

Summary of the Exide Consent Order and Agreement

Facility Facts

- Exide operates a secondary lead smelter in Muhlenberg Township and Laureldale Borough for the purpose of recycling used lead-acid batteries, battery parts and other lead bearing materials. Exide also operates a manufacturing and distribution facility for new lead-acid batteries at the same site.
- The recycling process includes the storage of used batteries and battery parts prior to reclamation, the collection and treatment of spent battery acid, and the generation of sludge from the emission control device for the secondary lead smelter.

Goals

- To evaluate the extent of soils containing total lead concentrations above EPA screening levels in the vicinity of the Facility.
- To determine safe clean up levels for lead in soil using EPA approved methods.
- To develop and implement appropriate clean ups.

Work To Be Performed

1. Exide has begun cleanup of 19 identified properties that have greater than 1,200 parts per million of lead in soil. The properties are located south of and adjacent to the Facility. The clean up is in accordance to PADEP Consent Order and Agreement and consists of removing the contaminated soil, backfilling with clean soil and restoring the properties.
2. In addition to the 19 properties, Exide will sample approximately 20 residential properties located just north of the Facility in Laureldale Borough. Properties with total soil lead concentrations exceeding 1,200 parts per million will be cleaned up. Properties with total soil lead concentrations between 400 and 1,200 parts per million will be retained for further evaluation.
3. Exide will submit an Assessment Work Plan to:
 - a. Take additional soil samples in Laureldale Borough and Muhlenberg Township. The supplementary data will be combined with existing soil data into a geostatistical model to determine areas that are not likely to exceed 400 parts per million for lead in soil. This will define the extent of contamination.
 - b. Properties within the extent of contamination will be individually sampled. A percentage of those homes will be analyzed for lead paint and house dust.
 - c. Determine the clean up level for lead in soil using EPA approved methods, which consist of the Integrated Exposure Uptake Biokinetic (IEUBK) Model for Lead in Children and EPA Adult Lead Model.
4. Exide will submit for EPA's review an Assessment Report that summarizes the

- implementation of the Work Plan, including the risk assessment. At this time cleanup levels for lead in soils will be selected.
5. After EPA's approval of the Assessment Report, Exide shall submit a Remediation Workplan for each property to be remediated.
 6. On residential properties, soil removal and restoration of the property will be implemented. After soil removal, Exide shall conduct confirmatory sampling to verify that each property achieved the cleanup level. For non-residential areas and in those areas that are heavily wooded or have steep slopes, Exide will submit for EPA's review alternative cleanups that may be more appropriate.
 7. Exide will provide public education on health hazardous of lead in soil and in the environment.