



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 - www.aqmd.gov

April 12, 2014

John Hogarth
Vernon Plant Manager
Exide Technologies
2700 S. Indiana Street
Vernon, CA 90058

Re: Exide Technologies (Exide) Maintenance Mitigation Plan (Phase 2) and Exide's Proposed Refining Operations

Dear Mr. Hogarth:

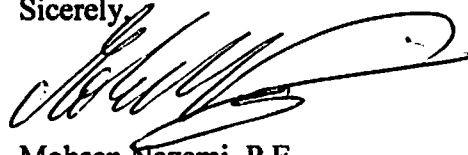
The South Coast Air Quality Management District (SCAQMD) is in receipt of your letter and email to me, dated April 10 and 11, 2014, respectively. In your April 10th letter you have proposed mitigation measures to be performed in Phase 2 of Exide Technology's (Exide's) maintenance, repair and renovation work that Exide is proposing to conduct at Exide's plant in the city of Vernon. Also in your April 11th email you have indicated that Exide would like to resume shipping of final lead products off-site to customers.

As we indicated to you at our meeting on April 3, 2014, and at this time based on Exide's 19 consecutive days (March 22, 2014 through April 9, 2014) of repeated exceedances of the rolling 30-day average ambient lead levels in violation of SCAQMD Rule 1420.1(d)(2), Exide must employ mitigation measures above and beyond ordinary mitigation measures to avoid any further lead releases contributing to these consecutive violations. The SCAQMD staff does not believe that the mitigation measures proposed in your April 10th letter is sufficient to accomplish this. In addition, the SCAQMD staff does not believe that direct addition of lead manually into the refining kettles is consistent with the manner in which the permit for refining kettles was evaluated and issued. If Exide would like to pursue such operation for the refining kettles, Exide needs to file applications to amend the permit to do so.

Please note that Exide is responsible for ensuring that its operations comply with environmental laws, including all of the applicable rules and regulations of the SCAQMD. This responsibility extends to Exide's current ongoing maintenance, repair and renovation activities or any other activities at Exide plant. Exide must take all necessary steps to ensure that it does not continue to violate SCAQMD rules and regulations while it conducts these activities. If Exide proceeds with Phase 2 of maintenance activities listed in your April 10th letter, or recommences shipment of final product to customers, Exide remains responsible for conducting these activities without creating additional air quality violations.

As stated in SCAQMD's March 29, 2014 letter, Exide is hereby again put on notice that if Exide initiates the proposed maintenance or other activities, any daily ambient lead concentration level above 0.15 ug/m³ measured at any of the ambient monitors around Exide that contributes to an exceedance of the rolling 30-day average ambient lead concentrations in violation of SCAQMD Rule 1420.1(d)(2), shall be considered as knowing, willful and intentional on the part of Exide.

Sincerely,



Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance

cc: Barry Wallerstein, Executive Officer, SCAQMD
Kurt Wiese, General Counsel, SCAQMD
Bayron Gilchrist, Assistant Chief Deputy Counsel, SCAQMD
Barbara Baird, Chief Deputy Counsel, SCAQMD