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July 11, 2014

2013-2993-01

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

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

RE: Supplemental Information to Request for Extension Letter (July 7, 2014)
Exide Technologies, Vernon, California (EPA ID No. CAD 097 854 541)

Dear Mr. Veile and Mr. Ghazi:

Pursuant to your verbal request, Advanced GeoServices Corp. (Advanced GeoServices) offers the following supplemental information on behalf of Exide Technologies (Exide) regarding the July 7, 2014 Request for Extension letter for submission of the RCRA Hazardous Waste Permit Application. Specifically, the DTSC Third Notice of Deficiency letter (NOD letter) (dated June 17, 2014) imposed a 30 day deadline from receipt of the NOD letter for submission of a revised complete Part B Application.

Based on the additional information, clarification and discussions between key technical personnel from DTSC and Exide in the July 2, 2014 meeting in your offices in Sacramento, a significant amount of additional detail is required. Due to the time required to collect and compile that information, Exide requests additional time beyond that July 17, 2014 deadline. Specifically, we are asking for the following submission schedule for the reasons identified below:

August 4, 2014: Completed Permit Application (excluding Closure and Financial Information)

- Exide is adding the refining kettles and evaluating addition of the plastic chip trailer staging area as regulated units. Addition of new units requires collection of details, location and dimensions for the new units that must be added to multiple drawings and modification of Section 5.0 *Waste Management Devices and Permitted Units*.

August 18, 2014: Process Fugitive Control Plan

- Exide is preparing a Process Fugitive Emissions Plan (PFEP) to address dust accumulating on beams, rafters and other horizontal surfaces in those portions of the main manufacturing building that are operated under negative pressure but are not proposed for permitting as Containment

Buildings. The PFEP will include such requirements as routine cleaning of horizontal surfaces; limiting movement of vehicular traffic from containment building areas; and inspection and documentation. The PFEP will become an attachment to the housekeeping plan. Time is required to identify the areas requiring attention and for developing implementable procedures. The PFEP is intended to address DTSC comments regarding the need to permit the RMPS, Baghouse, Furnace and Finished Lead Warehouse Buildings as Containment Buildings.

August 18, 2014: Application Section 12.0 (Closure) and Appendix P (Closure Cost Backup Documentation)

- Exide is providing more detailed information regarding unit closure following a Work Breakdown Structure (WBS) format, as well as, supplemental details and sketches showing the units. As reviewed in the July 2, 2014 meeting, this will require development of a WBS form for each of the 80+ active permitted units and figure(s) for each cluster of unit(s). This alone is expected to require 80 to 100 hours of field time and an additional 300 to 400 hours of office time.
- Exide is soliciting updated unit pricing for major/large quantity items in the cost estimate, updating other unit prices with the 2014 Means pricing data, and incorporating specific unit prices and/or production rates included in the DTSC NOD letter.
- Exide is re-writing the Closure and Contingent Closure Plans to include demolition of the RMPS, Baghouse, Containment and Smelter buildings, decontamination of the Finished Lead Warehouse structure and excavation to a depth of 5 feet below existing grade under the footprint of the permitted units and their secondary containment areas excluding the Surface Impoundment and plastic chip trailer staging areas.
- Exide is preparing a spreadsheet linking decon/demo unit pricing, regulated unit sizes/dimensions and the overall cost estimate. The completed spreadsheet will be provided electronically to DTSC to facilitate review of the revised Closure and Contingent Closure Cost Estimates.

September 5, 2014: Application Section 13.0 (Financial Responsibility) and Appendix Q (Financial Assurance Documentation)

- Exide will include a fully executed financial assurance document as part of the complete submission once the final amount for financial assurance is calculated. We anticipate that approximately 15 days will be required to obtain necessary financial documents.

We believe that the dates requested above are still very aggressive but believe that the level of detail and information 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 Fred Ganster at 610-921-4052.

Sincerely,

ADVANCED GEOSERVICES CORP.

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

PGS:vm

cc: Miriam Barcellona-Ingenito
Thomas Strang
Fred Ganster