

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, July 11, 2012

From: Carter Williamson

Subject: ESB

1246 Allene Avenue and Neighboring Properties, Atlanta, GA

Latitude: 33.7167000

Longitude: -84.4008000

POLREP No.:	11	Site #:	A4AB
Reporting Period:		D.O. #:	0045
Start Date:	2/15/2006	Response Authority:	CERCLA
Mob Date:	2/15/2006	Response Type:	Time-Critical
Demob Date:	6/25/2009	NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	GAD078105749	Contract #	68-S4-02-04
RCRIS ID #:			

Site Description

The ESB, Inc., Site (Site), located at 1246 Allene Street in Atlanta, Fulton County, Georgia, is a defunct manufacturing facility which produced lead-acid automobile batteries from 1948 to 1988. Facility operations included casting lead alloys, producing oxides of lead, mixing lead pastes, and forming positive and negative battery plates. Manufacturing operations ceased in 1988. The Site, situated on 12 acres of land in a mixed-use zoning area in southwest Atlanta, Georgia is bordered by a railroad spur on the north, and residential properties on the west, southeast and south. The nearest residential property is located approximately 500 feet to the west of the facility. A child care center is located directly across the street from the facility to the west. It was alleged that during the manufacturing process, lead particles were released to the atmosphere via emissions from elevated roof stacks at the facility and impacted some of the surrounding properties.

In accordance with the AOC, EPA conducted a fund-lead, time-critical removal action at residential and commercial properties located in the immediate outside perimeter of the ESB facility. This cleanup action included the remediation of lead and arsenic from 48 residential yards and a ditch located downgradient and due north of the facility. Prior to remediation, lead contaminated soils in the yards and ditch revealed elevated lead of 500 mg/kg and 44,000 mg/kg, respectively.

An EPA Fund-lead, Time-Critical Removal Action was implemented at the Site to mitigate lead-contaminated soils identified at residential and commercial properties located in the immediate vicinity of the ESB facility. Lead contamination identified at the properties remediated during this action are suspected to have been directly impacted as a result of historical operations at the ESB facility.

As part of the Administrative Order on Consent for Removal Action (Order) for the ESB, Inc., Site and through a request of the Georgia Department of Natural Resources Environmental Protection Division (EPD), Exide Technologies has employed the services of AMEC E&I (AMEC) to perform quarterly groundwater sampling at the Site. As of September 2010, OSC Carter Williamson has overseen the activities associated with the ESB Site.

Current Activities

Activities conducted during this reporting period: AMEC has completed four quarterly sampling events and EPA and EPD have visited the site during one of these events to tour the abandoned facility and grounds and meet with AMEC personnel to discuss the future of the Site. At present, Exide, through AMEC continues to conduct quarterly groundwater sampling and provide the reports to EPA and EPD along with quarterly progress reports. Specific activities during this period include:

- June 1, 2011 - second round of quarterly sampling conducted by MACTEC.
- July 15, 2011 - AMEC E&I, Inc., (F/k/a MACTEC Engineering and Consulting Inc.,) issued a Groundwater Monitoring Report for the round of groundwater sampling performed in June 2011 to EPA

and EPD for review.

- August 30, 2011 - AMEC conducted quarterly groundwater sampling at the site.
- October 21, 2011 - AMEC submitted Groundwater Monitoring Report for the August 2011 sampling event to EPA and EPD.
- December 12-14, 2011 - AMEC conducted quarterly groundwater sampling at the site.
- January 24, 2012 - submitted Groundwater Monitoring Report for the August 2011 sampling event to EPA and EPD.
- February 15, 2012 - OSC Provides analytical results of January 2012 event to the Technical Services Section for review and to help determine next steps for the Site.

February 27, 2012 - Exide hosted a conference call with EPA/EPD to discuss the status of implementing the GW Investigation Work Plan approved by the EPD and to discuss the present status and negotiations for development between Exide and the development company that owns the property. Also discussed was community involvement. As of that conference call, no community activists/groups had been in contact with EPA and/or EPD with any issues related to the Site.

- March 12, 2012 - AMEC conducted 5th quarterly groundwater sampling event at the site.

April 18, 2012 - The Technical Services Section submits its findings from the January 24th GW Monitoring Report review which indicates that they concur with another four rounds of GW monitoring and that the possibility exists to install an additional temporary monitoring well down-gradient of the Site to determine if any off-site migration is occurring.

April 26, 2012 - OSC Williamson receives inquiry from EPA External Affairs that a citizen had contacted EPA about the growth of vegetation at the Site and that any vagrants/trespassers could not be seen on the property. OSC Williamson contacts the Exide representative to determine if Exide could assist in grubbing the site to appease the community. Exide's legal department would not agree to the maintenance of the property as they do not legally own it and requested that EPA contact the development company that retains ownership of the property to take the appropriate corrective action.

- May 3, 2012 - EPA Legal Counsel attempts to make contact with the owners of the Exide Site and is unsuccessful.
- May 16, 2012 - AMEC submitted the Groundwater Monitoring Report for the March 2012 sampling event to EPA and EPD.
- June 21, 2012 - AMEC conducted 6th quarterly groundwater sampling event at the site.

Planned Removal Actions

EPA and EPD continue to provide oversight of the ESB Site activities. Negotiations and development of the existing property between Exide Technologies and a development company located in California has been unsuccessful due to the housing crisis. As such, the future of the site and the abandoned facility remain in question. OSC Williamson and EPA Legal Counsel Kevin Beswick continue to work with Exide and AMEC and in coordination with EPD to address the security of the site and the growth of vegetation around the facility.

Next Steps

The results of the 5th Groundwater Sampling event conducted in March 2012, revealed that all total and dissolved metal concentrations were less than the laboratory reporting limits (RLs) in seven of the ten wells on the site. The current results indicate a general decrease in concentrations of the detected constituents since quarterly groundwater monitoring commenced in September 2010. Five of the eight planned quarterly sampling events have been completed. AMEC recommended, and EPA and EPD concurred, that three additional quarterly sampling events in June, September and December 2012. If lead concentrations in groundwater exceed 0.015 mg/l after eight quarters of sampling, then additional corrective measures/actions may be required.

AMEC will conduct additional quarterly groundwater sampling at the site in September and December 2012 and EPA/EPD will continue to work with Exide Technologies, AMEC and the property owner to bring a satisfactory resolution to the response/actions. .

Key Issues

Oversight and collaboration with EPD with regards to GW monitoring and the future of the clean-up and redevelopment of the Site

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