



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
 75 Hawthorne Street  
 San Francisco, CA 94105

<b>Inspection Date(s):</b>	6/14/2022	<b>Inspection Announced:</b> Yes
<b>Time:</b>	10:30 am – 1:00 pm	
<b>Regulatory Program(s):</b>	RCRA Subtitle C (Hazardous Waste)	
<b>Facility/Company Name:</b>	Stringfellow Superfund Site	
<b>Facility/Site Location:</b>	3450 Pyrite Road, Riverside, CA 92509	
<b>Geographic Coordinates:</b>	34.01972, -117.462045	
<b>Facility/Site Contact:</b>	Piotr Kostecki Stringfellow Project On Site Engineer Department of Toxic Substances Control	Piotr.Kostecki@dtsc.ca.gov
<b>Facility/Site Identifier:</b>	CAD981161870	
<b>Generator Status:</b>	Large Quantity Generator (LQG)	
<b>NAICS:</b>	NAICS Code 56290	
<b>Facility/Site Personnel Participating in Inspection:</b>		
Piotr Kostecki	Stringfellow Project On Site Engineer Department of Toxic Substances Control	<a href="mailto:piotr.kostecki@dtsc.ca.gov">piotr.kostecki@dtsc.ca.gov</a>
Jeffrey Muller	Exide Project Senior Engineering Geologist Field Operations Supervisor Department of Toxic Substances Control	<a href="mailto:jeffrey.muller@dtsc.ca.gov">jeffrey.muller@dtsc.ca.gov</a>
<b>Inspector(s):</b>		
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<b>Supervisor Review:</b>		
Kaoru Morimoto Manager, Hazardous Waste and Chemical Section		<a href="mailto:morimoto.kaoru@epa.gov">morimoto.kaoru@epa.gov</a> (415) 972-3306

## **SECTION I – INTRODUCTION**

### **Purpose and Scope of the Inspection**

On June 14, 2022, U.S. Environmental Protection Agency (EPA) conducted a compliance evaluation inspection (CEI) of the Stringfellow Superfund Site located at 3450 Pyrite Road, Riverside, California, EPA ID No: CAD 981161870. The purpose of the CEI was to evaluate the compliance of the container storage activities of the environmental samples from the Exide Preliminary Investigation Area (PIA) with the applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279, the California Health and Safety Code (HSC), Division 20, Chapter 6.5; the California Code of Regulations (CCR), Title 22, Division 4.5.<sup>1</sup>

### **Facility/Site Description**

Stringfellow Superfund Site consists of a former hazardous waste facility and a plume of polluted groundwater in Jurupa Valley, California. California Department of Toxic Substances Control (DTSC) continues to extract and treat the contaminated groundwater via its onsite treatment facility, Pyrite Canyon Treatment Facility (PCTF). The PCTF replaced the original Pre-Treatment Plant (PCP) in 2016 as the treatment facility for the site.

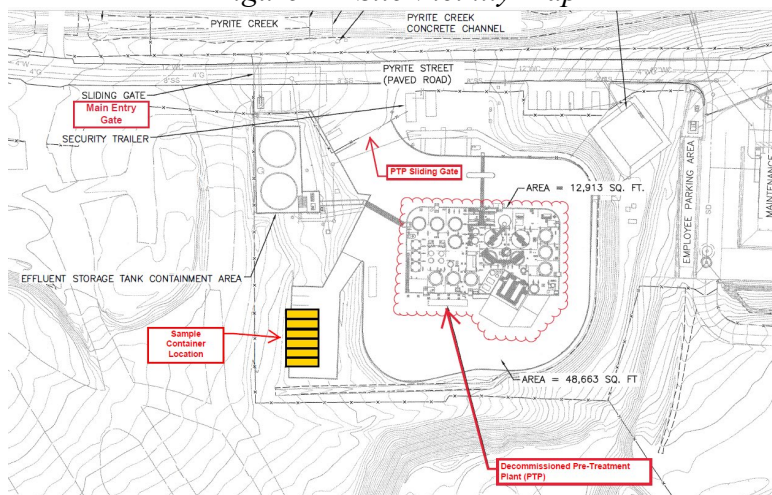
The environmental samples collected from the Exide PIA are stored in six CONEX boxes (cargo containers) near the site of the decommissioned PCP (refer to Figure 1, Figure 2, Figure 3 and Figure 4). The PIA is defined as an area encompassing an approximately 1.7-mile radius surrounding the former Exide Technologies, Inc., (Exide) battery recycling facility in Vernon, California. DTSC is responsible for cleaning up the lead contaminated soil at residential properties, schools, parks, day care centers, and childcare facilities associated with the environmental release from Exide. The PIA samples are currently subject to litigation hold.

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<sup>1</sup> All citations in this report refer to the California Code of Regulations (CCR) refer to Division 4.5 of Title 22 of the current California Code of Regulations. EPA is enforcing California hazardous waste management program requirements as approved and authorized by the United States on August 1, 1992 (see 57 Fed. Reg. 32726, July 23, 1992), September 26, 2001 (66 Fed. Reg. 49118, September 26, 2001), October 7, 2011 (see 76 Fed. Reg. 62303, October 7, 2011) and January 14, 2020 (see 85 Fed. Reg. 2038, January 14, 2020). Corresponding Federal citations are provided as a convenience in brackets.



*Figure 1 – Site Vicinity Map*



*Figure 2 – Exide Sample Container Storage Location*

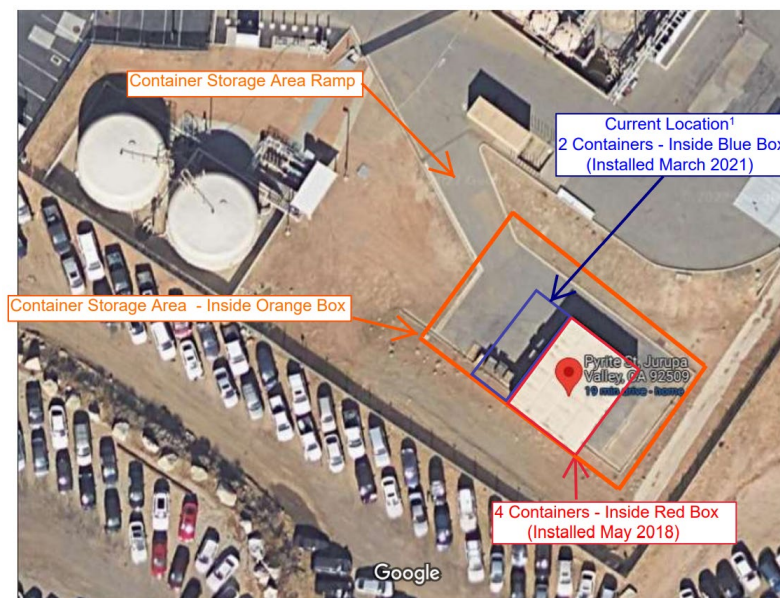


Figure 3 – Exide Sample Container Storage Location (aerial view)

## SECTION II – ON-SITE OBSERVATIONS



*Figure 4 – Six CONEX Boxes*

EPA Inspector Sharon Lin arrived at the main entry gate of the Stringfellow Superfund Site at 10:30am on June 14, 2022. Piotr Kostecki granted access for EPA's inspection. Mr. Jeff Muller provided a health and safety briefing for EPA.

Piotr Kostecki and Jeff Muller led EPA to the Exide Sample Container Storage Area at the decommissioned PCP which was located adjacent to the main entry gate. EPA observed six locked CONEX boxes (cargo containers). The CONEX boxes are identified as CONEX box A, B, C, D, #228169-0 and #229429-7, from left to right (refer to Figure 4). According to Mr. Muller and Mr. Kostecki, the storage area was used as an employee parking lot when the PCP was in operation prior to 2016.

According to Mr. Muller, CONEX boxes A, B, C and D were installed in May 2018. The dimension for each of these four CONEX boxes was 40 feet in length, 8 feet in width, and 9.5 feet in height. CONEX boxes #228169-0 and #229429-7 were installed in March 2021. The dimension for each of these two CONEX boxes was 40 feet in length, 8 feet in width, and 8.5 feet in height. In May 2018, DTSC had anticipated up to seven CONEX boxes to be stored at this location based on the SOP for Exide Sample Retention and Management at Stringfellow Site (refer to Appendix B).

Mr. Muller described the sample shipment logistics as the following: The environmental laboratories which performed analyses of the Exide PIA samples were obligated to hold the samples for a specified time period under their contract with DTSC. When that specified contract period expired or neared expiration, the laboratory would contact Mr. Muller via a consultant to the DTSC. Mr. Muller would then contact Mr. Kostecki to arrange for a suitable date for shipment of the samples. Mr. Muller, Mr. Eric Garcia and Mr. Kostecki would be available to receive and store the laboratory samples in the CONEX boxes.

Mr. Kostecki opened each of the six CONEX boxes for EPA. EPA inspected each of these six

containers. EPA did not observe any climate controls in these CONEX boxes.

EPA observed an “Exide Sample Storage Container Field Binder” in each of the six CONEX boxes. The binder was visibly displayed at the entry point of the CONEX box once it was opened (refer to Appendix A Photograph P6140037). The field binders included the “Storage Container Access Logs” (refer to Appendix A Photograph P6140028). It appeared only authorized staff had accessed these CONEX boxes based on the EPA’s review of the access logs. Currently authorized staff to access the CONEX boxes include Mr. Kostecki, Mr. Muller, and Mr. Eric Garcia with DTSC.

EPA observed pellets of boxes storing the Exide PIA sample jars in CONEX boxes #229429-7 and #228169-0. EPA observed pallets of boxes and boxes on shelves storing the Exide sample jars in CONEX box A, B, C and D. The samples have not been unpacked since the receipt of the sample shipments except for one or two incidences in the past two years, according to Mr. Muller.

EPA randomly selected a packaged sample box in CONEX box C and asked Mr. Muller to open the box so EPA could observe the condition of the individual containers holding the samples. EPA observed a glass sample jar containing soil sample collected by the Exide PIA project (refer to Appendix A pictures P140038, P140039, P140040). Boxes and sample jars appeared to be in good condition.

EPA selected a pallet of boxes (Pallet 7\_9-8-21) in CONEX box 229429-7 and work order 440-26188 in CONEX box D. EPA asked Mr. Muller to produce the detailed sample information in the randomly selected containers. Mr. Muller was able to provide chain of custody documents from the shippers (laboratories) associated with these samples in a timely manner.

### **Section III – RECORDS REVIEW**

#### **Access Log**

EPA reviewed access logs in the field binder present in each of the six CONEX boxes. EPA notes the following:

1. Last access date prior to EPA’s 6/14/2022 inspection:

CONEX Box	Last access date
A	2/17/2022
B	6/14/2022
C	9/29/2021
D	9/22/2021
#228169-0	3/17/2021
#229429-7	9/08/2021

2. All entries for the access logs were properly filled out by the authorized DTSC personnel.

### **Sample Tracking System**

At EPA's request, Mr. Muller showed EPA the Stringfellow Laboratory Samples Inventory Summary, an electronic sample tracking system for the samples in the six CONEX boxes. This electronic sample tracking spreadsheet was organized in a way where DTSC would be able to readily locate the samples in the CONEX box. The information in the inventory summary has been constantly updated based on the information in the Exide EQUIS database system.

At the time of EPA's inspection, there were 162,184 samples from the Exide residential PIA sampling and 26,092 samples from the Exide parkway PIA sampling stored in the six CONEX boxes. According to the laboratory samples inventory summary, the required holding times to perform an EPA Method 6010 metals (lead) analysis were expired for 161,907 out of the 162,184 samples from the residential PIA and all of the 26,092 samples from the parkway PIA.

### **Section IV – CONCLUSION**

EPA has determined that the management of the Exide PIA samples at the Stringfellow Superfund Site does not violate the applicable RCRA hazardous waste regulations. The samples that are currently held in the six CONEX boxes are not considered waste. In addition, the sample containers were managed in a responsible matter and in accordance with the procedures specified in the SOP. In addition, EPA did not observe any release of the contaminants in these samples based on the visual inspection and the records review.

EPA has consistently taken the position that if the materials are continued to be needed as part of investigation or litigation, the materials would generally not be considered waste. Once the materials are released from the litigation/investigation hold, the generator of the materials would make a waste determination to decide whether to recycle or dispose of the materials (Refer to the RCRA Online memos in the References section below). In this case, the environmental samples in the CONNEX boxes were collected to delineate the extent of contamination caused by release from the former Exide facility in Vernon. The materials would be considered solid waste and subject to a hazardous waste determination and any applicable RCRA regulations at the time the litigation hold is released.

### **Figures:**

Figure 1 – Site Vicinity Map

Figure 2 – Exide Sample Container Storage Location

Figure 3 – Exide Sample Container Storage Location (aerial view)

Figure 4 – Six CONEX Boxes

### **References:**

EPA RCRA Online Memos 11363, 14881, 14893

<https://rcrapublic.epa.gov/files/11363.pdf>

<https://rcrapublic.epa.gov/files/14881.pdf>

<https://rcrapublic.epa.gov/files/14893.pdf>

## **Appendix**

Appendix A – Inspection photographs

Appendix B – SOP for Exide Sample Retention and Management at Stringfellow Site

## Appendix A

Inspection Photographs taken by Sharon Lin with EPA using Olympus TG-5 tough camera with EPA inventory decal #S72367 on June 14, 2022

Photograph #	Description
P140020, P140021, P140022, P140023	CONEX boxes
P140024	Piotr Kostecki opened the lock of CONEX box #229429-7
P140025	Pallets of boxes storing Exide sample jars in CONEX box #229429-7
P140026, P140027	Pallet 7_9-8-21 and the associated sampling chain of custody document in CONEX box #229429-7
P140028	Access Log for CONEX box #229429-7
P140029	Manufacture information on the CONEX box #228169-0
P140030	Pallets of boxes storing Exide sample jars in CONEX box #228169-0
P140031, P140032, P140033, P140034	Pallets and shelves of boxes storing Exide sample jars in CONEX box D
P140035	Work Order 440-26188 and associated sample chain of custodies – CONEX box D
P140036	Pallets and shelves of boxes storing Exide sample jars in CONEX box C
P140037	Access Log book for CONEX box C
P140038, P140039, P140040	Glass jar containing soil sample with sample ID RP1590-02-03 in CONEX box C
P140041	CONEX box B
P140042	Pallets and shelves of boxes storing Exide sample jars in CONEX box B
P140043	20 black plastic totes containing sample jars in CONEX box B
P140044	Sample label on top of one of the black plastic totes in P140043
P140045	Pellets and shelves of boxes storing Exide sample jars in CONEX box A

# Stringfellow

EPA ID # CAD 981 161 870

June 14, 2022 Inspection Photos

All photos were taken by Sharon Lin, US EPA Region 9



P6140020



P6140021



P6140022



P6140023



P6140024



P6140025



P6140026

CHAIN OF CUSTODY

Pallet No  
7-9-8-21

PAGE 1 OF 1

SAMPLES RETURNED TO:  
3400 FORDYK STREET  
RIVERVIEW, CA 94058

PROJECT NAME:  
EXIDE RESIDENTIAL PROPERTY SOIL ASSESSMENT

SAMPLES FROM THE FOLLOWING WORK ORDERS ARE TRANSPORTED UNDER THIS CHAIN OF CUSTODY

440-277205	440-277410	440-277705	440-278656	440-278738	440-278941
440-277206	440-277414	440-277706	440-278657	440-278739	440-278942
440-277207	440-277415	440-277710	440-278658	440-278743	440-278943
440-277208	440-277568	440-277712	440-278659	440-278745	440-278944
440-277209	440-277569	440-278653	440-278660	440-278746	440-278945
440-277210	440-277570	440-278654	440-278661	440-278939	440-278946
440-277409	440-277704	440-278655	440-278662	440-278940	440-278947

Relinquished by: Roger Hoover Signature: [Signature] Date & Time: 9-8-21  
 Name: Eurofins California Custody seals: \_\_\_\_\_  
 Location: \_\_\_\_\_

Relinquished to: \_\_\_\_\_ Signature: \_\_\_\_\_ Date & Time: \_\_\_\_\_  
 Name: \_\_\_\_\_ Custody seals: \_\_\_\_\_  
 Location: \_\_\_\_\_

Relinquished by: \_\_\_\_\_ Signature: \_\_\_\_\_ Date & Time: \_\_\_\_\_  
 Name: \_\_\_\_\_ Custody seals: \_\_\_\_\_  
 Location: \_\_\_\_\_

Relinquished to: \_\_\_\_\_ Signature: \_\_\_\_\_ Date & Time: \_\_\_\_\_  
 Name: \_\_\_\_\_ Custody seals: \_\_\_\_\_  
 Location: \_\_\_\_\_

P6140027



Matthew Rodriguez  
Secretary for  
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



Edmund G. Brown Jr.  
Governor

STORAGE CONTAINER ACCESS LOG  
Exide Sample Storage at DTSC Stringfellow Site

Date	Time of		All Personnel in Party (Name/Affiliation)	Reason for Access	Removing Samples? (Y/N)	Comments/Observations
	Entry	Exit				
6/1/21	0915	1530	Jeff Miller / DTSC Piotr Koskela / DTSC	Placing Sample Pellets		

Date	Time of		All Personnel in Party (Name/Affiliation)	Reason for Access	Removing Samples? (Y/N)	Comments/Observations
	Entry	Exit				
9/8/21	0900	1450	Jeff Miller / DTSC Piotr Koskela / DTSC	Placing Sample Pellets		

Date	Time of		All Personnel in Party (Name/Affiliation)	Reason for Access	Removing Samples? (Y/N)	Comments/Observations
	Entry	Exit				

Storage Container #: 229429-7

Page \_\_\_\_ of \_\_\_\_

P6140028

APPROVED FOR TRANSPORT  
UNDER CUSTOMS SEAL

USA/623-AB/C3-04

TYPE 1AA-100A42G1C MANUFACTURER'S NO. OF THE CONTAINER NSSC078 04

MANUFACTURED BY: <b>CIMC</b> WANTONG CIMC-SMOOTH SAIL CONTAINER CO., LTD.		OWNED BY: MATCON NAVIGATION COMPANY INC. 555 12TH STREET OAKLAND, CA 94607	
EXTERNAL LENGTH	49' FOOT	12192 MM	
EXTERNAL WIDTH	8' FOOT	2439 MM	
EXTERNAL HEIGHT	8'-6" FOOT	2592 MM	

TEMPER COMPONENT TREATMENT IM/TAIL/EC4401/2007

**CSC SAFETY APPROVAL**  
USA/AB-623/C3-04

DATE MANUFACTURED	7/2007	ACEP U.S.A. #089/ 002
IDENTIFICATION NO.	18470 228	
MAXIMUM GROSS WEIGHT	20400 KGS 61000 LBS	
ALLOW. STACK HT. FOR ONE TRACKING UNIT HIGH VANE	10400 KGS 23500 LBS	

P6140029



P6140030



P6140031



P6140032



P6140033

~~B27-979-21~~

GLASS  
HANDLE WITH CARE

HANDLE

HA  
12\*

#2

CHAIN OF CUSTODY

Pallet No. 21  
PAGE 1 OF 3

SAMPLES RETURNED TO:  
EPI/LODOL  
300 PLYM STREET  
ROSELAND, CA 95069

PROJECT NAME:  
GREAT RESIDENTIAL PROPERTY RISK ASSESSMENT

SAMPLES FROM THE FOLLOWING WORK ORDER ARE TRANSPORTED UNDER THIS CHAIN OF CUSTODY.  
INDIVIDUAL WORK ORDER CHAIN OF CUSTODY ARE TRANSPORTED IN THE ASSOCIATED SAMPLE BOX.

WORK ORDER	CHAIN OF CUSTODY	TRANSPORTED UNDER THIS CHAIN OF CUSTODY			
440-254343	440-254621	440-255044	440-255960	440-260566	440-260880
440-254314	440-254645	440-254646	440-255945	440-260565	440-261035
440-254573	440-255063	440-254647	440-255946	440-260563	440-261036
440-251887	440-255070	440-255948	440-255947	440-260567	440-261038
440-251860	440-255071	440-255955	440-255948	440-260568	440-261037
440-251761	440-255072	440-255956	440-255949	440-260567	440-261038
440-258028	440-255073	440-255957	440-255950	440-260568	440-261039
440-258030	440-255074	440-255958	440-255951	440-260565	440-261040
440-258047	440-255077	440-255959	440-255952	440-260562	440-261097
440-258048	440-255078	440-255959	440-255953	440-260566	440-261098
440-258049	440-255079	440-255964	440-255955	440-260567	440-261099
440-258062	440-255088	440-255965	440-255956	440-260570	440-261100
440-258317	440-255089	440-255966	440-260271	440-260571	440-261101
440-258376	440-255090	440-255966	440-260272	440-260569	440-261111
440-258377	440-255092	440-255963	440-255958	440-260578	440-261112
			440-260470	440-260579	440-261113

Relinquished by: Don Hoover Signature: Don Hoover Date & Time: 7/29/04 7:00  
Name: Calusa Location: Calusa Custody seals: \_\_\_\_\_

Relinquished to: \_\_\_\_\_  
Name: \_\_\_\_\_ Location: \_\_\_\_\_ Signature: \_\_\_\_\_ Date & Time: \_\_\_\_\_

Relinquished to: \_\_\_\_\_  
Name: \_\_\_\_\_ Location: \_\_\_\_\_ Signature: \_\_\_\_\_ Date & Time: \_\_\_\_\_

Relinquished to: \_\_\_\_\_  
Name: \_\_\_\_\_ Location: \_\_\_\_\_ Signature: \_\_\_\_\_ Date & Time: \_\_\_\_\_

P6140034

**NEC** 151 Hammond, Suite 308, Irvine, CA 92618  
 T (949) 858-8024  
**EPI Global** 5251 West Imperial Highway, Los Angeles CA 90048  
 T (213) 854-4300 F (213) 854-0196 EPI Global.com

Project Name: Baseline OR Site Soil Remediation  
 Address: 3545 PYRITE STREET RIVERSIDE, CA 92509  
 EPI P#: 44-00813 EPI Q#: 00101  
 Sampled By: Ben Cohen, Jacob Barnes, Angel Cabrera AMP: 1700020008

**Chain of Custody Record and Analysis Request**

Sample ID	Lab ID	Site	Matrix	Preservation	Sampling Information	Method	Analysis	Remarks
1	RP0187-C01-12	X	X		02-19-10 1432	X		
2	RP0187-C01-18	X	X		1432	X		
3	RP0187-C02-12	X	X		1437	X		
4	RP0187-C02-18	X	X		1450	X		
5	RP0187-C03-12	X	X		1456	X		
6	RP0187-C03-18	X	X		1459	X		
7	RP0187-C04-12	X	X		1452	X		
8	RP0187-C04-18	X	X		1455	X		
9	RP0187-C05-12	X	X		1451	X		
10	RP0187-C05-18	X	X		1474	X		
11	RP0187-C06-12	X	X		1452	X		
12	RP0187-C06-18	X	X		1455	X		
13	RP0187-C07-12	X	X		1424	X		
14	RP0187-C07-18	X	X		1427	X		
15	RP0187-C08-12	X	X		1425	X		
16	RP0187-C08-18	X	X		1428	X		
17	RP0187-C07-12D	X	X		1424	X		
18	RP0187-WCA1	X	X	X	1520	X		
19	RP0187-WCA2	X	X	X	1520	X		
20	RP0187-WCA3	X	X	X	1520	X		
21	RP0187-WCA1A2	X	X	X	1535	X		
22	RP0187-WCA1A3	X	X	X	1535	X		
23	RP0187							
24	RP0187							
25	RP0187							
26	RP0187							
27	RP0187							
28	RP0187							

Relinquished By: Ben Cohen Date: 02-19-10 Time: 1:30 Signature: [Signature]  
 Name & Company: Ben Cohen Date: 02/19/10 Time: 1:30 Signature: [Signature]  
 Signature: [Signature] Date: 02/19/10 Time: 1:30 Signature: [Signature]  
 Signature: [Signature] Date: 02/19/10 Time: 1:30 Signature: [Signature]

440-261188 Chain of Custody

**NEC**  
 44-1441-09  
 SITE ID: RP0187  
 BOXES: 1 of 2  
 440-261188 440-261319

CHAIN OF CUSTODY PAGE 2 OF 2

SAMPLES RETURNED TO:  
 EPI GLOBAL  
 3450 PYRITE STREET  
 RIVERSIDE, CA 92509

PROJECT NAME:  
 EXIST. RESIDENTIAL PROPERTY SOIL ASSESSMENT  
 SAMPLES FROM THE FOLLOWING WORK ORDERS ARE TRANSPORTED UNDER THIS CHAIN OF CUSTODY.  
 INDIVIDUAL WORK ORDER CHAIN OF CUSTODIES ARE INCLUDED IN THE ASSOCIATED SAMPLE BOXES.

440-261188	
440-261189	
440-261190	
440-261319	
440-261351	
440-261359	
440-261363	

Relinquished by: Name: Ben D. Hoon Signature: [Signature] Date & Time: 9/29/21 7:00  
 Location: Custody Custody seals: \_\_\_\_\_

Relinquished to: Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date & Time: \_\_\_\_\_  
 Location: \_\_\_\_\_ Custody seals: \_\_\_\_\_

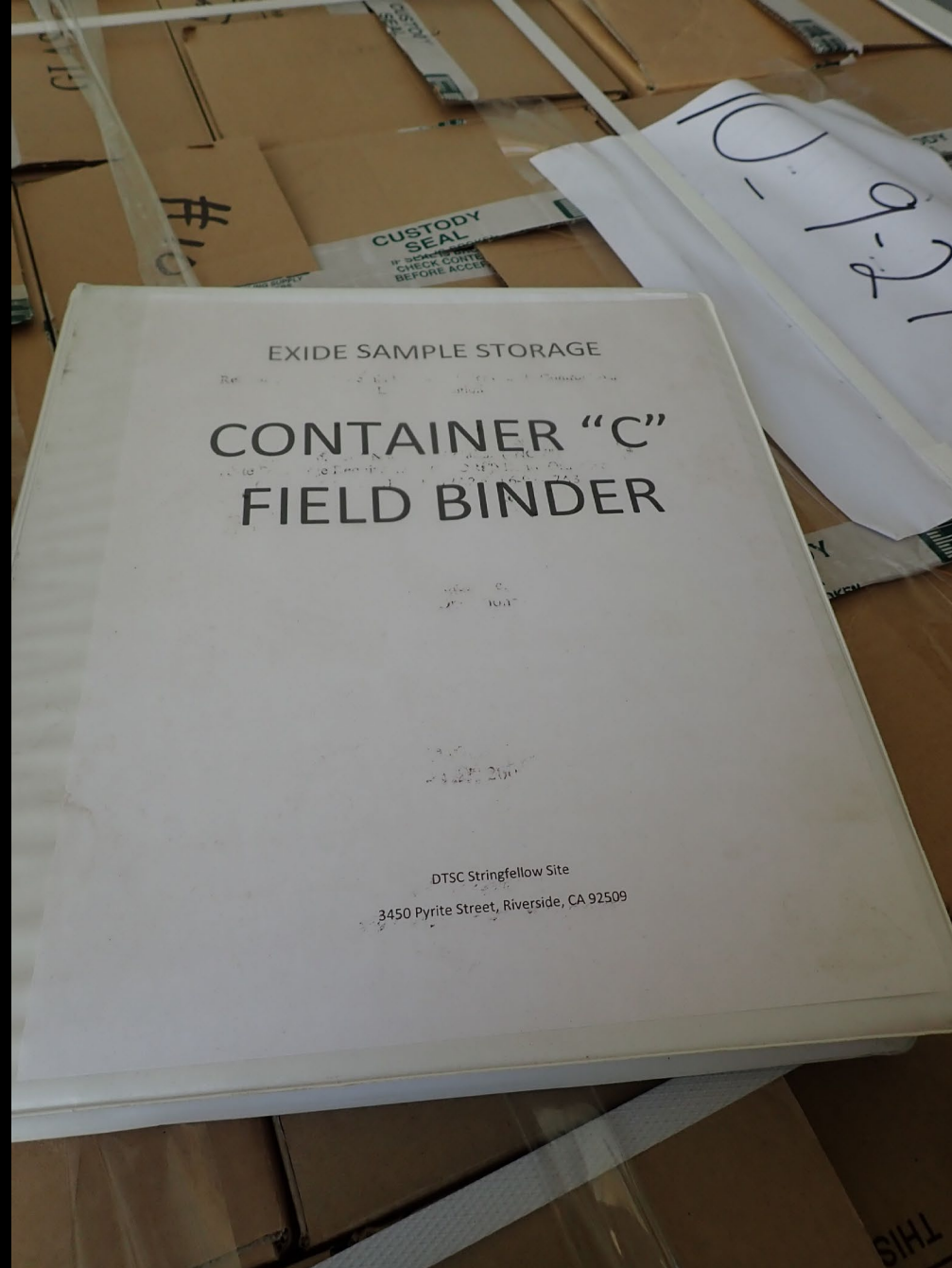
Relinquished by: Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date & Time: \_\_\_\_\_  
 Location: \_\_\_\_\_ Custody seals: \_\_\_\_\_

Relinquished to: Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date & Time: \_\_\_\_\_  
 Location: \_\_\_\_\_ Custody seals: \_\_\_\_\_

P6140035



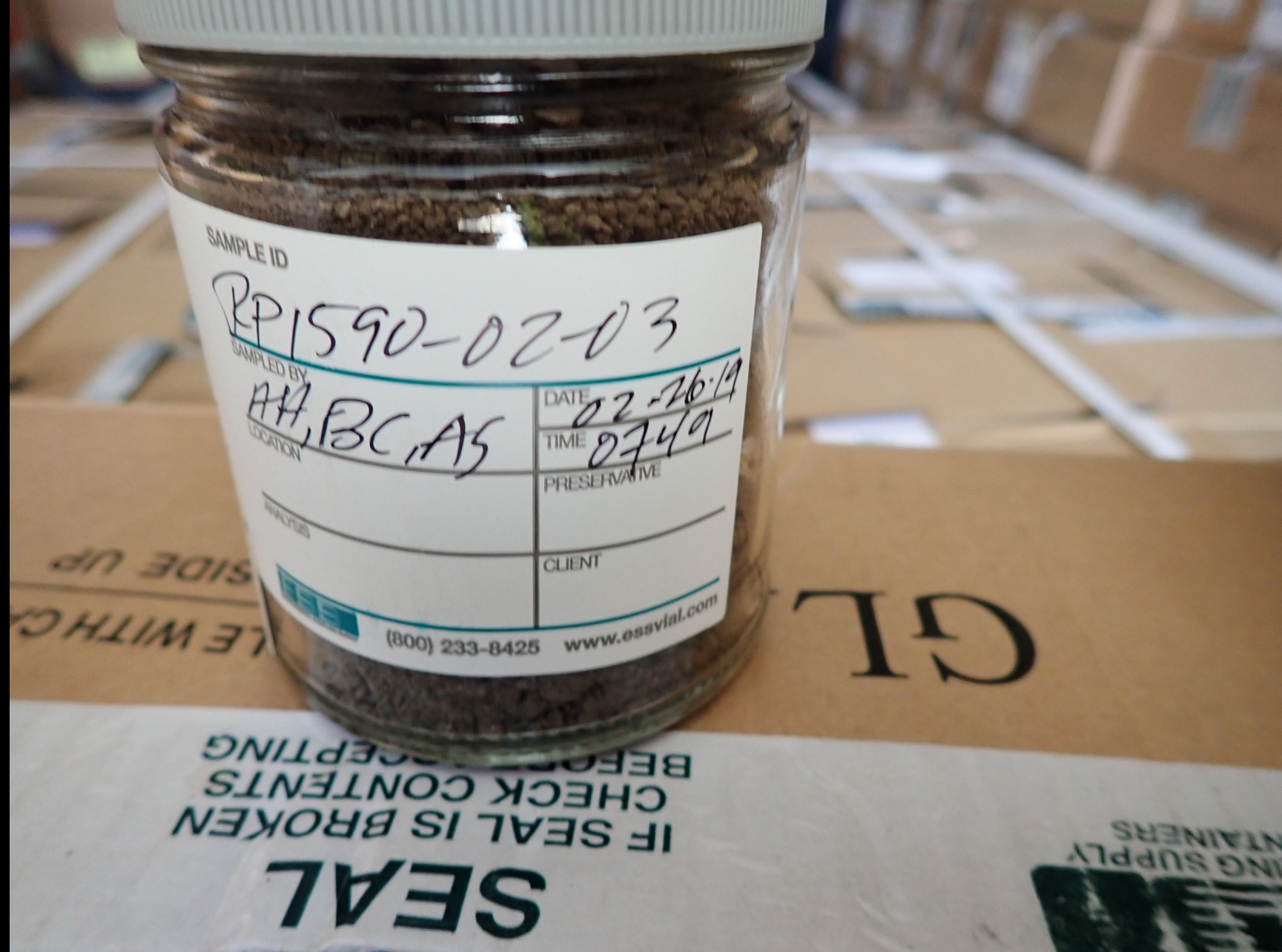
P6140036



P6140037



P6140038



P6140039



P6140040



P6140041



P6140042



P6140043

BOX	
B	RP 2714 (15)
	RP 2706 (19)
	RP 2711 (37)
	RP 2416 (3)
	RP 2358 (13)
	RP 2729 (23)
	RP 2726 (20)
	RP 2355 (14)
	RP 2667 (21)
	RP 2615 (22)

P6140044



P6140045



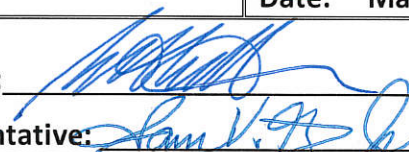
## Department of Toxic Substances Control

Matthew Rodriguez  
Secretary for  
Environmental Protection

Barbara A. Lee, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200

Edmund G. Brown Jr.  
Governor

### EXIDE PROJECT STANDARD OPERATING PROCEDURE

<b>Subject:</b> Exide Sample Retention and Management at DTSC Stringfellow Site	<b>Developed By:</b> DTSC Exide Corrective Action and Data Management Unit
<b>Supersedes:</b> N/A	<b>Date:</b> May 3, 2018
<b>Approved By:</b>	
<b>DTSC Exide Representative:</b> 	<b>Date:</b> 5/17/18
<b>DTSC Stringfellow Representative:</b> 	<b>Date:</b> 5/17/18

#### 1.0 PURPOSE

This Standard Operating Procedure (SOP) specifies the procedures and requirements for retention and management of samples associated with the former Exide Technologies, Inc. (Exide) lead-acid battery recycling facility in Vernon, California (hereafter, "former Exide Facility" or "Exide") project at the Department of Toxic Substances Control (DTSC) facility at the Stringfellow Site in Riverside, California. Long-term storage of soil samples collected from residential properties in the Preliminary Investigation Area (PIA), and potentially other locations, is required under the Exide Litigation Hold. Stringfellow Site has been identified as secure, long-term storage area and is being prepared for receipt and storage of approximately 59,000 soil samples that were previously stored at DTSC Environmental Chemistry Laboratory (ECL), DTSC contractor, and subcontract laboratory facilities.

#### 2.0 APPLICABILITY

This SOP is applicable to any DTSC employee who is involved in the retention or management of Exide samples in DTSC's possession that are, or will be, retained in DTSC's Exide sample storage facility at the Stringfellow Site.

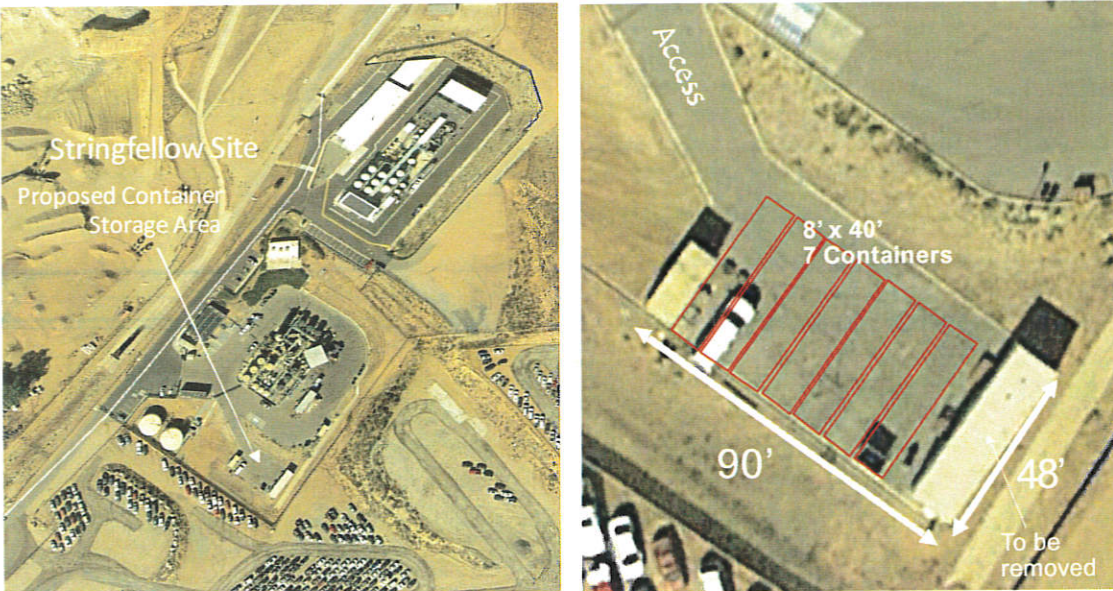
#### 3.0 AUTHORITY

The procedures specified in this SOP were developed in consideration of legal requirements associated with the Exide Litigation Hold and DTSC's access and safety requirements at the Stringfellow Site. All personnel involved in Exide sample retention and management at the Stringfellow Site must strictly adhere to the access and safety procedures in this SOP.

#### 4.0 DESCRIPTION OF STORAGE AREA

The Stringfellow Site is located at 3450 Pyrite Road in Riverside, California. The area designated for Exide sample storage is in the south corner of the treatment operations area. The storage

area is paved and measures approximately 90 feet long by 48 feet wide, with a paved access route from the northwest. An office trailer is located at the east side of the storage area. This trailer may be removed at some time in the future and a similar trailer, which is now located on-site, may be relocated here. The storage area location is shown below, along with the anticipated configuration of 40-foot by 8-foot shipping containers that will be purchased to store the samples (note that the image shows the configuration of 7 containers, but only four were purchased in March 2018). (Note: the photo below misstates the trailer will be removed.)



## 5.0 POINTS OF CONTACT

The table below identifies points of contact for Exide sample storage at the Stringfellow Site.

Name	Role	Phone (office)	Phone (mobile)	Email Address
Peter Ruttan	Project Manager (PM)	(916) 255-3777	(916) 701-3519	<a href="mailto:Peter.Ruttan@dtsc.ca.gov">Peter.Ruttan@dtsc.ca.gov</a>
Joel Bauman	Alternate PM	(916) 255-3630	(916) 823-7345	<a href="mailto:Joel.Bauman@dtsc.ca.gov">Joel.Bauman@dtsc.ca.gov</a>

Sam Martinez	Site Manager - Primary Site Contact	(916) 255-6548	(916) 390-3604	<a href="mailto:Sam.Martinez@dtsc.ca.gov">Sam.Martinez@dtsc.ca.gov</a>
Piotr Kostecki	On-Site DTSC Engineer - Secondary Site Contact	(951) 360-6450	(951) 205-7365	<a href="mailto:Piotr.Kostecki@dtsc.ca.gov">Piotr.Kostecki@dtsc.ca.gov</a>
To Be Determined	Sample On-site Storage Manager	Staff will be identified and receive appropriate training before conducting on-site work		
To Be Determined	Sample Manager	Staff will be identified and receive appropriate training before conducting on-site work		

## 6.0 PROCEDURES

The following sections describe the procedures for access to the Exide sample storage area at the Stringfellow Site; consolidation of Exide samples at the long-term storage area; and management of the Exide samples after their consolidation at the long-term storage area.

### 6.1 Access to Exide Sample Storage Area at the Stringfellow Site

DTSC staff supporting the Exide project must be aware of the following access procedures and requirements at the DTSC Stringfellow Site. DTSC Exide project staff shall notify the Stringfellow Site Manager, Sam Martinez, two business days in advance of arrival on-site.

1. The DTSC Stringfellow project staff are not responsible for retrieving, categorizing, organizing, or managing the Exide samples.
2. DTSC Exide project staff may have access to the sample storage area from 8:00 a.m. to 3:00 p.m. on Monday through Friday.
3. Required personal protective equipment (PPE) at the Stringfellow Site consists of
  - steel-toed boots,
  - hard hat,
  - safety glasses, and
  - a safety vest/jacket.
  - No shorts, skirts, kilts, tank tops, or halter tops are allowed;

Stringfellow Site is an operating remediation facility and these requirements are a part of the site-wide safety plan. DTSC Exide project staff shall prepare and follow a separate Hazard Appraisal and Recognition Plan (HARP) specific to the PIA sample storage activities.

4. All DTSC staff who come to the site will need to be pre-identified, must be field certified, and are also required to complete site-specific training. DTSC Stringfellow staff will not monitor field certification (e.g., HAZWOPER and medical clearance) of DTSC Exide project staff. Valid field certification of staff is the responsibility of the Corrective Action and Data Management Unit supervisor.
  - a. A list of DTSC Exide project staff with valid field certification will be prepared and a copy will be on file with the Stringfellow Security Office. Staff not on the list will not be allowed on-site. The Security Office will also maintain an access

- badge for DTSC Exide project staff on the list; the badge must be returned to the Security Office prior to departing the site.
- b. Project Manager or Alternate Project Manager will present a list of DTSC Exide project staff who will attend the site-specific training at Stringfellow. Upon completion of the training the Stringfellow Site Manager will provide a list of staff who attended and completed the training.
  - c. Site-specific training will consist of:
    - i. Brief history of the Stringfellow Site;
    - ii. Viewing of Stringfellow safety video;
    - iii. Site tour to identify areas that are off-limits, and the access route to Sample Storage area; and
    - iv. Summary of the access procedures presented and issuance of an identification badge by Stringfellow Security, to be kept on-site.
  - d. Refresher training or training for new employees will be given on an as-needed basis.
5. DTSC Exide project staff will only be allowed to access the storage containers and can access the containers by walking directly from the Security Guard office to the storage area. When needed, DTSC staff can access restrooms in the Administration Building located to the north of the Security Guard Office. DTSC Exide project staff will only be allowed to park in the designated areas. DTSC Exide Staff will not be allowed in Zone 1, or any of the areas where treatment or storage of groundwater, or storage of treated effluent occurs. These areas will be shown to staff during the site-specific training. If DTSC Exide staff enter areas where they are not authorized, they will be escorted from the site and not allowed to return. The access route and designated areas are shown on the figure at the end of this SOP.
6. A sample storage container access log (Access Log) will be located inside each storage container and must be completed by all personnel who access each container. The Access Log (template is included in Attachment 1) will serve as documentation of sample custody control. Personnel who unlock a sample container must record the following information on the Access Log:
- a. Date and time the storage container was unlocked;
  - b. All personnel who had access into the unlocked storage container (name and affiliation);
  - c. Reason for accessing the storage container;
  - d. Whether any samples were removed from the storage container (***note, samples must not be removed from storage without authorization and strict custody control measures***);
  - e. Any comments or observations noted during access; and

- f. Date and time the storage container was re-locked.
7. Keys to the storage containers will be maintained at the Security Guard office and can be checked out by authorized personnel for access into the containers. Keys checked out from the Security Guard office must be returned before leaving the Site.

## **6.2 Storage of All Exide Samples at One Location**

To date, approximately 59,000 soil samples have been collected by DTSC and its contractors (EFI, Arcadis, and Parsons) and are currently stored at multiple DTSC ECL, contractor, and subcontract laboratory facilities across the country. These samples, and potentially others as deemed necessary, will be transferred to one secure storage location in containers at the Stringfellow Site. This requires preparation of the storage area followed by receipt and processing of the samples, as described below.

### **6.2.1 Prepare the Storage Area**

DTSC will prepare the designated area for secure, long-term storage of the Exide samples by completing the following steps. Preparation is expected to be a one-time activity in the spring of 2018 and will involve contractors (i.e., container delivery and crane service providers) who will not return to the Stringfellow Site after completing their contracted activity.

1. DTSC has procured four storage containers for the Exide samples. These containers are refurbished steel shipping containers that measure approximately 40 feet long, 8 feet wide, and 8.5 feet tall. Each container will have four rows of 2-foot deep shelves on each side for sample storage, and a window with security bars on the end opposite the doors to allow for natural light.
2. The storage containers will be delivered to the Stringfellow Site. A member of DTSC Exide project staff (or a designated representative) will be on-site to receive delivery and direct the delivery truck to the off-load location. Delivery may take more than one day depending on availability of delivery trucks.
3. The storage containers will be placed into position. Due to the limited space available in the storage area, the delivery trucks will not be able to off-load the containers into their desired location. DTSC will contract a crane service provider to position the storage containers. A DTSC representative will oversee the positioning of the storage containers. The containers will be placed as close as possible in a side-by-side orientation, leaving enough room for access to the office trailer on the east side of the paved area.
4. Storage containers and shelves will be identified using a 4-part alpha-numeric code. Each container and shelf will be marked with the corresponding identifier using signs, posters, paint, labels, or other permanent method.
  - a. The easternmost container (adjacent to the office trailer) will be identified as container A; the adjacent container to the west will be B, and so on.
  - b. Shelves within the containers will be identified with a 3-part code:

- i. Shelf section, beginning with the section to the left of the container opening and continuing clockwise around the interior of the container. If there are 10 shelf sections on each side of the container, the section to the left of the container opening (when facing into the container) would be "1" and the section to the right of the opening would be "20".
    - ii. Shelf level, with Z being the floor, Y being the lowest shelf, X being the second lowest shelf, and so on.
    - iii. Consecutive number of boxes stored on the specific section and shelf level.
  - c. Example storage location codes are:
    - i. A-2-X-6 = Container A (easternmost), second shelf section clockwise from the left of the opening, second shelf up from the floor, sixth box.
    - ii. D-14-Z-3 = Container D (fourth from the east), fourteenth shelf section clockwise from the left of the opening, floor level, third box.
- 5. Each storage container will be equipped with a heavy duty, weather resistant, like-keyed padlock. At least two copies of the key will be kept in the Stringfellow Security Guard office.

#### **6.2.2 Receive and Process Samples at the Storage Area**

When the storage area is prepared, DTSC will receive delivery of the Exide samples from other DTSC, contractor, and subcontract laboratory facilities with a chain-of-custody (COC) document. Samples will be processed by documenting the identification of every sample received and storing the samples on the container shelves in an organized and searchable system. Sample custody and integrity is of utmost importance and must be ensured at all times. DTSC will receive and process the Exide samples by completing the following steps.

1. A DTSC Exide project staff member must be on-site to accept and sign for sample delivery. Samples are anticipated to be delivered in bulk shipments by commercial delivery service (e.g., FedEx, UPS) or by DTSC staff, contractor, or subcontract laboratory personnel.
2. Upon receipt, DTSC Exide project staff will evaluate the size and organization of the shipment. All samples must be secured inside the storage containers before DTSC staff leaves the storage area for any period of time. If the entire shipment cannot be processed before the departure of DTSC Exide project staff, the shipment must be secured inside a storage container(s) for processing at a later time. Large shipments may take multiple days or multiple teams to process.
3. DTSC Exide project staff will process the samples as follows:
  - a. DTSC Exide project staff must check every sample against the COC form that accompanied the sample shipment. DTSC will request the COC in both electronic and hard copy. This check must be completed at the earliest opportunity. Any discrepancies between the COC and the physical samples (for example, missing

or extra samples, or jars that are broken or empty) must be documented and communicated to the DTSC Project Manager no later than the end of the workday. Staff completing the COC check should mark sample check-in and discrepancy notes on the electronic COC file. If a photocopy of the COC is used in the field for sample check-in, the information recorded on the field version must be incorporated into the electronic COC file. The check-in notes should be provided to the DTSC Project Manager at the earliest convenience and must be retained for the project record.

- b. DTSC requested that sample jars are delivered in, and should continue to be stored in, cardboard boxes. However, jars may arrive in tubs, coolers, or other packaging, in which case the jars may remain in the original container or be transferred into cardboard boxes. After checking the individual samples against the COC, the box (or packaging) should be labeled according to its contents and location within the storage containers and sealed with a signed custody seal. The box label should identify the party who collected the samples (i.e., DTSC, EFI, Arcadis, Parsons, or other) and the alpha-numeric storage location code (i.e., A-2-X-6; see above). A self-adhesive label template is provided in Attachment 1.
  - c. For each individual sample, the alpha-numeric storage code for its box must be noted on the COC (or other tracking sheet). This is critically important, as this is how individual samples will be cataloged for future retrieval, if necessary.
4. The DTSC Sample Manager will use the sample receipt and processing information to develop a database of which Exide samples are stored at the Stringfellow Site and where each sample is located using the alpha-numeric code described above. The sample storage information should also be incorporated into the Exide EQulS database.

### **6.3 Management of Samples at the Storage Area**

It may be necessary to retrieve Exide samples from the storage area for inspection or analysis. DTSC Exide project staff will manage samples at the storage area using the following steps.

1. The DTSC Project Manager and Site Manager must be notified in advance of any inspection or retrieval of Exide samples from the storage area.
2. DTSC Exide project staff who will retrieve samples from the storage area should consult with the Sample Manager and/or database to determine where the desired samples are located (i.e., which container and shelf).
3. All DTSC Exide project staff who access the storage containers must document their activity on the access log inside each storage container.
4. Sample jars, boxes, and containers must be left in an organized and secure condition in their designated locations before exiting and locking the containers.

## 7.0 QUESTIONS

Any questions regarding Exide sample retention and management at the DTSC Stringfellow Site should be directed to the DTSC Project Manager (Pete Ruttan), whose contact information is listed above.

## ATTACHMENTS

Attachment 1: Sample Container Access Log template

Attachment 2: Sample Box Label template

Figure showing authorized access areas for DTSC Exide staff

