



ALTA  
ENVIRONMENTAL

To: Amanda Cruz, United States Environmental Protection Agency (USEPA)

From: Eric Fraske, P.E., Alta Environmental/NV5

CC: Roberto Puga, P.G. and Jerry Faucheux, PFC  
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Date: January 13, 2021

Subject: Technical Memorandum #5: BESS Building Deconstruction

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The main electrical service to the former Exide Vernon facility is provided through a high voltage electrical transformer located on the northern exterior of Segment 3 (Attachment 1).

Due to the safety concerns (e.g., electrocution hazards) associated with the transformer's proximity to the Segment 3 northern wall and Segment 3 scaffolding, the transformer and electrical service distribution conduits will need to be relocated. The relocation of the transformer and associated electrical rerouting was included in Exide's November 6, 2019 request for an amended schedule. Also, the relocation of the transformer was discussed with the South Coast Air Quality Management District (SCAQMD) and Department of Toxic Substances Control (DTSC) during a presentation on the relocation held on February 27, 2020.

In order to facilitate the transformer relocation, several large pieces of electrical equipment will need to be installed at the current location of the BESS building (photograph 1).

**Photograph 1: BESS Building and Electrical Transformer (Facing East)**



At the southern end of the BESS building are existing subsurface electrical conduits that can be repurposed for the necessary electrical service rerouting associated with the transformer move (Photograph 2). The use of these existing conduits will eliminate the need to excavate any new utility trenches (which would require negative air enclosures) or install aboveground power lines, which could also become a potential safety hazard.

**Photograph 2: BESS Building (Facing North)**



Due to potential safety issues associated with the size of the electrical equipment that will be installed at the location of the BESS building (which will require a crane to lower the equipment into place), and the need to install electrical wiring from this equipment to the pole-mounted transformers and electrical lines along 26<sup>th</sup> street, the BESS building must first be deconstructed prior to the installation of this equipment.

### **PERMIT COMPLIANCE**

Decontamination and deconstruction of the BESS building will be conducted in general accordance with the methods and procedures defined in the Closure Implementation Plan (CIP). These procedures are consistent with those followed previously during Phase I closure activities, with the following clarifications.

VERT

January 13, 2021

Technical Memorandum #5

BESS Building Deconstruction

VERT-20-9944

- Requirements for enclosures, temporary enclosures, and real-time dust monitoring during decontamination and deconstruction activities at the Site are listed in Attachments 14 and 15 of the CIP. These attachments were incorporated into Exide's Title V permit as part of their Rule 1420.1 Compliance Plan for Closure Activities.
- The CIP was prepared to address the activities associated with Phase I Closure. Phase I Closure was defined as the decontamination and deconstruction of the facility's RCRA units. These units were primarily located within the large containment building in the north yard, the wastewater treatment plant, and a few isolated structures throughout the southern and western yards of the facility. The other structures located throughout the facility (the Non-Interim Status [Non-IS] buildings) are identified in the Closure Plan as "non-regulated areas."

These non-regulated areas and buildings were defined in Chapter 12 of the CIP as:

- BESS Building
- Engineering Building
- Product Storage Warehouse
- Chemical Storage Warehouse
- Employee Facilities Building
- Water Softener Building
- Garage/Mobile Maintenance Building
- Machine Shop
- Maintenance Storage Area
- Blue Lead Warehouse
- Scale House, and
- Cooling Tower

During Phase I closure, the roofs of these non-regulated areas were to be washed.

There is no requirement for the use of a temporary enclosure or negative air system during the decontamination or deconstruction of the non-regulated areas in the approved CIP or SCAQMD Rule 1420.1. Therefore, the decontamination of the BESS building will be done without a temporary enclosure or negative air filtration system. Rather the decontamination activities will be completed using standard industry practices as described.

While real-time air monitoring is not required during decontamination of the Non-IS buildings/non-regulated areas, ambient air monitoring will still be conducted at the facility's five perimeter sampling stations, and visual monitoring for dust will be conducted by field staff and oversight personnel. If concentrations of lead or arsenic are detected at ambient monitoring locations in excess of permitted levels, decontamination activities will be suspended until additional dust mitigation measures can be employed. If deemed appropriate by project stakeholders, real-time work area dust monitoring may also be conducted on an as-needed basis.

A meeting with the SCAQMD is scheduled for January 14, 2021, in which these assumptions regarding permit compliance will be discussed and verified.

## **DUST MITIGATION STRATEGY**

The decontamination and deconstruction of the BESS building will be performed by American Integrated Services (AIS), a licensed environmental remediation contractor. AIS's decontamination approach will generally follow the procedures outlined in the approved Closure Implementation Plan (CIP) to ensure that the lead-containing dusts are safely removed from the structures prior to deconstruction to protect both Site workers and the surrounding community. These procedures are presented in greater detail below.

## **SEQUENCE OF WORK**

Planning and preparation requirements and the general sequence of work for the BESS building decontamination are summarized below.

### **Pre-Decontamination Activities**

#### **Health and Safety**

All decontamination and deconstruction activities described in this Memorandum will be performed in accordance with AIS's existing Health and Safety Plan, which includes Covid-19 safety protocols. Additionally, AIS will prepare individual job-hazard-analyses (JHA's) for specific tasks conducted under this scope of work.

#### **Permits and Notifications**

A City of Vernon demolition permit and SCAQMD Demolition Notification have been obtained for completion of this work. An asbestos abatement notification will also be submitted to the SCAQMD.

#### **Asbestos Abatement**

Previous asbestos surveys identified the presence of asbestos containing building materials (ACM) within the BESS building. These materials will be abated prior to deconstruction. Asbestos abatement will be completed using standard industry practices that include SCAQMD-approved abatement methods. Following completion of asbestos abatement activities, NV5 will conduct a visual post-abatement confirmation survey to ensure that the identified ACM has been removed.

### **Decontamination Procedures**

After asbestos abatement is complete AIS will proceed with decontamination of the BESS building. Building decontamination will follow the general sequence below:

- Utility lockout/tag out (LO/TO) and safe off verification. AIS personnel will walk the BESS building and verify utility LO/TO and perform safe off and utility disconnection.
- Cleaning of all vertical and horizontal surfaces using SCAQMD-permitted HEPA Vacuums
- Removal of all loose and flakey paint from building surfaces using hand tools. Paint chips will be collected for disposal using the previously mentioned HEPA vacuums, and by hand. Collected paint chips will be transferred to on-site waste bins for disposal.
- Thorough wash down utilizing high pressure/low volume power washing on all surfaces.
- Collection of all rinse waters and placement within designated dewatering bins to filter out bulk suspended solids and sludge from cleaning rinsate. The filtered water will then be transferred to the on-site Wastewater Treatment Plan (WWTP) for processing. Solids and sludges within the dewatering bin will then be transported offsite for disposal.

- Application of a lead barrier compound (LBC)/encapsulant on building surfaces to prepare for demolition. A specification sheet for the LBC material is attached to this memorandum for reference. It is the same material that was previously used for encapsulation of vertical concrete surfaces on Segment 1 of the Main Containment Building.

### **Deconstruction Procedures**

Following completion of decontamination and encapsulation activities, AIS will proceed with deconstruction of the BESS building following the sequence below:

- Deconstruct the BESS building down to slab grade utilizing a combination of hand-wrecking (deconstruction using hand-held tools, torch cutting, etc.) selective dismantling of components and machine-wrecking utilizing excavators with bucket thumbs and or shear attachments.
- Water sprayers will be used for dust suppression during demolition/deconstruction activities. Work will be stopped during periods of elevated winds as defined in the Title V permit (sustained winds in excess of 12 miles per hour (mph)/wind gusts in excess of 20 mph).
- Process all debris and segregate in applicable waste streams for disposal and or recycling.
- Obtain bulk samples of waste streams scheduled for disposal and analyze for characterization and waste profiling for applicable disposal
- Load out waste and transport to applicable disposal and/or recycling facilities
- Upon completion of transportation and disposal of waste items, perform a final rinse down of slab areas within building footprint and adjacent areas as needed
- A thorough wash down utilizing high pressure/low volume power washing on all remaining surfaces within the limits of work
- Collection of all rinse waters and placement within designated dewatering bins to filter out bulk suspended solids and sludge from cleaning. The filtered water will then be transferred to the on-site Wastewater Treatment Plan (WWTP) for processing. Solids and sludges within the bin will then be transported offsite for disposal.

### **CEQA CONSIDERATIONS**

A City of Vernon Demolition Permit has been issued for the deconstruction of the BESS building. Furthermore, the deconstruction of the BESS building is a necessary measure required to safely complete the Segment 3 deconstruction and scaffolding task that are included in the previously approved Closure Plan and CIP. Based on a discussion with the Vernon Environmental Response Trust (VERT) CEQA consultant, additional CEQA analysis does not appear warranted for work described in this Memorandum.

### **SCHEDULE**

AIS will proceed with the deconstruction of the BESS building upon completion of asbestos abatement activities and receipt of approval of this Technical Memorandum from the USEPA.

### **ATTACHMENTS:**

Figure 1 – Annotated Segment 3 Demolition Plan

# Attachment 1: Annotated Segment 3 Demolition Plan

**NUMBERED NOTES (NOT SEQUENTIAL)**

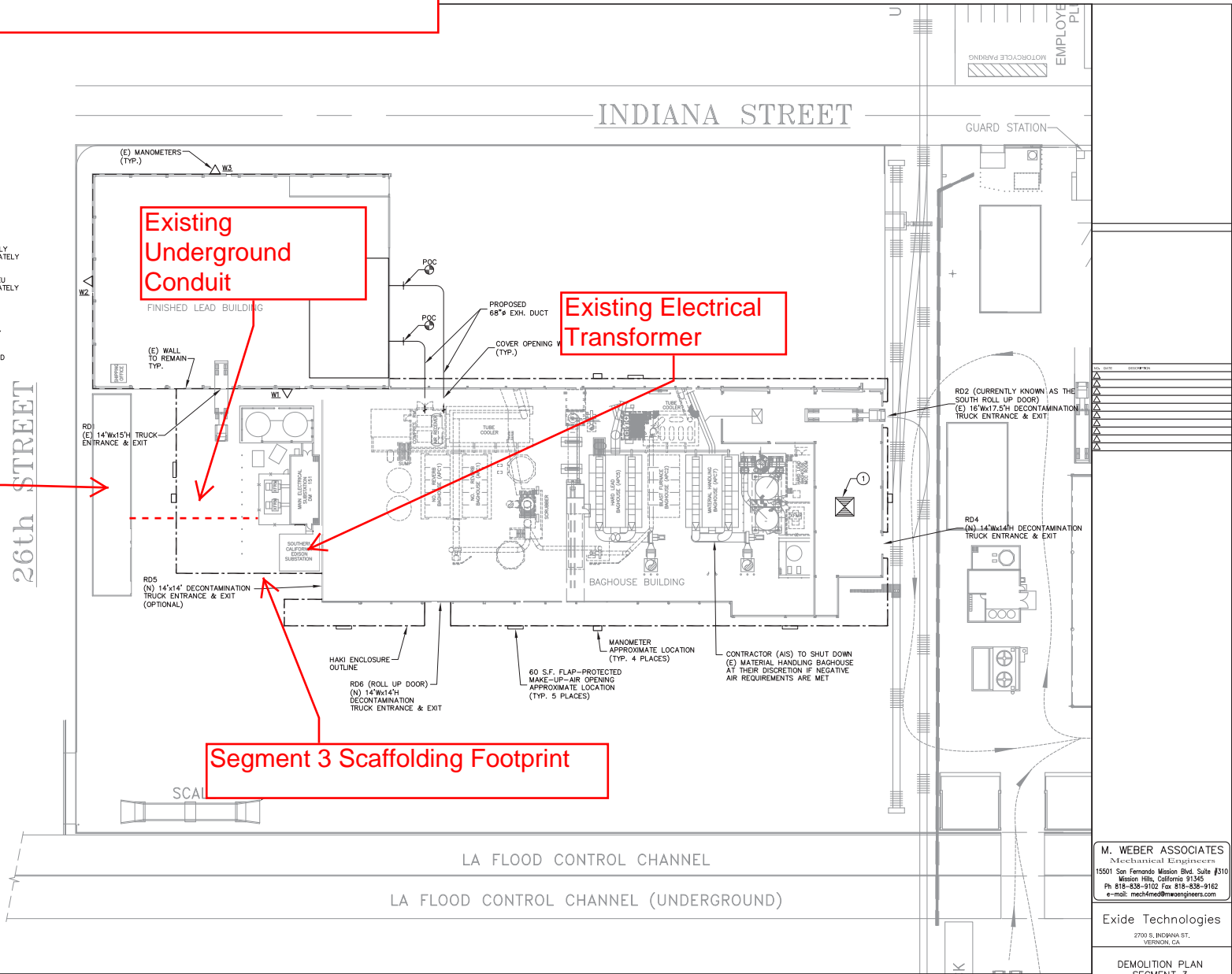
- ① APPROXIMATE LOCATION OF 144 S.F. CRANE ACCESS OPENING ON ROOF
- ② 14'x14' DECONTAMINATION TRUCK ENTRANCE & EXIT

**GENERAL NOTES**

- 1) THERE ARE THREE TRUCK ACCESS DOORS (RD2, RD3, & RD5) DURING SEGMENT 3 WORK. ONLY ONE TRUCK ACCESS DOOR CAN BE OPEN AND NEGATIVE PRESSURE CAN STILL BE APPROXIMATELY 0.02 INCHES OF WATER OR GREATER.
- 2) SHOULD ALL FIVE 60 S.F. FLAP-PROTECTED MAKE-UP-AIR OPENINGS BE OPENED ON THE FEU WALL, CLOSE ALL TRUCK ACCESS DOORS. THE NEGATIVE PRESSURE CAN STILL BE APPROXIMATELY 0.02 INCHES OF WATER OR GREATER.
- 3) THE EXISTING MANOMETERS (W2 & W3) WILL MONITOR THE FINISHED LEAD BUILDING.
- 4) THE SEGMENT 3 BUILDING WILL MAINTAIN A MINIMUM NEGATIVE PRESSURE OF APPROXIMATELY 0.02 INCHES OF WATER.
- 5) ALL EXISTING MANOMETERS (W1, STA4, BHN1 & BHN2) INSIDE THE FEU WILL BE REMOVED AND REPLACED WITH 4 PORTABLE MANOMETERS.

26th STREET

BESS Building



## DEMOLITION PLAN - SEGMENT 3

SCALE: 1"=30'



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DEMOLITION PLAN  
SEGMENT 3

DATE: M-3  
SCALE: 1"=30' DRAWN BY: DRA  
JOB #: 01/16/19