

April 10, 2014

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Re: Exide Technologies (Exide) Maintenance Mitigation Plan (Phase 2)

Dear Mr. Nazemi:

As part of our continued proactive communications with the District, this letter provides an update on the status of maintenance activities and describes upcoming tasks and associated mitigation measures. Exide completed all the work described in my April 4 letter to you, and all Air Pollution Control Devices have been back on line since Monday, April 7th at 5:00pm.

Ambient air testing results for the last several days have been very low at all six District-approved monitors. In particular, the daily readings at the NE Monitor have been substantially below the Rule 1420.1 standard:

- April 3: 0.035 ug/m3
- April 4: 0.035 ug/m3
- April 5: 0.040 ug/m3
- April 6: 0.067 ug/m3
- April 7: 0.069 ug/m3
- April 8: 0.058 ug/m3

For this next phase of maintenance work, we have analyzed each particular work scope and possible mitigation option. We are planning to start this work on or about Saturday, April 12, and complete the work in the several days thereafter. Below is a summary description of the maintenance work and the mitigation plans. Exide will be constantly overseeing and evaluating the work as it progresses, and, if necessary, will take additional mitigation measures as may be required:

1. Major Maintenance Activities and Specific Mitigation Measures
 - a. Reverb Furnace Maintenance Activities
 - i. Description: Exide is cutting and installing new brick in the smelter building which is under a building enclosure.
 - ii. Specific Mitigation: Exide is using new brick and will be using wet cutting brick saws and water, thereby suppressing fugitive dust. In

addition, Exide will vacuum the work area before and after the work in order to minimize dust generation. It is important to note that water is detrimental to the type of brick used in the furnace and direct wetting will be avoided.

b. Blast Furnace Maintenance Activities

- i. Description: Exide is cutting and installing new brick for crucible repair in the blast furnace floor area.
- ii. Specific Mitigation: Exide is using new brick and will be using wet cutting brick saws and water, thereby suppressing fugitive dust. In addition, Exide will vacuum the work area before and after the work in order to minimize dust generation.

c. Reverb A-Pipe Maintenance

- i. Description: Exide is filling existing welding on new steel to complete the structure integrity.
- ii. Specific Mitigation: Exide is aware of the need to be particularly cautious regarding work around the A-Pipe. This work on the A-Pipe involves no cutting at all. Unlike prior work, the A-Pipe will remain completely intact. Exide will weld using new, clean steel to build up the walls of the A-Pipe. Exide will wash the area around the welds to ensure cleanliness. Exide will also use a vacuum to suck possible fumes with a flex hose to existing ventilation. Exide will then wash the roof of the building immediately after the work is complete to minimize fugitive dust.

d. Tank/Sump Maintenance (Tank 12)

- i. Description: Exide is welding and pouring grout on Tank 12 (Santa Maria tank) foundation and installing new steel walls for the tank.
- ii. Specific Mitigation: Exide will be providing an attendant to monitor that the large north building doors are closed at all times. If and when access is needed, work will be stopped until the door is closed.

e. Tank/Sump Maintenance (Tank 24)

- i. Description: Exide is conducting fiberglass work on the internal lining of Tank 24 (North Oxidation tank).
- ii. Specific Mitigation: Exide will wash the area around the tank to ensure cleanliness. Exide will maintain a wetted-down work area for the duration of the work. The actual work results in very low to zero risk for fugitive emissions.

f. Storm Water Piping Project Completion/Restoration

- i. Description: A small number of truckloads of soil & concrete will be taken out of the large white tent on the West Yard.
 - (1) Specific Mitigation: The loading of the material is done inside the tent. All the fugitive control measures and roadway controls will still be in place during any mobile equipment travel inside the yards.
- ii. Description: Several manholes in the plant have some minor concrete repairs needed around the covers. A few inches of the new concrete will be chipped off at the covers for the repairs.
 - (1) Specific Mitigation: The work site is under an enclosure, and Exide will use water suppression and vacuum all debris to prevent fugitive dust generation.
- iii. Description: Several areas around the plant yards and inside the baghouse & finished goods buildings have manholes with concrete joints. New concrete has been poured over the new pipe trench lines. These joints will be sealed with a compound to prevent plant water from migrating into the ground.
 - (1) Specific Mitigation: The work sites will be kept wet. Debris removed with hand tools will be vacuumed immediately during the process.
- iv. Description: The final work on the Storm Water project is cleaning the various contractor's equipment and removing it from the site.
 - (1) Specific Mitigation: The equipment will be power washed and inspected by Exide management personnel prior to it leaving the plant. All the areas of the yard where the project equipment was housed will be thoroughly vacuumed immediately after the equipment is removed.

g. Security Surveillance Camera Installation

- i. Description: Exide is finishing installing cameras in 4 locations on the exterior walls of buildings and on office roofs. This work entails mounting cameras by drilling small holes in walls/roofs.
- ii. Specific Mitigation: Exide will be providing an attendant with the contractor's workers to make sure the area is wet and will clean the area before and after to avoid dust generation.

- h. Smelting Building Production Office Repairs
 - i. Description: Exide is completing the repairs to the Smelting building's production office.
 - ii. Specific Mitigation: This is standard indoor office repair work that does not impact any facility equipment, and has little to no fugitive emission risk.
- i. RMPS Feed Room Sprinkler Installation
 - i. Description: The ongoing sprinkler installation requires moving the feed piles to access the entire ceiling area. Exide will have loaders relocate the piles as needed.
 - ii. Specific Mitigation: Proper operation procedures for moving the feed piles will be followed. The loaders are already in the feed rooms and will not exit the building.
- j. RCRA RFI sampling (DTSC)
 - i. Description: The sampling/drilling for the RFI work will be completed around the plant.
 - ii. Specific Mitigation: The drill head will be enclosed, and Exide will use water suppression and vacuum all debris to prevent fugitive dust generation.

Please contact me if you have any questions or comments.

Sincerely,
Exide Technologies



John Hogarth,
Vernon Plant Manager

cc: Bob Caruso, President and Chief Executive Officer
Bruce Cole, Executive Vice President, Strategy and Business Development,
President, Industrial Americas, Recycling, and Research and Development,
President, Asia Pacific
Bud DeSart, Senior Director, Commercial Operations, Recycling Group