

April 1, 2014

Mohsen Nazemi, P.E.  
Deputy Executive Officer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

Re: Exide Technologies (Exide) Maintenance Mitigation Plan

Dear Mr. Nazemi:

Exide's Vernon facility has modified its maintenance activities during our ongoing scheduled maintenance shut down period that began on March 14, 2014. We have temporarily delayed the restart of production operations while we perform certain initial activities and mitigation measures outlined in this letter that are critical to improving our pollution control systems and maintaining compliance with Rule 1420.1. This letter will also respond to your March 29, 2014 letter and your March 31 email following Exide's recent reports to you about elevated ambient air monitor results occurring at our facility during the scheduled maintenance activities. As I explained in my Sunday, March 30 voicemail message to you, Exide stopped maintenance and repair activities on Sunday, except for regular housekeeping and controls, and for the time being has delayed the restart of production operations in order to maintain compliance with applicable SCAQMD requirements.

Exide has developed a Maintenance Mitigation Plan, set forth herein, which outlines the precautionary measures that Exide will undertake to avoid fugitive emissions as we recommence this critical work. We will update the District on our progress, if necessary, should additional activities require additional mitigation measures.

1. Maintenance Mitigation Plan Measures

Exide is implementing the following mitigation measures, which apply to all maintenance activities explained in this letter.

- a. Continuation of 1420 and 1420.1 Measures: Exide will remain diligent and continue to implement existing Rule 1420 and 1420.1 requirements, including vacuuming and washdowns of paving and floors.
- b. Washing the Plant's buildings' roofs: Exide has washed the roof of the RMPS building. Exide is proceeding with washing the remainder of the Plant's buildings' roofs.

- c. Limit Activity and Traffic in North Yard: Except for limited traffic needed for contractor access to perform air pollution control projects, Exide has suspended truck (including outgoing shipments of finished lead) and foot traffic in the northern portion of the facility. To the extent possible, truck traffic and personnel will enter from the south entrance.

## 2. Air Pollution Control Systems Activities and Specific Mitigation Measures

Exide will complete necessary maintenance tasks on its air pollution control systems in order to bring those controls back on-line for continued emission control. This section describes the various planned maintenance activities and explains the mitigation measures that Exide will take specific to that activity. These measures are in addition to those listed in Part 1 above.

- a. Hard Lead Baghouse Electrical Work
  - i. Description: Exide will replace the electrical power line to the fan used to provide draft to the hard lead baghouse, which is an air pollution control device for emission control.
  - ii. Specific Mitigation: This work only involves equipment on the filtered side of the baghouse.
- b. Maintenance Work on the Kiln Baghouse
  - i. Description: Exide will replace bags on two cells and replace HEPA filters in the kiln (feed dryer) baghouse to assist in proper operation.
  - ii. Specific Mitigation: This work only involves equipment on the filtered side of the baghouse.
- c. Scrubber Maintenance
  - i. Description: Exide is performing inspection and maintenance activities on the tray floors of the current primary metallurgical APCS tray scrubber.
  - ii. Specific Mitigation: Work will only be performed in enclosures within the scrubber (which is further enclosed inside the building) for emission control. The inside of the scrubber processes only filtered air.
- d. Baghouse Screw Installation
  - i. Description: Exide is replacing a screw and associated housing to the existing framework used to handle and transport dust collected in the hard

lead baghouse, the material handling baghouse, and the blast furnace baghouse.

- ii. Specific Mitigation: Exide is using new (clean) steel for the installation which will substantially reduce the likelihood of the lead fuming during welding. Exide will also power wash the existing framework to mitigate dust. The work will be conducted within the baghouse row building enclosure.

e. Reverb Baghouse Work

- i. Description: Exide will complete the replacement of the balloon screw, and will also replace and balance the reverb ID fan (which supplies draft to the furnace for emission control).
- ii. Specific Mitigation: Exide is using new (clean) steel for the installation of the balloon screw. The work will be conducted within the baghouse row building enclosure.

3. Other Critical Maintenance Activities and Specific Mitigation Measures

a. Tank/Sump Maintenance

- i. Description: Exide is conducting maintenance on certain of its tanks/sumps. This work is necessary to allow for appropriate operation of wastewater treatment.
- ii. Specific Mitigation: Exide is using new steel for the upgrades which will substantially reduce the likelihood of lead being fumed by welding.

b. Stormwater Piping -- Concrete

- i. Description: Exide will pour concrete paving over a small remaining unpaved area of newly installed stormwater pipe located in the South Yard. Paving is necessary to protect the piping system and restore the driveway for traffic and sweeping.
- ii. Specific Mitigation: Pouring concrete is not a fugitive lead generating activity. The work will only be performed in the South Yard.

c. Complete Water Sprinkler Installation

- i. Description: Exide will complete installation of the sprinkler and pump system in the RMPS building for fire protection purposes.

- ii. Specific Mitigation: The facility will wash down work vehicles upon entry and exit.

4. Other Critical Activities and Specific Mitigation Measures

a. Limited Receipt of Used Battery Deliveries

- i. Description: Exide continues to receive and store a minimal amount of used batteries.
- ii. Specific Mitigation: Deliveries only occur in the South Yard. The batteries arrive in intact cases and are shrink-wrapped and the lead in the batteries is not released.

b. Certain Required Activities

- i. Description: Exide will continue with activities required under applicable regulations, such as: (a) upon completion of tank/sump work, operation of wastewater treatment to treat storm water and washdown water, and receipt of treatment chemicals necessary to operate the wastewater treatment plant and (b) receipt of parts and equipment necessary to maintain the facility air pollution control equipment, facilities, and grounds.
- ii. Specific Mitigation: Operating wastewater treatment is not a fugitive lead generating activity. Deliveries only occur in the South Yard.

5. Transmittal of Sampling Results

As requested in your letter, Exide is taking appropriate steps to provide the District with monitor results on a daily basis. Samples are already being taken on a daily basis although results are not currently being received on a daily basis from the sampling contractor and independent laboratory. Exide is contacting the sampling contractor and independent laboratory to understand whether they can provide them on a daily basis. Exide has already contacted these parties to ensure that all sampling results are expedited to the extent possible so that they can be promptly transmitted to the District.

Mohsen Nazemi  
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Please contact me if you have any questions or comments. Exide requests a meeting with the District to discuss these issues.

Sincerely,  
Exide Technologies

A handwritten signature in blue ink, appearing to read "J. Hogarth", is written over a horizontal line. The signature is stylized and includes a flourish at the end.

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