

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, May 29, 2013

From: Carter Williamson

Subject: ESB

1246 Allene Avenue and Neighboring Properties, Atlanta, GA

Latitude: 33.7167000

Longitude: -84.4008000

POLREP No.:	13	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 the eighth quarterly sampling event conducted at the former ESB, Inc., Site located on Allene Avenue in Atlanta, Georgia. The first groundwater monitoring event was conducted on September 1-2, 2010 and the eighth was conducted December 18-19, 2012. At present, Exide, through AMEC continues to provide quarterly progress reports to EPA and EPD. 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 it's 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 contact 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.

On September 24-25, 2012, AMEC conducts 7th quarterly sampling event at the site including discussions with OSC Williamson over recommendations submitted by EPA TSS Section to look at the installation of an additional GW monitoring well down-gradient from the site. Discussions also focused on Georgia Powers interest in remediating a small section of soil contaminated with low levels of PCB's. Report of sampling event submitted on November 19, 2012. A review of the groundwater monitoring data from this event indicates that all total and dissolved metals concentrations were less than the laboratory reporting limits in eight monitoring wells. Overall, the results indicate a general decrease in both the number of detected metals and their respective concentrations.

December 18-19, 2012: AMEC conducts the eighth and final groundwater monitoring sampling event. Groundwater samples collected from the ten monitoring wells during this event were analyzed for total and dissolved metals including antimony, arsenic, beryllium, cadmium, chromium, copper, lead, nickel, zinc and mercury. AMEC submits results to EPA and EPD on February 27, 2013 which shows that, overall, the results indicate a general decrease in both the number of detected metals and their respective concentrations. As a result, AMEC recommends further groundwater monitoring under a reduced scope consisting of semi-annual monitoring of two of the 10 wells for a period of two years to further evaluate concentration trends versus time and natural attenuation of metals impacts. AMEC also proposes to discontinue further monitoring of wells that have not shown more than one detection of dissolved metals above MCLs for at least six consecutive sampling events and re-evaluate soil risk reduction standards using site-specific soil and groundwater data to evaluate leaching to prepare an updated corrective action plan for soil.

March 21, 2013: OSC Williamson, along with EPA Attorney Kevin Beswick and Technical Services Section Chief Glenn Adams meet with EPD staff, AMEC and Exide representatives at the EPD office to discuss the future of the Site. Topics of discussion focus on the history of the Site, the EPA Consent Order, the Allene Avenue Redevelopment's (AAR) vision for the property, the results of the eighth round of groundwater monitoring/sampling, a new workplan and proposed next steps by Exide and legal site access.

April 2, 2013: Exide submits a summary document of the meeting to EPA and EPD for review. In the document, Exide proposes to use a combination of default or site-specific EPD risk reduction standards, potential deed restrictions, and alternate EPD programs to develop a remediation approach. The document also addresses Exide's interest into entering into a Voluntary Remediation Program (VRP) agreement with EPD. EPA and EPD agree with the proposed document but take exception to the language which references closing out EPA's Administrative Order when the VRP is entered into with EPD. EPA and EPD agree that the Order should remain in place until the Site is cleaned up to the satisfaction of EPA and EPD.

April 11, 2013: Exide submits Progress Report #111.

May 7, 2013: EPA, EPD, Exide and AMEC conduct a conference call to discuss the progress on the site and recent discussions with the owners of the facility and property itself. Highlights of the conference call indicated that the owner of the property is willing to cooperate with Exide and to place deed restrictions on the property if necessary for the selected remediation, that they will consent to entering into the VRP Program, grant access to the Site, and the owner wishes to sell the property and forego any re-development of the Site. Exide requests that they be granted an extension until June 12th to put forward a final remedy plan for the Site. EPA and EPD consent to the extension.

May 20, 2013: Exide submits Progress Report #112 for the month of April 2013 which details Exide's April 17th meeting with the owners of the ESB Site.

Planned Removal Actions

EPA and EPD continue to provide oversight of the ESB Site activities. OSC Williamson and EPA Legal Counsel Kevin Beswick continue to work with Exide and AMEC and in coordination with EPD to address the future of the site. On May 7, 2013, EPA, EPD, Exide and AMEC conducted a conference call to discuss the progress on the site and recent discussions with the owners of the facility and property itself. Highlights of the conference call indicated that the owner of the property is willing to cooperate with Exide and to place deed restrictions on the property if necessary for the selected remediation, that they will consent to entering into the VRP Program, grant access to the Site, and the owner wishes to sell the property and forego any re-development of the Site. Exide requests that they be granted an extension until June 12th to put forward a final remedy plan for the Site. EPA and EPD consent to the extension.

Next Steps

EPA approved an extension until June 12, 2013, for Exide to submit a final remediation plan for the Site. 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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