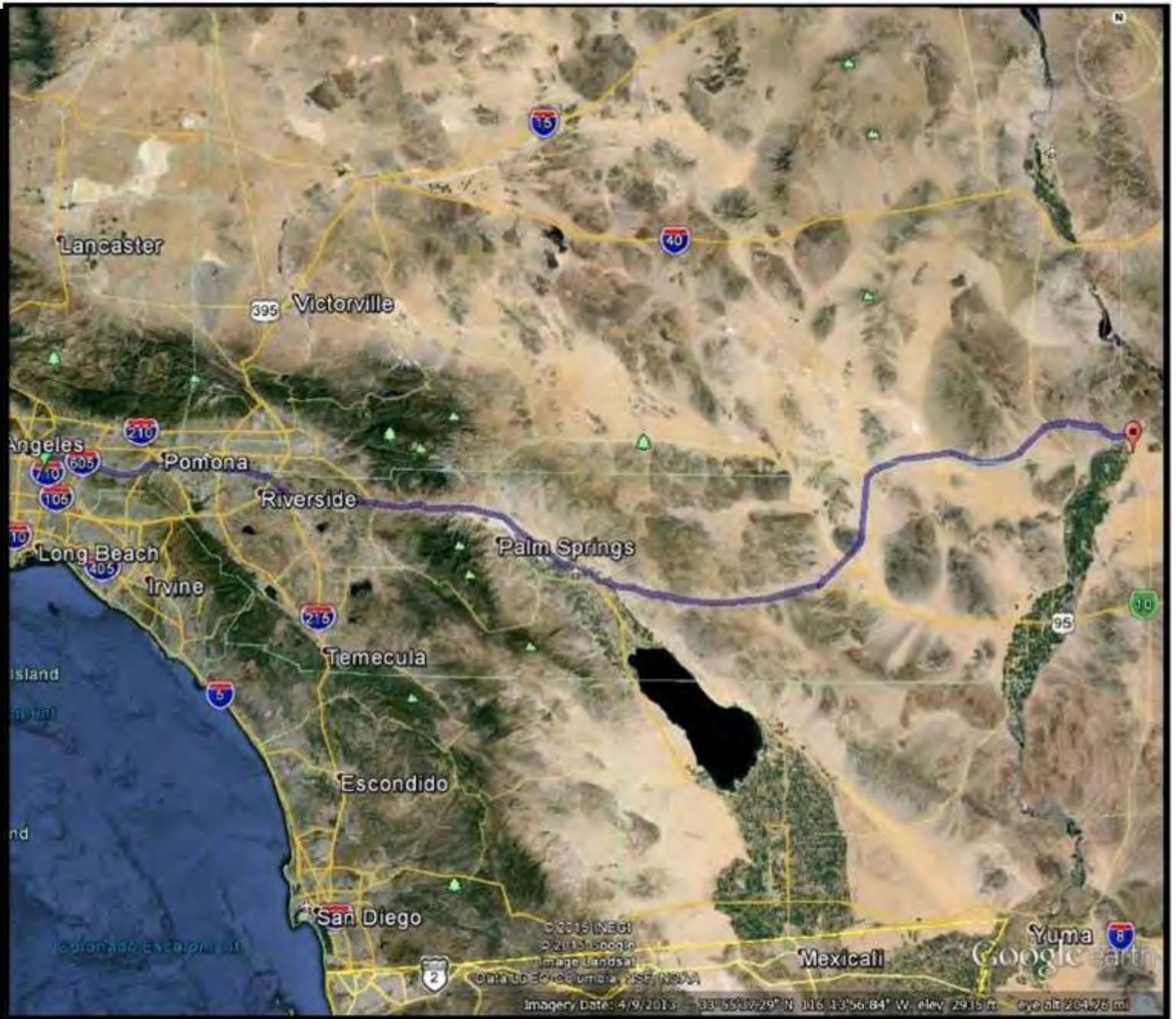
Truck Route Map - Directions to the
 WM Kettleman Hills Facility

CLIENT: Department of Toxic Substances Control

LOCATION: Former Exide Technologies Offsite Areas

Figure

2



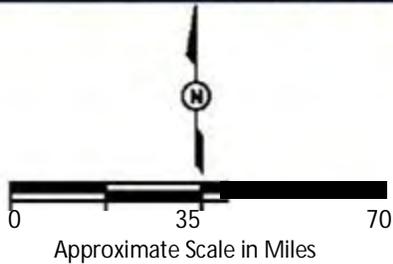
TruckRouteMap-Directionstothe LaPaz Landfill

CLIENT:
Department of Toxic Substances Control

LOCATION:
Former Exide Technologies Offsite Areas

LA PAZ LANDFILL FACILITY

1. Enter 1-710 (North) to 1-10 East
2. Follow 1-10 E to CA-177 North
3. CA-177 onto CA-62 East
4. Continue onto CA-62 E
5. Continue onto S. California
6. Arrive at Landfill Road and S. California



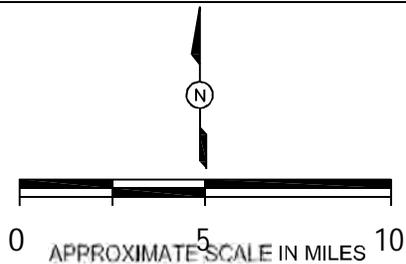
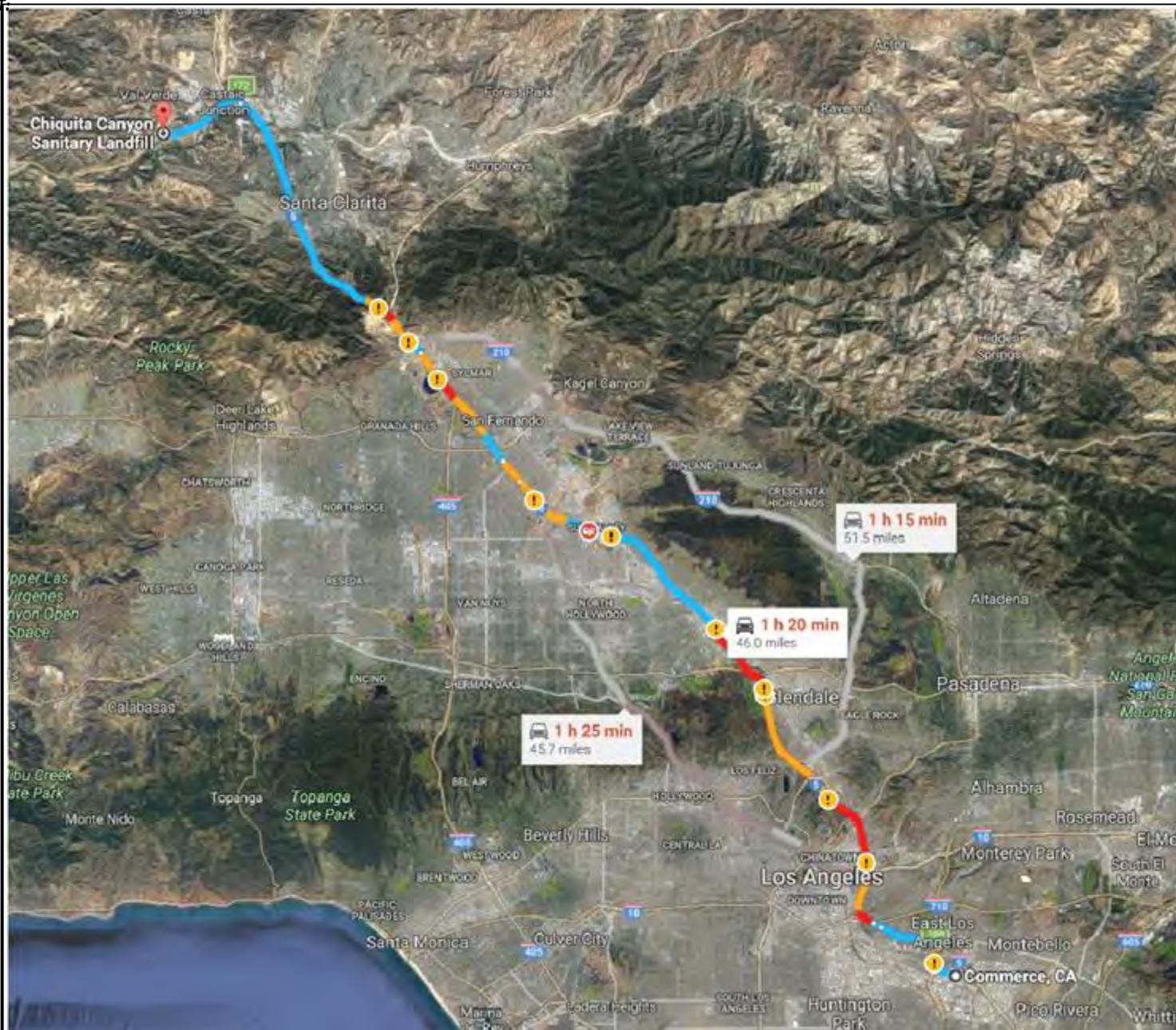
SOUTH YUMA LANDFILL FACILITY

1. Enter I-710 (South) to CA-60 East
 2. Follow CA-60 E to I-10 East
 3. I-10 E to CA 86 South
 4. CA-86 to CA-78 East
 5. CA-78 E to CA-111 South
 6. CA-111 S to I-8 East
 7. I-8 East to Avenue 3 E South
 8. Avenue 3 E S to E County 19 Street West
 9. E County 17 Street W to Avenue 1 E South
- Arrive at South Yuma Landfill

Truck Route Map - Directions to the South Yuma Landfill

CLIENT:
Department of Toxic Substances Control

LOCATION:
Fonner Exide Technologies Offsite Areas



CHIQUITA CANYON LANDFILL

1. Enter I-710 (North) to I-5 North
2. Follow I-5 North to CA 126 West
3. Follow CA 126 West for 2.9 miles
4. Turn right arrive at Chiquita Canyon Landfill

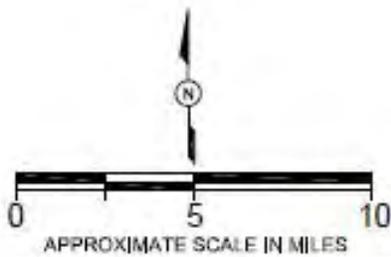
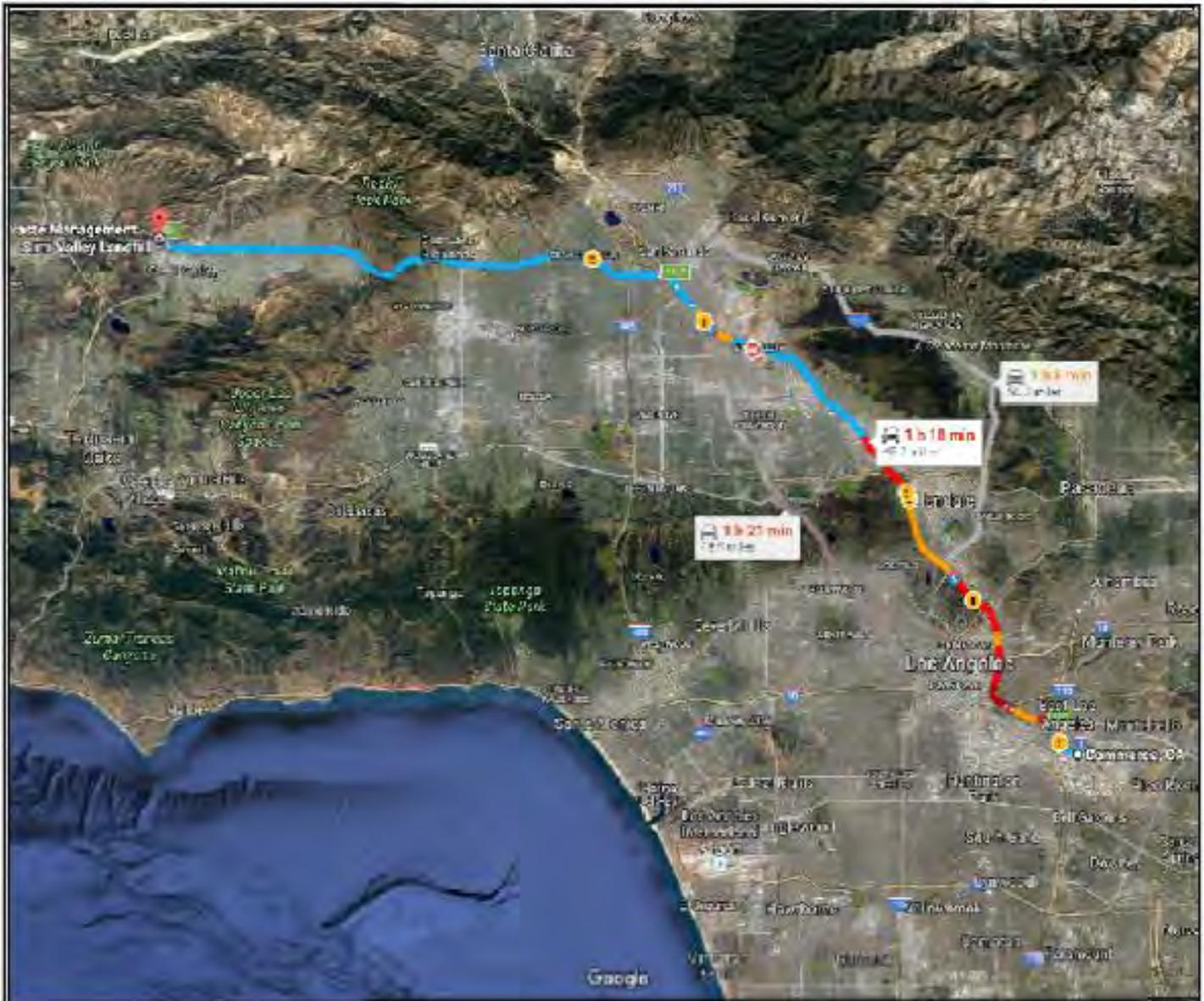
Truck Route Map - Directions to the Chiquita Canyon Landfill

Department of Toxic Substances Control

Technologies Offsite Areas

FIGURE:

5



SIMI VALLEY LANDFILL

1. Enter I-710 (North) to I-5 North
2. Follow I-5 North to CA 118 West
3. Exit CA 118 West at Madera Road S
4. Turn left onto View Land Drive

Truck Route Map - Directions to the Simi Valley Landfill

CLIENT: Department of Toxic Substances Control

LOCATION: Former Exide Technologies Offsite Areas

FIGURE:

6

ATTACHMENT A
SPILL RESPONSE AND CONTINGENCY PLAN

SPILL RESPONSE AND CONTINGENCY PLAN

This Plan outlines procedures that will be followed in the event of a spill and/or releases, including spill control, containment, and clean-up of releases of hazardous materials and substances. All personnel handling hazardous waste on-site will have the appropriate OSHA Hazardous Waste training and medical clearance as outlined in the Site Specific Health and Safety Plan.

PROCEDURES FOR SPILL CONTROL/CLEAN-UP AND CONTAINMENT OF RELEASES OF HAZARDOUS SUBSTANCES OR MATERIALS

In the event of a spill or accidental release, the appropriate measures will be taken to confine the spill to the immediate area, and to prevent any migration off-site. Figure 1 provides a general outline for spill response. The following steps will be taken when discovering or encountering chemical release or spills:

- Evacuate the spill area and the site to ensure the safety of all personnel.
- Contain and/or clean up the release/spill. For large spills within the City of Los Angeles, contact the Los Angeles Fire Department (LAFD); or Los Angeles County Fire Department (LACFD) for areas outside the City of Los Angeles.
- Notify responsible project personnel, including the Cleanup Contractor's and DTSC's Project Managers (PMs), and affected agencies.
- Complete Spill Data Worksheet and Cleanup Contractor's Incident Report Form.

Because removal measures are to take place in various cities, the appropriate Fire Department responsible for each individual residence cannot be identified in the plan. The appropriate Fire Department will be identified along with other pertinent information such as the lead analyses results, areas requiring excavation, and transportation routes in the work plan amendment for each property. Spill or releases requiring the LAFD or LACFD are not anticipated during remediation activities. However, if the spill cannot be contained by the contractor with on-site resources, then the Site Health and Safety Officer (SHSO) will notify the appropriate LAFD or LACFD immediately. The SHSO will verify with the LAFD or LACFD the relevant on-site information. The cleanup contractor's PM will contact the appropriate project emergency response personnel, including DTSC and agency personnel. The SHSO will have the responsibility of:

- Contacting the cleanup contractor PM;
- Confirming spill information;
- Identifying necessary spill response personnel and resources;
- Obtaining all necessary MSDSs; and
- Completing the Spill Data Worksheet and Contractor's Incident Report Form.

1.1.1 On-Site Spills

For on-site spills, it is imperative that the spill be confined to the site, and to prevent migration off-site. Spills will be cleaned up immediately using available on-site resources if it is safe to do so. Particular attention will be made to storm sewer locations and other drainage sites. Absorbent material, including booms, absorbent pads, and tools will be used to clean-up small spills. Larger spills of any oil or oil product spill, will be contained and/or recovered using mechanical skimmers, sorbants (booms, pads, sweeps, rolls, pillows) and adsorbents (pom-pom) or collected by vacuum trucks.

Table 1 provides a general initial response actions in the event of a discovery of an on-site spill. Once the spill is contained, any contaminated material, including disposable spill equipment (booms, socks, etc.) will be packaged and properly disposed.

1.2 CONTAMINATED/HAZARDOUS SOIL/WATER RELEASES

Trucks transporting contaminated soils and/or may be involved in an accident on roads and public and private properties potentially expose the public to contaminated soils/water. In the event of an accident, the operator of the truck will notify the CHP and other emergency response agencies, and Cleanup Contractor's PM. The Cleanup Contractor's PM will notify DTSC PM and appropriate environmental agencies.

1.3 RUPTURE OF PIPELINES

Undocumented gas, oil, and other utility lines may be ruptured/broken during trenching, excavation, and other remedial activities, resulting in emergency response situations. The Cleanup Contractor will provide hazardous waste response services to mitigate the situation.

1.4 UNDERGROUND STORAGE TANKS

Underground storage tanks (USTs) or cisterns may be found during excavation, and other remedial activities. If an undocumented UST is encountered, appropriate project personnel, including DTSC personnel will be notified. USTs will be removed by the Remediation Contractor in accordance with regulatory requirements upon receipt of approval from DTSC PM and agency notification. The following activities will occur upon the encounter of a UST:

- On-site personnel will immediately stop work and notify cleanup contractor's PM;
- Cleanup contractor's PM will notify DTSC's PM and any required regulatory agencies; If removal is required, cleanup contractor's PM will notify the lead regulatory agency (contact the Los Angeles County Environmental Health Department (EHD)). A representative from the Los Angeles County EHD will inspect the site. The cleanup contractor's PM will do the following:

- Contact the EHD (**888-700-9995**) and give them the site address so they can determine if the site is registered with the Los Angeles County EHD. ,
- Complete the UST Closure Authorization Form (<http://www.ladpw.org/general/forms/download/268.pdf>) and pay the fee to obtain UST removal permit, at this time, EHD will provide a list of agencies which they need to contact, such as the local fire department; and
- Call the EHD field inspector to schedule UST removal (must be notified at least 48 hours prior to scheduled removal). For UST removal, the Los Angeles County EHD will be involved.
- The cleanup contractor's PM and the DTSC PM, and the inspector from the leading regulatory agency will determine the appropriate course of action;
- DTSC will request the services of the cleanup Contractor or other contractor to perform the tank removal work; and
- Cleanup Contractor will notify the Executive Officer or designee at the Los Angeles County Air Pollution Control District at least 24 hours prior to commencing excavation of UST or transfer piping which have stored or transferred VOC, name of the company performing the excavation, and the application number listed in this mitigation plan.

The Remediation Contractor will be responsible for the following tasks:

- Acquisition of all necessary permits from leading regulatory agency, APCD, and CAL/OSHA. These permits will include the UST Removal Permit from the Los Angeles County, Department of Public Works, the De-gassing Permit from the APCD (if needed), and an Excavation Permit from CAL/OSHA;
- Follow up site-specific health and safety plan requirements for management of the UST;
- Accessing the tank(s) which includes excavation and uncovering of the UST;
- Monitoring of combustible gasses and oxygen content using a combustible gas detector and a photo ionization detector;
- Removal and disposal of any residual liquid or sludge in the tank(s) at an appropriate regulated facility;
- Removal of any VOC-affected soil, and decontamination and degassing of the tank(s) and associated pipe work (cleaning);

- Disconnecting, dismantling, and removing the tank and associated pipe work from the excavation site (for tank abandonment by removal);
- Backfilling of the tank(s) with an inert solid such as cement or grout, if the tank is to be abandoned in-place;
- Disposal of the rinse water and sludge generated from cleaning of the tank (s) and associated piping at an appropriate regulated facility;
- Arrangement for the proper disposal of the tank(s) contents and affected soil; and
- Backfilling the tank excavation(s), if necessary.

VOC-affected soils generated during removal activities will be handled in accordance with all local, state and federal requirements.

The Cleanup Contractor will provide all necessary information for the UST closure report to DTSC as soon as possible, but no more than 3 days after the tank closure work is completed. This information must include the site name and address, the number of UST removed, the volume of UST, the content of the tank, a scaled site plan showing the tank and soil sample locations, and brief description of site activities. Any laboratory analytical reports, chain of custody forms, and waste manifests must also be submitted to DTSC. The Cleanup Contractor will prepare and submit a closure report to the leading UST removal agency (Los Angeles County EHD). The Los Angeles County Fire Department may require a copy of the closure report as part of their records.

Following completion of the work, on the final day of the tank removal, the Cleanup Contractor shall provide DTSC with the tank cleaning certification and certificate of disposal form for each UST. The tank cleaning certification form(s) will be submitted to the leading UST removal agency as part of the closure report.

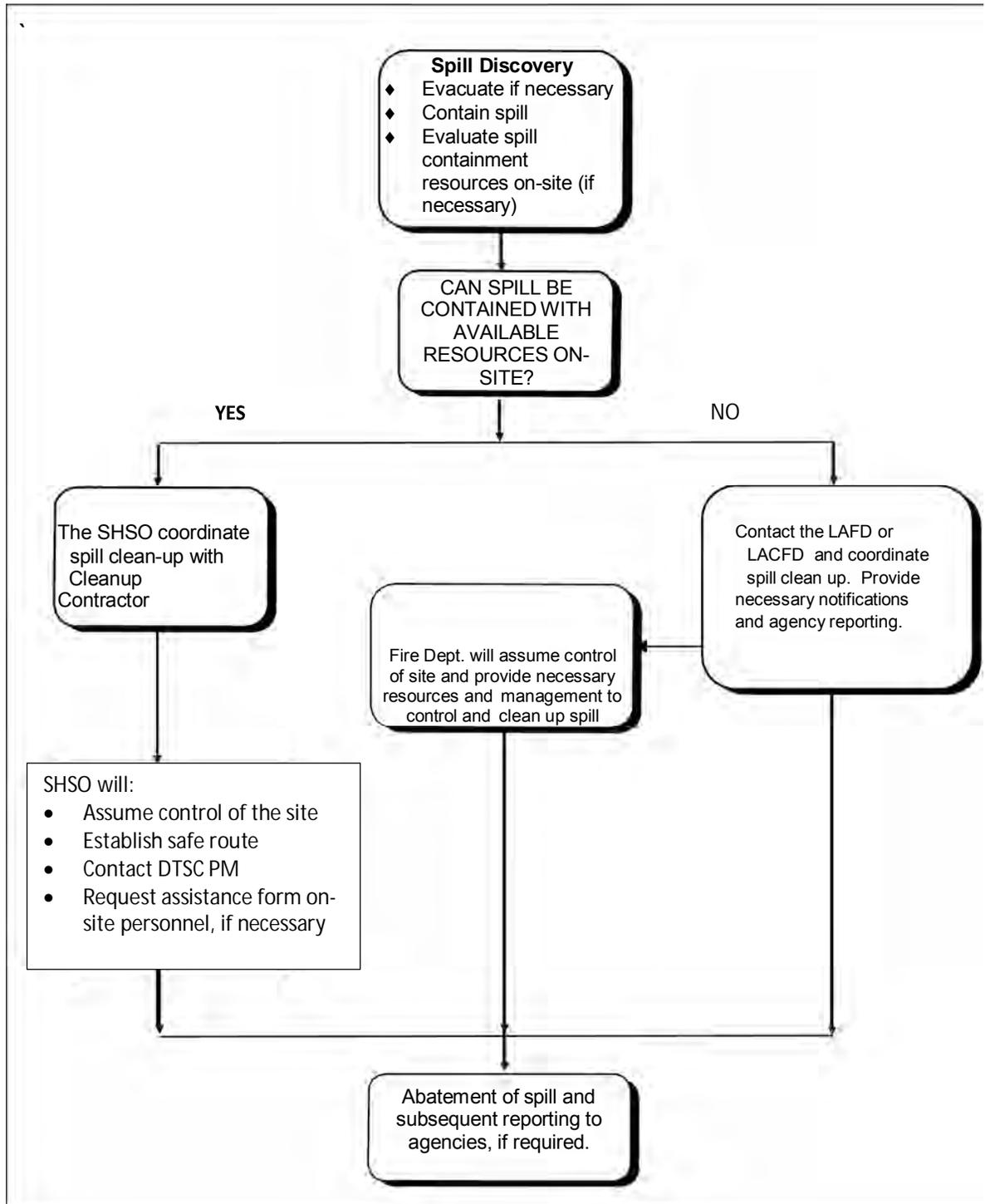


Figure 1
Initial Spill Response Actions
Multiple residences impacted by Exide operations

**Table 1
On-Site Spill Response Actions**

Action	Notes
<p>1. Stop the product flow at the closest container, valve, and/or pump (if it can be accomplished safely.). If applicable, activate emergency shut down switches. Determine if available resources are sufficient to control the spill.</p>	<p>Act quickly to secure pumps, close valves, etc. Do not enter any spill site to accomplish the shutdown. Stay upwind and upgradient of the spill.</p>
<p>2. Alert personnel within the immediate area, and notify appropriate Contractor and DTSC personnel If necessary, perform the following tasks:</p> <ul style="list-style-type: none"> ◆ Have nonessential personnel evacuate to the area <u>upgradient and upwind</u> and report to the designated safe refuge site. ◆ If there are trucks in the loading area or waiting to load, have the drivers remove their vehicles to a safe location outside the loading area, if it is safe to move the vehicles. ◆ Prevent any vehicles (other than emergency support services) from entering the area. 	<p>This action is to prevent any inadvertent action from compounding the situation. The SHSO at the safe refuge will account for all persons at the facility (those at the meeting place, those working to control the discharge, and those unaccounted for).</p>
<p>3. The PM will make appropriate notification to the agencies. Expedite notification if the spill may enter any sewer, storm drain, or waterway.</p>	<p>It is critical that notification be made immediately to ensure the safety of personnel and obtain additional resources as quickly as possible to control and minimize the discharge.</p>
<p>4. Isolate the discharge spill area and shut off ignition sources, if it can be accomplished safely.</p> <ul style="list-style-type: none"> ◆ For flowing fuel spills, without entering the spill area, build a dike in front of the spill using absorbents, dirt or sand. ◆ For puddled spills, place absorbent pads on top of the spill without entering the spill area. ◆ If fuel has reached a drainage ditch, extend several sorbent booms downstream across the ditch and/or build several dirt dams. ◆ Use sorbent to soak up fuel. ◆ Properly containerize used materials for disposal. <p>For small fires use a fire extinguisher to control/extinguish the fire if it can be accomplished safely. Stand by to assist emergency personnel if requested.</p>	<p>If applicable, control pumps, vehicles and other electrical sources. Ensure that no one is smoking near the discharge/spill site. Do not resume fuel operations until cleared to do so by a Fire Department Official.</p>

1.6 SPILL REPORTING

Spill reporting and post-response evaluation procedures must be conducted through formal documentation and follow-up investigation to identify the cause/source of the accident. Response procedures will be reviewed as part of post-response evaluation.

A Spill Data Worksheet and an Incident Report will be prepared by the SHSO following a spill response. The SHSO will submit these reports to Cleanup Contractor PM. The PM will review and submit it to DTSC PM. The report will contain, at a minimum, the following information:

- Time and date of incident;
- Incident description;
- Material and quantity spilled (for spills incidents);
- Initiation of emergency response;
- Description of the response(s), including a field sketch; and
- Caller notifications (Fire Department, Police, etc.).

1.7 POST-RESPONSE EVALUATION

Following completion of the Incident Report Form, the SHSO will prepare a Lessons Learned Report. The report will contain the following information and data:

- Time and date incident started and ended;
- Description of incident;
- Description of activating emergency response;
- Problems encountered during incident;
- Summary of post-incident activities, including any unusual actions or other events of interest; and
- Remarks and lessons learned.

The Lessons Learned Report will also include comments and input from the contractor and DTSC. If necessary, this Plan will be modified or revised based on recommendations from the Lessons Learned Report.

SPILL DATA WORKSHEET

Site Name: _____ Date: _____

Name of Person Completing Form: _____

Signature: _____

Provide the following information, with the fullest detail possible. Where estimating information, explain any limitations on the information provided and describe how the information was derived.

- | | |
|---|--|
| 1) Date, Time, and Duration of Release/Discovery of Release: | 7) Location of Release (both geographic location and boundaries): |
| 2) Discovered by (Name, Title, and Affiliation): | 8) Circumstances under which spill/release occurred (what happened): |
| 3) Material(s) Released (Attach MSDS if available): | 9) Any Injuries or Damage: |
| 4) Quantity Released: | 10) Response Measures, including Timing (e.g., containment, exposure protection or warnings, cleanup): |
| 5) Source of Release: | |
| 6) Medium into Which Release Occurred (e.g., air, soil, solid surface, water) (Describe): | 11) Weather Conditions (as they may affect spill response): |