

EXHIBIT “3”

DRAFT
COMPARISON BETWEEN EXIDE AND CITY OF FRISCO "ACTION LEVELS"
FORMER EXIDE INDUSTRIAL FACILITY, FRISCO, TEXAS

Media	Constituent	Exide cPCL (mg/Kg)	Source	Frisco cPCL (mg/Kg)	Source
Surface Soil (top 5 feet of soil)	Arsenic	196	$^{Tot}Soil_{Comb}$ PCL	15.9	5/30/2013 Revised Site-specific Background Study (Appendix 8 of Bowtie APAR)
	Cadmium	852	$^{Tot}Soil_{Comb}$ PCL	29.5	Tier 2 PCL calculation ($^{Ing}Soil_{GW-Class 2}$)
	Lead	1,600	$^{Tot}Soil_{Comb}$ PCL	274.51	Tier 2 PCL calculation ($^{Ing}Soil_{GW-Class 2}$)
	Selenium	None (160)	Per Appendix 9 of APAR $^{Ing}Soil_{Class 3}$ for selenium = 160 mg/kg.	1.55	Tier 2 PCL calculation ($^{Ing}Soil_{GW-Class 2}$)
Subsurface Soil (> 5 feet deep)	Arsenic	301	Tier 2 PCL calculation ($^{Ing}Soil_{Class 3}$)	5.9	TRRP Sitewide Median Background Value
	Cadmium	2,950	Tier 2 PCL calculation ($^{Ing}Soil_{Class 3}$)	29.5	Tier 2 PCL calculation ($^{Ing}Soil_{GW-Class 2}$)
	Lead	27,451	Tier 2 PCL calculation ($^{Ing}Soil_{Class 3}$)	274.51	Tier 2 PCL calculation ($^{Ing}Soil_{GW-Class 2}$)
	Selenium	None (160)	Per Appendix 9 of APAR $^{Ing}Soil_{Class 3}$ for selenium = 160 mg/kg.	1.55	Tier 2 PCL calculation ($^{Ing}Soil_{GW-Class 2}$)

Notes: cPCL = Critical Protective Concentration Limits (PCLs) for commercial/industrial facilities. A cPCL is derived by:

- 1) Determining the **lowest** value when comparing between TCEQ-defined PCLs and, potentially, PCLs calculated specifically for the site; and
- 2) Determining the **highest** value when comparing the lowest PCL to either state-published or self-determined background (ie - natural) values.

$^{Tot}Soil_{Comb}$ PCL = A state-defined "action limit" to prevent health impacts to adult workers. Only used in surface soil.

$^{Ing}Soil_{GW}$ = An "action limit" intended to prevent groundwater from being impacted by contaminated soil.

$^{Ing}Soil_{GW-Class 2}$ = A PCL calculated by CII to prevent Class 2 groundwater from being impacted above drinking water levels.

City of Frisco PCLs calculated using **Class 2** (i.e. - potentially usable) groundwater.

$^{Ing}Soil_{Class 3}$ = A PCL calculated by Exide/PBW to prevent Class 3 groundwater from being impacted more than 100 times the drinking water standards.

Exide PCLs calculated using **Class 3** (unusable/nonpotable) groundwater.