



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III
STATEMENT OF BASIS
EXIDE PITTSBURGH SERVICE CENTER
601 MAYER STREET
BRIDGEVILLE, PENNSYLVANIA
EPA ID NO. PAD 097130157

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I. Introduction

A. Facility Name

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Exide Pittsburgh Service Center facility located at 601 Mayer Street, Bridgeville, PA 15017 (hereinafter referred to as the Facility).

The Facility is subject to the Corrective Action program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k. The Corrective Action program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

B. Proposed Decision

This SB explains EPA's proposed decision that there are no current or unaddressed releases of hazardous waste or hazardous constituents from the Facility. Therefore, no further corrective action or controls are required at the Facility at this time. EPA's proposed decision is based on a review of EPA and Pennsylvania Department of Environmental Protection (PADEP) files regarding the environmental history of the Facility as presented in the Final Environmental Indicator Inspection Report submitted in September 2009.

C. Importance of Public Input

Before EPA makes a final decision on its determination for the Facility, the public may participate in the remedy selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains the complete set of reports that document Facility conditions, including a map of the Facility, in support of EPA's proposed decision. EPA encourages anyone interested to review the AR. The AR is available for public review at the EPA Region III office, the address of which is provided in Section V, below.

EPA will address all significant comments received during the public comment period. If EPA determines that new information or public comments warrant a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will approve its final decision in a document entitled the Final Decision and Response to Comments (FDRTC).

II. Facility Background

The former Exide Pittsburgh Service Center property (Exide) is located in Bridgeville, Allegheny County, Pennsylvania. The land area is approximately 0.5 acre in size and contains the 4,800-square foot building. Exide leased the building for warehousing, sales, and service of industrial lead acid batteries and storage of associated charging equipment. Wastes generated at the facility included wastewater containing trace amounts of sulfuric acid, a lead and iron sludge, and spent batteries.

III. Summary of Environmental History

A. Notification

Exide's first Notification of Hazardous Waste Activity was received by the United States Environmental Protection Agency (USEPA) on August 18, 1980. Exide applied for a Part A Hazardous Waste Permit on November 14, 1980, which noted estimated quantities of 28,600 pounds per year of D002 (corrosive) waste and 91,000 pounds per year of D008 (lead) waste. USEPA conducted hazardous waste inspections at Exide in 1982 and 1984. It was reported that the facility did not store or treat waste for longer than 90 days. No hazardous waste was disposed of onsite, as reported in 1981. Exide submitted to USEPA a request for withdrawal of the Part A application in March 1984. In that letter, the facility described its activities, which consisted of discharge of treated water and recycling of scrap material/sludge.

No documented spills or incidents were reported for the property.

Exide was assigned USEPA ID No. PAD097130157. The process codes identified for the facility on the Part A permit application were S01 (storage, container) and T01 (treatment, tank). The facility received initial qualification for interim status from the USEPA on December 12, 1980. On July 21, 1981, the interim status permit allowed the use of the S01 process (with a design capacity of 220 gallons) and a T01 treatment (with a capacity of 68 gallons per day), for the handling of hazardous wastes.

On November 30, 1981, the Pennsylvania Department of Environmental Protection (PADEP)

notified the Allegheny County Health Department (ACHD) and Collier Township about all hazardous waste facilities within their municipality, including Exide.

The USEPA reviewed the Exide facility on February 6, 1984 and found that the facility did not store or treat hazardous wastes for more than 90 days. Accordingly, the facility submitted to USEPA a request for withdrawal of its Part A application on March 1, 1984. USEPA received a letter from Exide dated August 25, 1986 noting that they had filed the Part A application as a protective measure under the Resource Conservation and Recovery Act (RCRA). The letter from Exide also explained that because the batteries were regenerated or recycled and their battery acid wastewater was treated to meet the POTW's pretreatment standards, that their waste stream was exempted from RCRA regulations.

B. Description of Solid Waste Management Units (SWMUs) or Areas of Concern

Two SWMUs were identified at the Exide Bridgeville facility: 1) the outside scrap battery storage area and 2) the wash tank. The following is a description of these former SWMUs.

Outside Scrap Battery Storage Area (SWMU No. 1)

The outside scrap battery storage area was located adjacent to the western side of the rear overhead door. The size of the area is not known. The area was not in existence during the PA site visit in 1990 and it was not noted during subsequent inspections. The scrap batteries were presumed to having been transported to the off-site recycler. The storage area was first used when the facility began operations in 1980.

Wash Tank (SWMU No. 2)

A 150-gallon, steel tank was used as a wash tank to clean batteries. The tank was located beneath the sulfuric acid drums which were stored on racks near the eastern wall of the building. The steel tank was placed closer to the central portion of the eastern half of the building in front of the rolling door at the street-side of the building. The wash tank acted as secondary containment for the drums when it was not being used to clean the batteries. The wastewater discharge sump was located further south, between the wash tank and the rolling door. This tank was used for washing batteries with water and detergent. During the washing process, small amounts of sulfuric acid accumulated in the water. The wastewater was neutralized and clarified in the tank, leaving a lead and iron sludge. The sludge was stored in the wash tank until removal by scrap dealers. The wash tank was first used when the facility began operations in 1980. It was cleaned up in 1988 when Exide relocated. The tank was not in existence during the PA site visit in 1990.

C. Remedial Action to Date

No information regarding any release controls or history of releases is available. No evidence of spills or releases was observed during the site visit in 1990 or the site visit in July 2009. The regulatory files show no documented spills or incidents were reported for the property. Exide operated the facility between 1980 and 1988. Before relocating operations to Vista Park Drive, Pittsburgh, Exide initiated a comprehensive cleanup of the building. A Pennsylvania environmental contractor was hired by Exide to oversee housekeeping clean-up efforts within the building.

IV. Evaluation of EPA's Proposed Decision

EPA's proposed decision that no further action or controls are needed at the Exide Pittsburgh facility is protective of human health and the environment. EPA's proposed decision represents a "Corrective Action Complete without Controls" as described in EPA Guidance found in the Federal Register / Vol. 68, No. 37 / Tuesday, February 25, 2003 / Notices [FRL – 7454-7] pages 8757 to 8764.

V. Public Participation

Interested persons are invited to comment on EPA's proposed decision. The public comment period will last thirty (30) calendar days from the date that notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Mr. Grant Dufficy at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Grant Dufficy at the address listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all information considered by EPA when proposing a Corrective Action Complete without Controls determination for the Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Mr. Grant Dufficy (3LC30)
Phone: (215) 814-3455
Fax: (215) 814 - 3113
Email: dufficy.grant@epa.gov