



TECHNICAL MEMORANDUM

Date: May 14, 2014
To: Gary Beyer, Project Manager, TCEQ
From: Anne Faeth-Boyd, Jay Winters
cc: Rick Booth, Matt Love
Project No.: 1302086
Company: Exide Technologies
Email: afaeth@golder.com

**RE: SUPPLEMENTAL TRANSPORTATION AND HANDLING PLAN
STEWART CREEK INTERIM ACTION WORK PLAN
SLAG AND BATTERY CASE FRAGMENT REMOVAL AND DISPOSAL
EXIDE FRISCO RECYCLING FACILITY
7471 5TH STREET, FRISCO, TEXAS 75034-5047
TCEQ SWR NO. 30516, TCEQ HAZARDOUS WASTE PERMIT NO. HW-50206
TCEQ AGREED ORDER DOCKET NO. 2011-1712-IHW-E, EPA ID NO. TXD006451090
CUSTOMER NO. CN600129779, REGULATED ENTITY NO. RN100218643**

This technical memorandum has been prepared in order to outline the procedures that will be used to transport materials that have been removed from Stewart Creek (slag and battery case fragments and soil/sediment) as a part of the interim actions being performed by Exide Technologies in Stewart Creek. This technical memorandum serves as a supplement to the existing procedures for the Interim Action activities as outlined in the following documents:

- Interim Action Work Plan Slag and Battery Case Fragment Removal and Disposal dated November 7, 2013.
- TCEQ Conditional Approval of Interim Action Work Plan, Slag and Battery Case Fragment removal and Disposal, dated December 17, 2013.
- Email from Gary Beyer of TCEQ to Anne Faeth-Boyd (and others), RE: Changes to Interim Action Work Plan, dated May 5, 2014.

1.0 PREPARATION

In addition to other field preparation activities outlined in the documents listed above, prior to removal of slag, battery case fragments or sediment/soil, all containers (buckets or drums) that will be used to store or transport materials removed from Stewart Creek will be labeled on the sides and top as follows:

Stewart Creek Interim Action Waste
Sediment/Battery Cases/Slag (list as appropriate)
Potentially Hazardous Waste - Currently Being Analyzed
DATE
Exide Technologies
7471 5th Street
Frisco, Texas 75034

If found, please contact:
Matt Love, Exide Technologies, (610) 220-0587
Robert Turner, RSI, (210) 844-6354

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2.0 REMOVAL ACTIONS

Identified slag or battery case fragments will be removed from wherever observed. The slag and battery case fragments and soil/sediment in direct contact and immediately surrounding will be placed into sealable plastic bags at each location and labeled with the location information. Slag and battery case fragments and soil/sediment from multiple locations can be placed in the same bag as long as the bag is labeled with all of the locations. The sealed plastic bags will be loaded into five gallon buckets labeled as indicated in Section 1.0, and logged on a field form. The field form will include a general description of the material, an identification number, location, date and time for material collected at each location. Each bucket will be tightly sealed when material is not being actively added. Buckets will remain in the possession of Exide contractors during all inspection and removal activities.

3.0 TRANSPORTATION FROM STEWART CREEK

After removal activities have been completed for a segment of Stewart Creek (at the minimum at the end of each day), Exide contractors will remove buckets from Stewart Creek and place them in a field vehicle for transport back to the Exide facility. The buckets will be secured in the interior of the field vehicle and the date/time of transport and the person transporting will be recorded by the Exide contractor transporting the buckets. If multiple trips are made from Stewart Creek back to the field vehicle prior to demobilizing back to the Exide Site, the field vehicle will be locked at all times.

At the end of each day (or more often if necessary), buckets will be transported in Exide's contractor's field vehicle back to the Exide Site. Buckets will remain in the interior of the field vehicle (truck cab) during transport. Material in buckets will be transferred into labeled drums on a paved area at the FOP upon arrival. Drummed materials will be handled in accordance with procedures outlined in the Interim Action Work Plan dated November 7, 2013.