



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

7017 0530 0000 1267 5116  
VIA EMAIL AND CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF

LU -16J

November 20, 2018

Walter E. Kozlowski  
Director, Environment, Health & Safety  
C&D Technologies  
200 West Main Street  
Attica, Indiana 47918

Re: Conditional approval of Termination of Area 9 SVE Operations  
C&D Technologies  
Attica, Indiana  
USEPA ID # IND000810754

Dear Mr. Kozlowski,

USEPA reviewed your request letter dated November 7, 2018 to terminate Area 9 soil vapor extraction (SVE) operation at the C&D Attica Facility located at 200 West main Street, Attica, Indiana. Table 2-1 and Table 2-2 of the Corrective Action Completion Determination Request document submitted on November 12, 2018 shows the SVE system performance data and residual soil contamination data for TCE and PCE respectively. The SVE performance data demonstrates the completion of remediation efforts associated with significant reduction of TCE and PCE in soil gas leading to acceptable inhalation exposure from vapor intrusion. However, the residual contamination in soil with in the SVE treatment area poses risk to industrial workers for direct contact in locations SB-105, SB-111 and SB-113 B. Particularly in location SB-113 B, the observed soil contamination is much higher than the previously reported level. It is not clear, if location SB-21B was sampled for confirmation sampling.

As the remediation effort to remove the contaminated soil vapors through SVE system has reached asymptotic levels and the continued operation of the SVE system is not likely to achieve any further reduction in constituent concentrations in soil, EPA approves the termination of the operation of the SVE system with a condition.

The condition pertains to residual surface soil contamination that may impact industrial worker or maintenance worker direct contact as well impact groundwater due to leaching. C&D should excavate and dispose soils contaminated with constituents of concern in excess of IDEM

industrial worker direct contact criteria. Any soil location with in Area 9 that exceeds IDEM groundwater protection criteria should be paved as defined in EPA's final decision document for the C&D facility.

C&D should submit an excavation and capping workplan as an addendum to the Corrective Action Completion Determination Request document with in 45 days of the receipt of this letter. Please contact me at [sundar.bhooma@epa.gov](mailto:sundar.bhooma@epa.gov) if you have questions regarding this letter.

Sincerely,

A handwritten signature in cursive script that reads "Bhooma Sundar".

Bhooma Sundar  
Project Manager  
Land & Chemical Division  
RCRA Corrective Action Section