



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY
REGION III
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852**

SUBJECT: Long-Term Stewardship Assessment
SBD Property Holdings
Formerly Baldwin Hardware
EPA ID: PAD002350833
841 East Wyomissing Boulevard
Reading, PA 19607

DATE: 09/25/2023

TO: Alizabeth Olhasso, RCRA Corrective Action South Section Manager
Long Term Stewardship File for SBD Property Holdings
RCRA Corrective Action

FROM: Linda Matyskiela, Remedial Project Manager

Remedy Assessment Summary:

On July 18, 2023, the United States Environmental Protection Agency's (USEPA) Land, Chemicals, and Redevelopment Division (LCRD) representative, Linda Matyskiela, conducted a long-term stewardship assessment site visit of the SBD Property Holdings (Facility) in Reading, PA. The site was formerly known as Baldwin Hardware Corporation.

The information gathered concludes the Facility is meeting the objectives of USEPA's final remedy selected in the Final Decision and Response to Comments on August 24, 2017.

Introduction:

Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in twofold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance with the final decision.

Facility Background:

The site is a 28-acre property in Reading, PA, formerly occupied by Baldwin from 1956 to 2014. Manufacturing processes included metal plating and acid etching which produced hardware plated with chrome, bronze, brass, zinc and nickel. Manufacturing as well as vapor degreasing and wastewater treatment generated primarily metal wastes such as lead and nickel, and volatile organic compounds (VOCs) such as trichloroethylene (TCE).

The facility was comprised of three units: Central Unit, Lower Unit and Administration Unit. The Central Unit housed the majority of the manufacturing process. As the business expanded, additional buildings were added to the Central Unit, eventually numbering 1-12. The Lower Unit was used for storage, shipping and plating operations; buildings 50, 51, and 51A. The Central Unit is connected to the Lower Unit and together occupy 260,000 sq. ft. The Administrative Unit is a detached building which housed sales, marketing and engineering departments. No manufacturing operations were associated with this Unit.

In 1987, EPA issued an Administrative Order on Consent (AOC), which has now been superseded by EPA's Final Decision and Response to comments, selected on August 24, 2017. At the time of the AOC, the Facility was owned and operated by Baldwin, a wholly-owned subsidiary of the Masco Corporation (Masco). On September 30, 2003, The Black & Decker Corporation purchased the shares of Baldwin, which continued to own and operate the Facility as an indirect, wholly-owned subsidiary of The Black & Decker Corporation. On March 12, 2010, The Stanley Works acquired The Black & Decker Corporation and changed its name from The Stanley Works to Stanley Black & Decker, Inc. The Facility continued to be owned and operated by Baldwin, which was then an indirect, wholly-owned subsidiary of Stanley Black & Decker, Inc. On December 17, 2012, Stanley Black & Decker, Inc. sold the shares of Baldwin to Spectrum Brands, Inc. Immediately prior to the December 17, 2012 sale, Stanley Black & Decker, Inc. caused Baldwin to transfer title of the Facility to SBD, an indirect, wholly-owned subsidiary of Stanley Black & Decker, Inc., and for Baldwin to lease the Facility from SBD. Subsequently, SBD sold the Facility to TMAP Realty, LLC on July 1, 2015. Currently the Facility (buildings and parking lots) is used by a car dealership.

All media at the Facility were investigated and the following comprise the Final Remedy elements.

FINAL REMEDY DECISION 8/24/2017

1) Soils under Central Unit - As volatile organic compounds (VOCs) remain in soils under the Central Unit above levels appropriate for industrial and residential use, the Final Remedy requires actions to restrict activities that may result in exposure to those contaminants. The Final Remedy incorporates the existing floors in the Central Unit as a "cap" to eliminate exposures to trichloroethylene (TCE) remaining in the subsurface.

Remedy

A) Land use restrictions are required to prohibit residential uses. (*Implemented under 11/22/2019 Environmental Covenant*)

B) Building use restriction to prohibit use of Central Unit unless integrity of Unit floor is inspected and maintained. (*Implemented under 11/22/2019 Environmental Covenant*)

2) Indoor Air in Central and Lower Units- As elevated levels of VOCs remain in soil vapor under the Central and Lower Units, the Final Remedy requires that soil vapor mitigation systems (SVMS) be operated, maintained and monitored in buildings located above the Central and

Lower Units to meet EPA 's Indoor Air standards. In addition, the Final Remedy requires that a SVMS be installed in any new structures constructed above the Central or Lower Unit, unless is demonstrated to EPA that vapor intrusion does not pose unacceptable risk to human health and EPA provides written approval that no vapor control system is needed.

Remedy

A) Operate, monitor, and maintain the SVMSs as required by the EPA-approved *Soil Vapor Mitigation Systems Operation, Maintenance and Monitoring Plan*, dated May 2016, to ensure TCE is at or below 8 micrograms per cubic meter (ug/m3) in indoor air. *(Implemented under 11/22/2019 Environmental Covenant)*

B) No Facility building may be used or occupied unless such building has a SVMS system in operation, or unless it is demonstrated to EPA that operation of a SVMS is not needed in such building and EPA provides prior written approval to discontinue operation of the SVMS. *(Implemented under 11/22/2019 Environmental Covenant)*

C) Prohibit construction of new structures above the Central Unit and the Lower Unit unless a SVMS is installed in each such structure, or unless it is demonstrated to EPA that installation of a SVMS is not needed to protect human health and EPA provides prior written approval to not install a SVMS. *(Implemented under 11/22/2019 Environmental Covenant)*

3) Groundwater- Groundwater at the Facility contains VOCs above EPA's drinking water standards, Maximum Contaminant Levels (MCLs)

Remedy

A) Operation, monitoring and maintenance of a modified groundwater recovery and treatment (GWRT) system as stated in the EPA-approved *Groundwater Hydraulic Containment System Operation, Maintenance, and Monitoring Plan*, dated January 2016, and until TCE is at or below 5 micrograms per liter (ug/l) consistently in all wells. *(Implemented under 11/22/2019 Environmental Covenant)*

B) Compliance with, and maintenance of, groundwater use restrictions, including a prohibition on potable use of Facility groundwater, to prevent exposure to contaminants while levels remain above drinking water standards. *(Implemented under 11/22/2019 Environmental Covenant)*

4) Inspection and Maintenance- programs are required for

A) Central Unit floor *(Implemented under 11/22/2019 Environmental Covenant)*

B) SVMS *(Implemented under 11/22/2019 Environmental Covenant)*

C) GWRT System *(Implemented under 11/22/2019 Environmental Covenant)*

Abbreviations:

Soil Vapor Mitigation Systems (SVMS)

Groundwater Recovery and Treatment (GWRT)

OMM Plan (Operation, Maintenance, and Monitoring Plan)

Current Site Status:

SBD is in compliance with all activities and reporting requirements for the Final Remedy, for both the SVMS – the vapor mitigation system under the buildings, and the site-wide GWRT system – the groundwater pump and treat system. In an effort to improve efficiency of the GWRT system, the Facility has proposed temporarily reducing the pumping rate at the recovery wells to evaluate the effect on the groundwater capture zone. EPA has approved this proposal for one year and will assess the results at that time.

Long-term Stewardship Site Visit:

The attendees were:

Name	Organization	Email Address
Linda Matyskiela	US EPA Region 3	Matyskiela.Linda@epa.gov
Kelly Kincaid	PADEP	kkincaid@pa.gov
Jeanna Erickson	Loureiro	jmerickson@loureiro.com

Implementation Mechanism(s):

The Implementation Mechanism is the method for implementing IC and ECs required as a condition of the Statement of Basis and Final Decision. The summary of implementation mechanisms are described in Attachment 2.

Financial Assurance:

EPA has requested up-dated Cost Estimates for the vapor mitigation systems as well as the groundwater remediation system from SBD to determine if adjustments need to be made to the existing instruments.

Reporting Requirements/Compliance:

1. Submittal of required SVMS and GWRT system reports are in compliance with EPA's requirements.
2. Submittal of Environmental Covenant compliance reporting is in accordance with EPA's requirements.

Mapping:

The entire facility and Central Unit and Lower Unit have been geospatially mapped and is available on the Facility's EPA Factsheet.

Conclusions and Recommendations:

All elements of the Final Remedy have been successfully implemented. A temporary reduction in pumping rates has been approved by EPA in order to evaluate efficiency of the GWRT system.

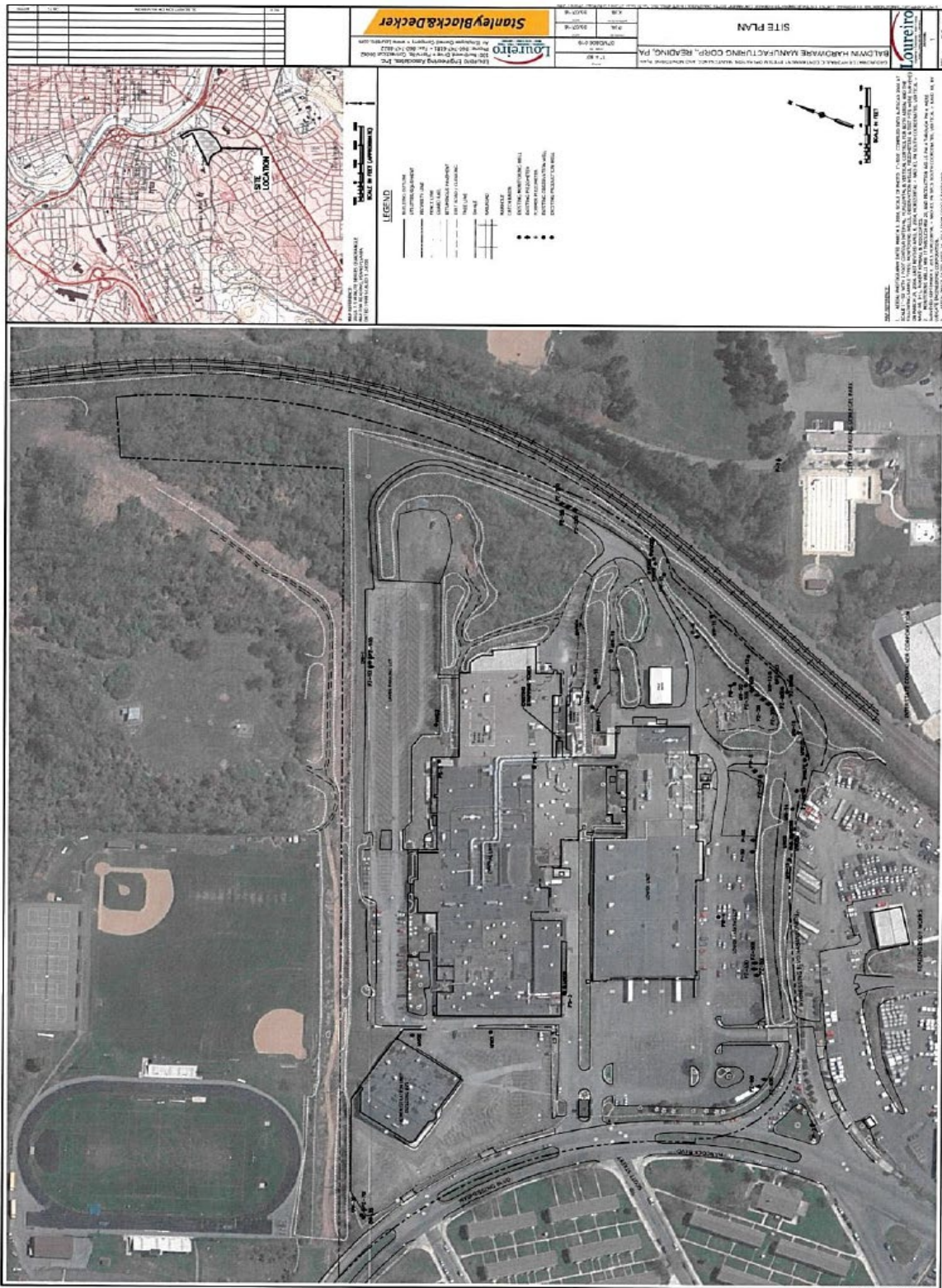
Files Reviewed:

2022 and 2023 SVMS and GWRT system reports
11/22/2019 Environmental Covenant
08/24/2017 FDRTC

Enc.:

Attachments

Attachment 1. Map of facility.



Attachment 2: Remedial EC/IC Summary Table.

Facility Name	SBD Property Holdings			
Address	841 East Wyomissing Blvd., Reading, PA			
EPA ID#	PAD			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls, and mechanisms
Groundwater Use	X		Site-wide	11/22/2019 Environmental Covenant restricts to non-potable uses until TCE $\leq$ 5 ug/l throughout plume
Residential Use	X		Site-wide	11/22/2019 Environmental Covenant restricts to non-residential land-use
Excavation	X		Site-wide	11/22/2019 Environmental Covenant restricts to only EPA-approved earth moving that may impact GWRT system and SVMS.
Vapor Intrusion	X		Central Unit and Lower Unit (bldgs 3, 12, and 50/51)	11/22/2019 Environmental Covenant requires active SVMS at bldgs above Central and Lower Units
Capped Area(s)	X		Central Unit	11/22/2019 Environmental Covenant requires building floor integrity for Central Unit in order for that building to be used.
Groundwater Engineering Controls	X		Site-wide	11/22/2019 Environmental Covenant requires GWRT system to operate until TCE $\leq$ 5ug/l throughout the plume.
Other Engineering Controls	X		Central Unit and Lower Unit (bldgs 3, 12, and 50/51)	No construction of new structures on geographic locations of Central Unit and Lower Unit unless a SVMS is approved by EPA.
Other Restrictions	X		Site-wide	Compliance with 2016 GWRT OMM Plan, 2016 SVMS OMM Plan, and 2016 Site Management Plan
Other Restrictions	X		Central Unit and Lower Unit (bldgs 3, 12, and 50/51)	In the event Grantee's obligations are transferred to Grantor or the then-current owner, Grantor or the the-current owner shall operate SVMS systems in bldgs above Central and Lower Units in accordance with EPA-approved OMM Plan.

LTS Checklist Template

<u>IC Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have the ICs specified in the remedy been fully implemented? Implementation mechanism in place?	X		SVMS and GWRT in place and working correctly
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?	X		Entire site
• Are the ICs eliminating or reducing exposure of all potential receptors to known contamination?	X		
• Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied?	X		
• Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies?		X	
• Are modifications to the IC implementation mechanism needed? (i.e. UECA Covenant, Permit or Order)	X		Modified GWRT plan has been approved by EPA for 1 year.
• Are there plans to develop or sell the property?	X		Property has been sold
• Have all reporting requirements been met?	X		SVMS and GWRT reports are current and comply with reporting requirements

<u>Groundwater Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is groundwater onsite used for potable purposes?		X	
• Is the Facility connected to a public water supply?	X		
• Have any new wells been installed at the facility?		X	
• Are the current groundwater flow rate and direction similar as mentioned in the previous studies?	X		
• Groundwater contaminants stable or decreasing in concentration?	X		
• Are groundwater monitoring wells still in place (# wells)?	X		22 monitoring points

• Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency?		X	Modified GWRT Plan reduces recovery and treatment volume for 1 year to evaluate capture zone.
• For wells where groundwater monitoring is no longer required, have the wells be decommissioned?	X		
• Is there evidence of monitored natural attenuation occurring in groundwater?		X	
• Has (active remediation system) been maintained as necessary?	X		
• Is the (groundwater containment system) effectively containing COCs and protecting potential receptors (surface water body and/or groundwater resource) via hydraulic control?	X		
• Have notification letters been sent to the local POTW, County Department of Health, and Planning and Zoning Department regarding groundwater use restrictions?	X		

<u>Surface and Subsurface Soil Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the facility being used for residential purposes?		X	
• Have there been recent construction or earth-moving activities or plans for such?		X	

<u>Engineered Cap or Cover Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have geosynthetic/vegetative landfill caps (name) been properly maintained?	X		Central and Lower Unit building floors are used as caps
• Have any repairs been necessary? (i.e. regrading, filling, root removal)		X	No repairs have been necessary to building floors
• Is the leachate collection system operating and effectively preventing groundwater contamination?			NA

<u>Vapor Intrusion Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have there been construction of new structures within the vapor intrusion restriction zone(s)?		X	
• Is the vapor intrusion mitigation system radius of influence effective for the structure in which its installed?	X		Regular reporting of SVMS operation

<u>Miscellaneous Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the security fence intact?	X		Buildings and fencing are locked
• Is the appropriate signage posted?	X		