

February 12, 2013

Ms. Karen Baker
10955 Brighton Lane
Frisco, TX 75033

Re: Comments on Revised Decontamination and Demolition Work Plan, Perimeter Air Monitoring Plan, and Dust Control Plan, dated February 5, 2013.

Ms. Baker:

Exide appreciates your input on the Revised *Decontamination and Demolition Work Plan (DDWP)*, *Perimeter Air Monitoring Plan (PAM Plan)* and *Dust Control Plan (DC Plan)*. The Revised *DDWP*, *PAM Plan* and *DC Plan* addressed previous comments submitted by you and others. The additional comments you sent us dated February 5, 2013 have been carefully considered, including those that reiterate or expand upon previous comments, and final changes in response to these and other comments have been made to the extent appropriate. This letter responds to your February 5th comments on the revised plans.

Comments on DDWP Sections 1.0, 6.1, 7.0, 8.2, 8.5, and 8.7; DC Plan - General Comments, 3.1.1; PAM Plan Section 4.1. The *DDWP*, *PAM Plan* and *DC Plan* are first and foremost technical documents that spell out specific project elements that need to be implemented in the field. Therefore, the level of detail is that level appropriate to the task based on the professional judgment of the personnel and consultants charged with project implementation. These technical documents are not intended to restate the details of all applicable regulations and permit terms that apply to the project, any more than necessary. Also, the documents work together; so for example, the provision specifying that summary reports will be posted to the website when submitted to TCEQ is contained in the *PAM Plan* and not repeated in the *DC Plan*. Exide is committed to implementing the project in accordance with all applicable regulations and permit terms and, at times, this type of project requires the use of professional judgment. Accordingly, Exide has engaged an experienced and reputable team of both internal personnel and professional consultants to implement the project. There is ongoing supervision at multiple levels of project management and Exide remains engaged with TCEQ as well.

Comment on DDWP Section 6.1. Section 6.1 of the *DDWP* was revised to conform to the provisions of the RCRA permit, which was subject to notice and comment when issued. The RCRA permit provides for clean or contingent closure with associated conditions.

Comment on DDWP Section 8.2. Exide intends to retain ownership of, and therefore responsibility for, the property that contains the structures to remain.

Comment on DDWP Section 8.7. Exide has not yet determined whether any hazardous or Class 1 waste that may be generated during the course of the project will be treated on-site. If hazardous waste or Class 1 non-hazardous waste is generated during the course of demolition, and if Exide elects to treat it on-site, it will do so in accordance with applicable regulations.

Comment on DC Plan Section 1.0, PAM Plan General Comments and Section 1.0. Exide will post the *Demolition Site Health and Safety Plan*. The *Community Relations Plan (CR Plan)* will be posted following completion of coordination with the City of Frisco on the details of the plan. The *CR Plan* will layout more detail regarding the anticipated measures for public engagement.

Comments on DC Plan Section 2.0. In response to TCEQ comments, Exide specified a one-week inspection schedule for dust suppression equipment. More frequent inspections would not meaningfully improve the preventive maintenance program. Should there be an unexpected problem with a piece of dust control equipment necessary under the Plans, Exide must correct it or secure a replacement.

Comments on DC Plan Section 2.2, PAM Plan Sections 3.2, 3.4, 6.0. These comments either reiterate or build upon comments made by EPA and Exide already has given them careful consideration. The 20 mph wind speed “Stop Work” level was developed based on a review of data from the TCEQ Frisco Meteorological Station. A 20 mph threshold was established to supplement the perimeter air monitoring program, which also has “Take Action” and “Stop Work” levels based on real-time particulate monitoring data, while allowing for reasonable, continued progress of the remediation project. With respect to a change in wind direction, Exide revised the wind shift criteria for moving the particulate monitors from 180 degrees, which was an appropriate measure, to 90 degrees, a highly conservative measure, in response to EPA comments. Similarly, Exide has made some revisions to the Quality Control schedule (for example, increasing the frequency of cleaning the size selective inlets) in response to comment.

Comment on DC Plan Section 3.2. Exide has clarified in the *DC Plan* that loose salvage or waste material will be pre-wetted or sprayed for bulk load out to inhibit fugitive dust emissions.

Comment on PAM Plan Section 3.5, 3.5.3, 5.0. Exide plans to host quarterly public meetings, has provided a website for posting documents and for receiving questions or comments, and has provided contact information in its Plans. The *CR Plan* will be posted with more details upon completion of coordination with the City of Frisco.

The *Demolition Site Safety and Health Plan* and the revised and final *PAM Plan* and *DC Plan* should be posted shortly. We also will post the *CR Plan* in the very near future. Thank you for your input.

Sincerely,

A handwritten signature in blue ink that reads "Vanessa Coleman". The signature is fluid and cursive, with the first name being more prominent.

Vanessa Coleman
Site Manager

cc: Ms. Margaret Lidgarde, TCEQ
Mr. Bill Shafford, TCEQ
Mr. Mack Borchart, City of Frisco
Mr. John Blevins, EPA Region VI