

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, July 25, 2008

From: Leslie Sims

Subject: Completion of ESI

ESB

1246 Allene Avenue and Neighboring Properties, Atlanta, GA

Latitude: 33.7167000

Longitude: -84.4008000

POLREP No.:	6	Site #:	A4AB
Reporting Period:	3/21/2008-6/30/2008	D.O. #:	0045
Start Date:	2/15/2006	Response Authority:	CERCLA
Mob Date:	2/15/2006	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		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.

Refer to previous POLREPs for more detail regarding site history and activities conducted prior to this reporting period.

Current Activities

March 2008

At the request of the 12th District City Council, representatives from EPA, EPD, Exide, and Junction Street Redevelopment Company attended the monthly community meeting to update residents on the status of the residential fund-lead and ESB enforcement-lead removal actions.

April 2008

At the request of property owners located at 1173, 1179 and 1181 Allene Avenue, EPA performed a removal assessment, consistent with the EPA-established site-specific sampling plan. At the request of the property owner located at 1181 Allene Avenue, additional sampling was performed at the right-of-way located in front of the property. Although the property was included in a previous sampling investigation, it was unclear from prior sampling data if the right-of-way was included in the survey. XRF reading for total lead at the 1181 Allene right-of-way exceeded the residential removal action level (RAL) established for the Site. The laboratory results for total lead detected in samples collected at 1179 Allene exceeded the residential RAL. The laboratory results for total lead detected in samples collected at 1181 Allene were below the residential RAL.

Accompanied by Superfund Director Franklin Hill and OSC Les Sims, Environmental Justice Director Charles Lee and Staff, visited the Site. The Director was updated on the status of the residential cleanup and informed that EPA was awaiting the PRP's completion of the RAP to begin the enforcement-lead cleanup at the ESB facility.

May 2008

In response to the high levels of lead detected in a ditch located due north of the ESB facility, EPA

mobilized START to collect soil samples at the location to delineate the extent of contamination. During that sampling event, lead was detected in soils at several locations along the ditch at levels significantly above the industrial RAL, ranging as high as 80,000 mg/kg total lead.

June 2008

In response to the elevated lead levels detected during the previous month's sampling event at the industrial ditch area, EPA mobilized START back to the ditch area to perform an expanded site investigation (ESI) to determine the nature and extent of contamination. The target sampling area included a two acre wooded corridor bounded by Sprint Communications to the west, Dane Trailer Company to the east, Capitol View Apartments to the north and an active CSX railroad line and the Exide Site to the south. A total of 16 surface soil samples were collected during the ESI, including one duplicate, and 6 sediment samples for confirmatory analysis. The analytical results of the soil and sediment samples were compared to the site-specific RAL for lead (800 mg/kg total lead). Total lead was detected in surface soil and sediment samples at concentrations exceeding the site-specific RAL and ranged from 1,950 mg/kg to 40,000 mg/kg.

Samples collected from Sprint Communications' retention pond were below the industrial RAL and significantly below down-gradient contamination levels, indicating it is likely not a primary source of the lead contamination found in the ditch. One composite soil sample, consisting of soil collected from all sampling locations where XRF screening concentrations exceeded the Site-specific RAL, was analyzed for lead using the Toxicity Characteristic Leaching Procedure (TCLP) to determine whether the lead waste met the criteria needed to carry a hazardous waste code under RCRA, 40CFR Part 261.24. TCLP concentrations contained lead at 2,930 milligrams per liter (mg/L), which exceeds the TCLP regulatory limit of 5 mg/L for lead.

Based on the analytical results from the sampling events conducted on June 12 and 13, 2008, as well as from previous investigations, lead is present above the Site-specific RAL in the industrial ditch area, which may receive runoff from the ESB facility as well as indeterminate sources. Lead was detected above the Site-specific RAL in soils largely at or near the surface and as deep as 3.5 feet below ground surface at the bed of the ditch. The location of the contaminated soils in the drainage ditch and its non-native composition, in comparison to surrounding terrain, suggests the possibility of migration.

Planned Removal Actions

EPA will continue fund-lead removal action activities to include the removal of the newly discovered elevated lead contamination.

EPA will continue to work with Exide in completing the final RAP to begin enforcement-lead removal action activities at the ESB property.

Next Steps

Fund-lead removal action activities as referenced above will begin within 30 days following the approval of the Action Memorandum Ceiling Increase.

Key Issues

Prior to the completion of EPA's initial residential removal action activities, owners/prospective purchasers of a parcel located due north of the ESB facility conducted a Phase I Environmental Assessment. The assessment identified elevated concentrations of lead in an earthen ditch located due west of the Dane Trailer Company property. Given the elevated concentrations of lead detected in the ditch, and its contrasting composition to surrounding terrain, EPA was asked to consider the ditch as part of the EPA removal action activities at the ESB Site. Review of historical documents, sampling data and a preliminary pathway analysis conducted by EPA during the ESI suggest possible attribution between the lead contamination in the ditch and the ESB facility via a underground drainage line which outfalls to the ditch. Further analysis is planned to definitively identify if such a pathway exist.

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