



CITY ADMINISTRATION  
4305 Santa Fe Avenue, Vernon, California 90058  
Telephone (323) 583-8811

August 11, 2022

Honorable Administrator Michael S. Regan  
Environmental Protection Agency  
1200 Pennsylvania Avenue  
N.W. Washington, DC 20460

**RE: REQUEST FOR U.S. EPA TO LIST THE FORMER EXIDE FACILITY AND SURROUNDING INDUSTRIAL AND RESIDENTIAL AREAS CONTAMINATED BY PAST FACILITY OPERATIONS ON SUPERFUND'S NATIONAL PRIORITIES LIST**

Dear Honorable Administrator Regan,

The City of Vernon is writing to respectfully request that the United States Environmental Protection Agency ("U.S. EPA") list the former Exide Technologies Inc. facility in Vernon, California ("former Exide facility") and neighboring cities impacted by the former Exide facility's operations under the Comprehensive Environmental Response, Compensation and Liability Act ("Superfund") for cleanup. A Superfund priority listing would help to ensure the protection of residents, members of the community, and workers living within the socially, and economically disadvantaged communities surrounding the former Exide facility by bringing in federal resources and expertise to ensure the full remediation of toxic levels of lead in our environment.

The former Exide facility in Vernon, California contaminated residential communities with lead and dangerous chemicals with their battery recycling operation. The former Exide facility is located approximately five miles south of downtown Los Angeles and is surrounded by primarily environmental justice communities. The former Exide facility operated for more than 100 years as a lead acid battery recycling plant. Exide Technologies filed for and received bankruptcy protections in 2020, without investigating the full extent of its contamination, and without remediating the contamination that the State of California identified as emanating directly from the former facility's operations. Cleanup of the Exide lead contamination started in 2018 and remains ongoing. To date, the State of California has appropriated more than 700 million dollars to clean up thousands of affected residential properties, however the majority of the funds are being used to address corrective actions at the facility.

The City of Vernon is seeking federal intervention, as we believe that expanded ministrations will more effectively and immediately mitigate the serious health threats associated with lead exposures related to the former Exide facility and is confident that the involvement of the U.S. EPA will further efforts to protect and support the most vulnerable populations. The vast scale of such cleanup requires significant technical expertise, coordination, funding, and resources. Specifically, Vernon leaders request attention to the following:

- Expedited, thorough cleanup of the former Exide site;
- Rejection of the current remediation qualification baseline of 200ppm;
- Adoption of remediation qualification baseline of 80ppm and expedited, thorough cleanup of all impacted residences with lead levels measuring above this baseline (which is consistent with appropriate health and safety levels for lead); and
- The inclusion of attic cleanup of impacted residences (attics are currently excluded in cleanup efforts), as home heating and cooling ducts commonly flow through attic space. This presents an unacceptably high-risk of circulating lead particulates throughout the home.

*Exclusively Industrial*

Every impacted resident with unhealthy levels of lead in their home or soil deserves exhaustive remediation of this harmful chemical. As evidenced by the U.S. EPA's Draft Strategy to Reduce Lead Exposures and Disparities in U.S. Communities, lead is recognized as a dangerous heavy metal that is harmful to humans. The serious health threats associated with lead exposures add an acute urgency to this request which is fundamentally aligned with the current administration and the U.S. EPA's priorities to reduce such environmental hazards.

Today, we ask that the U.S. EPA help our low-income, underserved communities by prioritizing funding and collaboration with the state to ensure complete remediation of the former Exide site and the home of every resident impacted by unhealthy levels of lead. The Superfund was created for the purpose of remedying legacy pollution in vulnerable neighborhoods of color like ours and those surrounding the former Exide site. There is an opportunity to apply a full complement of federal and state regulatory tools to evoke action that helps the people who have been impacted. Every resource should be brought to bear to eliminate this contamination.

We are grateful for the current administration's pledge to protect communities suffering from environmental injustices, and we thank you for considering this request from the City of Vernon. The U.S. EPA's support of the City's request to address the health burdens caused by lead contamination in the Southeast Los Angeles area would underscore this administration's worthy commitment to eradicate the disproportionate exposure of certain populations to environmental threats.

Please feel free to contact City Administration at (323) 583-8811, extension 228, or [CityAdmin@cityofvernon.org](mailto:CityAdmin@cityofvernon.org) to discuss further.

Respectfully submitted,



Leticia Lopez  
Mayor  
City of Vernon, California

cc:

Governor Gavin Newsom  
U.S. Senator Feinstein  
U.S. Senator Padilla  
Representative Jimmy Gomez (CD 34)  
Representative Roybal-Allard (DC 40)  
Jared Blumenfeld, Cal EPA  
CA Senator Lena Gonzalez (SD 33)  
CA Senator Maria Durazo (SD 24)  
Assemblymember Miguel Santiago (AD 53)  
Supervisor Janice Hahn (District 1)  
City of Bell  
City of Commerce  
City of Huntington Park  
City of Los Angeles  
City of Maywood