

September 18, 2009

Robert L. Collings
Direct Dial 215-751-2074
E-mail rcollings@schnader.com

VIA EMAIL

Ms. Theresa Najita
Air Pollution Specialist
Air Quality Data Branch
Planning and Technical Support Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

**Re: Comment on Designation for the
South Coast - Los Angeles County and Design Value
2008 Federal Lead Standard**

Dear Ms. Najita:

Exide Technologies makes these comments for the record and requests amendments to the Design Value and record used for designation of the South-Coast – Los Angeles County area as nonattainment for the recently revised National Ambient Air Quality Standard (NAAQS) for lead (Pb).

Exide does not object to an initial designation of nonattainment of the new federal NAAQS based on readings of the monitors listed as the Exide Rehrig Pacific site on page 6 of your Staff Report after January 1, 2010. Current readings are averaging less than 0.5 micrograms per cubic meter, and readings for the 1st Quarter of 2010 are expected to be lower.

Exide believes that, since the monitor site used in the 1st Quarter of 2008 has not been approved for attainment designation, ARB should not use that data as a design value. ARB should not develop a design value until data is available after January 1, 2010 to provide a design value. This value is expected to be much closer to the NAAQS value.

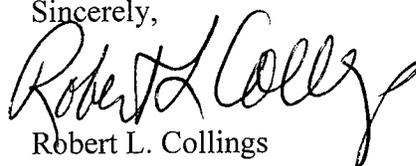
In any case, the use of the data from the 1st and 2nd quarters of 2008 would be incorrect, because at that time the monitors at that location were seriously out of compliance with applicable federal siting criteria (40 CFR Part 58 Appendix E) for lead monitors. The South Coast Air Quality Monitoring District has photographic and other records indicating that the monitor did not meet federal siting criteria, and the data was not used in reports to EPA. Copies of photographs presented in a hearing before the SCAQMD Hearing Board are attached to this comment. Additional records and testimony are available to show that the monitor was not approved for use in national standard designations in 2008, and would not be approvable at the location used during that time period. The monitor location had been moved by the site owner

Ms. Theresa Najita
September 18, 2009
Page 2

using a forklift, without notice to AQMD, in January of 2008. This was not discovered until May of 2008, at which time the monitor was moved to its current location.

Exide is working closely with AQMD to attain the new federal standard as quickly as possible at the relocated Exide Rehrig Pacific Monitoring Site. We are committed to that effort and to achieving and maintaining the new standard.

Sincerely,

A handwritten signature in black ink that reads "Robert L. Collings". The signature is written in a cursive, flowing style.

Robert L. Collings

Attachment