



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

C&D Technologies, Inc.

82 East Main Street
Leola, PA 17540

PAD 056771405

Prepared by
RCRA Corrective Action Branch 2
Land, Chemicals, and Redevelopment Division
August 2019

Table of Contents

Section 1: Introduction.....	1
Section 2: Facility Background.....	1
Section 3: Summary of Environmental History	2
Section 4: Environmental Indicators	4
Section 5: Public Participation.....	5
Attachment A: Index to Administrative Record	6
Figure 1: Map of Facility	7

Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the C&D Technologies, Inc. facility located at 82 East Main Street, Leola, Pennsylvania (hereinafter referred to as the Facility or Site). EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, EPA's proposed decision is that no further investigation or cleanup is required. EPA has determined that its proposed decision is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time. This SB highlights key information relied upon by EPA in making its proposed decision.

The Facility is subject to EPA's 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. §§ 6901 et seq. (Corrective Action Program). 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. The Commonwealth of Pennsylvania (Commonwealth) is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the Commonwealth for the Corrective Action Program.

EPA is providing a thirty (30) day public comment period on this SB. EPA may modify its proposed remedy based on comments received during this period. EPA will announce its selection of a final remedy for the Facility in a Final Decision and Response to Comments (Final Decision) after the public comment period has ended.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating <https://www.epa.gov/hwcorrectiveactionsites/contact-information-corrective-action-hazardous-waste-clean-ups-delaware>.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed remedy is based. See Section 5, Public Participation, below, for information on how you may review the AR.

Section 2: Facility Background

The Facility property consists of approximately 17.4 acres and is located in an agricultural/residential/light industrial area. A map of the Facility is attached as Figure 1.

The Facility was used for the manufacture and storage of lead-acid batteries for the telecommunications industry between 1972 and 2012. The Site consists of two pieces of land,

Statement of Basis

Section 2: Facility Background (continued)

Tract 1 (north) and Tract 2 (south), and includes two buildings, Building A and Building B. Building A is located in Tract 1, and operations in this building included battery manufacturing. Building B is located in Tract 2, and it was a warehouse used for the storage and distribution of new batteries.

The property is currently owned by Dart Container Corporation (Dart), who purchased the property from C&D on April 5, 2013. At present, there are no ongoing battery operations at the Site.

Section 3: Summary of Environmental History

Site Wastes

The primary hazardous constituent at the Site was lead from the manufacturing processes. Lead-tainted wastewater primarily consisted of washdown of equipment, product and floors. This wastewater was treated on-site in a wastewater treatment system and then discharged to the public sewer. Other, untreated wastewater collected from the past mixing process was stored and subsequently transported off-site for treatment.

Additional lead-containing waste at the Site were dross, which is a by-product of the melting process, dust containing lead, and lead scrap. Lead-containing waste was collected, stored, and transported off-site to a smelter.

Solvents at the Site from laboratory processes and spent epoxy waste was stored outside in 55-gallon drums. Spent cooling oil and hydraulic oils were also stored in 55-gallon drums.

Releases and Remedial Actions

Historical releases of regulated substances have occurred at various times between 1982 and 1998. The releases are described below, as well as the immediate remedial activities performed.

1982 - Wastewater treatment system released approximately 6000 gallons of non-hazardous wastewater into the soil when a storage tank developed a leak. The tank was removed and 75cu yd soil was excavated. Monitoring wells MW-1, MW-2, and MW-3 were installed following this release to monitor groundwater.

1982 - A pipe connector ruptured, releasing 1800 gallons of wastewater consisting of boiler blowdown and waste oils. Approximately 0.37cu yd of soils were removed and monitoring well MW-4 was installed to monitor groundwater.

Statement of Basis

Section 3: Summary of Environmental History (continued)

1984 – Approximately 300-500 gallons of wastewater was released from a ruptured by-pass valve. The released entered the Facility's NPDES-permitted discharge ditch. Later, in 1986, another 50-100 gallons were released to the discharge ditch when a hose connector ruptured. At that time, some of the wastewater was recovered and the area was flushed with deionized water.

1988 – In two (2) events, lead oxide powder was released when being transferred to a storage silo. Approximately two (2) pounds total of lead was emitted in total. Remedial cleanup included vacuuming the impacted roof and pavement, cleaning nearby equipment, and wet-floor scrubbing on paved areas.

1988- A wastewater release outside of Building A was found to have elevated levels of lead in soil but not in groundwater. Cleanup involved removal of 71 tons of soil.

Site Investigations/Decommissioning

Tank Closures

1994 and 2002 – Closure was completed for a 1000-gallon gasoline underground storage tank (removed) and a 6000-gallon former wastewater underground storage tank (closed in place). No evidence of leaks or releases were found at these closures.

Soils

2012 and 2013 - During Site decommissioning, a 2012 soils investigation was conducted to evaluate potential presence of lead in soils within Building A and between Buildings A and B. This included areas for deliveries, equipment handling, storm sewer drainage, above ground tanks and underground tanks. A total of 129 samples from 61 soil boring locations as well as 11 other sampling locations, including sediments from the stormwater sewer line, were collected. Several surface and subsurface samples contained lead at concentrations above the direct contact and soil to groundwater Act 2 Statewide Health Standards (SHSs), particularly in the stormwater drainage ditch. An additional soil investigation in 2013 focusing on this impacted stormwater drainage ditch area. As a number of areas along the ditch were found to have elevated lead levels, soil was removed along the entire length and width of the drainage ditch, as well as the sediment from a collection sump near the railroad tracks.

Between 1982 and 2013, approximately 593 tons of material was removed and transported off-site for treatment. Post-excavation sampling confirmed soils did not show lead levels above residential and non-residential SHS at the Site.

Groundwater

In March 2013, five (5) on-site monitoring wells were installed, and groundwater samples were collected and analyzed for volatile organic compounds, semivolatile organic compounds, and metals. The only parameter to be detected at a concentration above the residential used-aquifer SHS in Site groundwater was dissolved lead (7.5 ug/l in MW-5). The Pennsylvania Act 2

Statement of Basis

Section 3: Summary of Environmental History (continued)

residential used-aquifer SHS for lead is 5 ug/l. EPA's drinking water standard for lead is 15 ug/l. Well MW-5 is located in the southwestern portion of Tract 1, near the stormwater drainage ditch and areas of previously excavated lead-impacted soil. Soil containing lead at concentrations above its residential soil SHS was excavated from the drainage ditch during previous remedial activities conducted at the Site (see above). Dissolved lead was not detected above the residential used-aquifer SHS in any other groundwater location.

In July 2013 and February 2014, groundwater was collected from on-site monitoring wells to further characterize and delineate dissolved lead detected previously in groundwater. During these monitoring events, lead was not detected in groundwater above the residential used-aquifer SHS at any location, including MW-5.

As there was one sample in early 2013 that showed a slightly elevated level of dissolved lead at MW-5, the Facility performed a Human Health Risk Assessment (HHRA) to evaluate potential risks associated with dissolved lead in groundwater at the Site. The site-specific HHRA was conducted to provide quantitative analysis of current and future on-site and off-site land use scenarios based on the nature of the dissolved lead detected in the groundwater, potential exposure pathways to human receptors, and the degree to which these exposures may pose adverse effects.

The Site and hydraulically downgradient properties have been commercially developed and, although future use of the Site for residential purposes is highly unlikely, the HHRA conservatively evaluated potential on-site and off-site residential exposure to dissolved lead in groundwater. The HHRA shows that there is no unacceptable risk to lead in groundwater for residential or non-residential land-use scenarios for the Site.

A report on the Site investigations and remedial work was submitted April 2014. PADEP provided Act 2 approval on July 09, 2014. No land-use or groundwater-use controls were required by PADEP.

Section 4: Environmental Indicators

EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. EPA has determined that the Facility met both the migration of contaminated groundwater under control indicator and the current human exposures under control indicator on January 08, 2001.

Section 5: Public Participation

Interested persons are invited to comment on EPA's proposed remedy. 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, or electronic mail to Linda Matyskiela at the contact information listed below.

A public meeting will be held upon request. Requests for a public meeting should be submitted to Linda Matyskiela in writing at the contact information listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed remedy at this Facility. The Administrative Record is available at the following location:

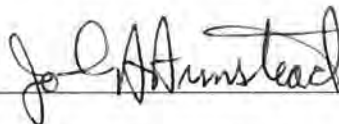
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Linda Matyskiela (3LD20)
Phone: (215) 814-3420
Fax: (215) 814-3113
Email: Matyskiela.Linda@epa.gov

Attachments:

Attachment A: Index to Administrative Record
Figure 1: Map of Facility

Date: _____

8.21.19



John A. Armstead, Director
Land, Chemicals, and Redevelopment Division
US EPA, Region III

Attachment A: Index to Administrative Record

C&D Technologies, Inc.
PAD 01 015 4045

Environmental Priorities Initiative, Preliminary Assessment of Eltra Corporation – C&D Batteries Division; NUS, dated September 13, 1989

Environmental Assessment Inspection Report; for C&D Technologies, Inc, Leola, PA; USACE, dated April 5, 1999

Remedial Investigation/Risk Assessment/Final Report for C&D Technologies, Inc; URS, dated April 2014

Statement of Basis

C&D Technologies, Inc. (Leola, PA)
PAD 05 677 1405

August 2019
Page 6

Figure 1

