19

Battery Council International

WASHINGTON OFFICE:
Weinberg, Bergeson & Neuman
1300 Eye Street, N.W.
Suite 1000 West
Washington, D.C. 20005
(202) 962-8585/FAX (202) 962-8599

December 31, 1996

Via Hand Delivery

Mr. Michael Petruska
Waste Treatment Branch Chief (5302 W)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D C. 20460

Re: Comments on EPA's Final Draft Site Visit Report -- GNB Battery Technologies, Frisco, Texas

Dear Mr. Petruska:

Thank you very much for the opportunity to review the Draft Final Site Visit Report prepared to document EPA's visit to GNB Battery Technologies' Frisco, Texas recycling facility.

After a thorough review of this report by myself, Billy King and Richard Thompson, we request the following revisions:

- Revise page 1, paragraph 2 (Overview of Operations), as shown in Attachment A;
- Replace Exhibit 2 (GNB's Facilities in the U.S. and Canada), on page 2, with Attachment B;
- Revise page 4, paragraph 3 (Water Treatment), as shown in Attachment C; and
- Revise pages 4-5, (Slag Treatment Constraints), as shown in Attachment D.

Also, confidential treatment of the Final Draft Site Visit Report is not necessary and we further understand that it will be placed in the public docket for EPA's Phase IV rulemaking.

Thank you again for requesting our input. If you have any questions please call Ned Ferguson of Weinberg, Bergeson & Neuman at (202) 962-8584.

Sincerely,

Steve Emmons /sa

Steve Emmons
Environmental Manager,
GNB Battery Technologies and
Chair, BCI Environmental Committee

Attachments
cc: Mr. Richard Thompson
Mr. Billy King

Attachment A

Overview of Operations

GNB is an international battery manufacturing and recycling company ~~a national battery management company~~ based in Atlanta, Georgia. GNB operates several facilities throughout the nation (Exhibit 2) and employs 3,750 in recycling, manufacturing and distribution centers nationwide. GNB's operations are grouped under five ~~three~~ major divisions: ~~Automotive Battery Division, Industrial Battery Division, and Resource Recycling Division~~ Automotive Parts; Electric Vehicle; Power Control; Telecommunications; and Environmental Services. GNB's recycling facility in Frisco, Texas is ~~falls under the Resource Recycling Division and is a commercial lead acid battery recycling facility. GNB's Frisco facility is~~ located about 25 miles north of Dallas and occupies approximately 240 acres. The active area of the facility is approximately 50 acres. GNB acquired this site in 1964 to build an oxide plant, then added a recycling facility in 1971~~,~~ ~~and claims to be~~. It is the only battery recycling facility currently operating in the state of Texas. ~~Currently,~~ GNB employs 140 people at this facility. A layout of GNB's Frisco facility is provided in Exhibit 3.

Attachment B

Exhibit 2: GNB's Facilities in the United States

Automotive Parts	Electric Vehicle	Power Control	Telecommunications	Environmental Services
Atlanta, GA	Lombard, IL	Lombard, IL	Lombard, IL	Atlanta, GA
City of Industry, CA	Columbus, GA	Kankakee, IL	Fort Smith, AR	Mendota Heights, MN
Columbus, GA	Kansas City, KS			Frisco, TX
Dallas, TX				
Dunmore, PA				
Florence, MS				
Frisco, TX				
Los Angeles, CA				
Shreveport, LA				
Vicksburg, MS				
Flowood, MS				

Attachment C

Water Treatment

All acid from batteries and water from the scrubbers, along with gray water, cooling tower water, and other wash down water are treated in the on-site wastewater treatment plant and discharged to the city sewer system in accordance with local pretreatment permit requirements. ~~surface waters under the NPDES permit.~~

Attachment D

Slag Treatment Constraints

GNB claims that the blast furnace slag is highly variable ~~heterogeneous and therefore~~ with the metal levels in the slag varying ~~highly~~ significantly from batch to batch and even within a single batch. Informal sampling of pre-treatment slag conducted by GNB has resulted in a 50%-50% TCLP test pass/fail rate. GNB frequently conducts in-house sampling and analysis of the treated slag. Grab sampling data, provided by GNB, of the treated slag shows barium, lead, and selenium levels above the UTS levels. GNB also stated that ~~even after~~ "optimizing" the binder to waste ratio in the slag treatment system~~,~~ would not eliminate the ~~levels of~~ barium, lead, and selenium ~~in the TCLP leachate are present above~~ ~~the~~ spikes that would prevent industry compliance with the proposed UTS levels (using EPA SW-846). ~~about 50 percent of the time.~~