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July 7, 2014

2013-2993

Mr. William Veile, P.E.
Office of Permitting
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

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

RE: Request for Extension
Exide Technologies Vernon California (EPA ID No. CAD 097 854 541)

Dear Sirs,

We appreciate your taking the time to meet with our team last week to review various permitting issues and the residential soil activities. Pursuant to your direction during the July 2, 2014 meeting between representatives of the Department of Toxic Substances Control (DTSC) and Exide Technologies (Exide), Advanced GeoServices Corp. has prepared this request on behalf of Exide for an extension to the schedule for submission of the revised complete Hazardous Waste Permit Application (Part B Application) for the Exide facility in Vernon, California.

The DTSC Third Notice of Deficiency letter (dated June 17, 2014) imposed a 30 day deadline from receipt of the DTSC Third Notice of Deficiency for submission of a revised complete Part B Application. As discussed in the July 2, 2014 meeting, Exide requires additional time beyond 30 days due to the adjustments in DTSC's regulatory interpretation regarding waste management devices and permitted units; DTSC's changes in position regarding the level of detail required in the Closure Plan and Closure Cost Estimate from previous submittals, comments, and discussions. For the reasons discussed and those cited above, we are asking for the following submission schedule:

August 4, 2014:	Completed Permit Application (excluding Closure Plan and Financial Responsibility Information).
August 18, 2014:	Closure Plan and Financial Responsibility Information.
August 18, 2014:	Process Fugitive Control Plan.

In addition to the requirement for submission of the revised complete Part B Application, the DTSC June 17, 2014 letter also asks that Exide submit all required tank assessments. Final Tank Assessments and Certifications for all existing tanks have already been provided except for Units 12, 13, 24, 50, 52 and 53. Units 12 and 24 were off-line and in the process of being rebuilt/repaired at the time of the most recent cessation of manufacturing/recycling operations. Based on conversations with the Contractor's performing the work and the Engineer performing the inspection and certifications 12 weeks (following SCAQMD approval to resume work) are required to complete reconstruction of Unit 12. Similarly, 4 weeks (following SCAQMD \ approval to resume work) are required to complete the work on Unit 24. Operation of the Raw Material Processing System (RMPS) cannot resume until Unit 12 is rebuilt and certified.

The tank inspection reports for Units 13, 50, 52 and 53, submitted to DTSC in June 2012, determined that those units have portions of their process piping below grade that must be relocated aboveground before final certification can be provided. Exide prepared and received DTSC approval of a work plan for removal of the underground piping to/from these units, but is awaiting South Coast Air Quality Monitoring District (SCAQMD) approval to proceed with the work. Removal of the underground piping and replacement with aboveground piping will require 8 to 10 weeks following receipt of SCAQMD approval. The Final Tank Certifications for Units 13, 50, 52 and 53 will be submitted 3 weeks after completion of field activities. Based on this projected schedule, we are requesting approval to submit the certifications for Units 13, 50, 52 and 53 12-weeks following SCAQMD approval to proceed with implementation of the work plan already reviewed and approved by DTSC.

The June 17, 2014 letter from DTSC also requests that Exide provide measures for Units 58 through 61 to prevent the sloshing of tank contents outside of the secondary containment area during a severe seismic event. Pursuant to discussions during the meeting between DTSC and Exide, a conceptual design will be provided with the August 18, 2014 submission with final details being provided on or before September 15, 2014. The final design will be installed with 60 after receiving DTSC approval of the final design.

We believe that the dates requested above are still very aggressive but believe that the level of detail and information requested by DTSC can be incorporated into the permit application package in a format suitable for approval.

Thank you for consideration of this request. If you have any questions please call me at 610-389-2468 or call Mr. Fred Ganster at 610-921-4052.

Sincerely,

ADVANCED GEOSERVICES CORP.

Paul G. Stratman, P.E.
Senior Project Consultant

PGS:mav

cc: Miriam Barcellona
Thomas Strang
Fred Ganster