UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

FORMER BALDWIN HARDWARE CORPORATION

841 EAST WYOMISSING BOULEVARD
READING, PENNSYLVANIA

EPA ID NO. PAD002350833

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
March 2017

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List of Acronyms

AOC	Areas of Concern
AR	Administrative Record
EPA	Environmental Protection Agency
FDRTC	Final Decision Response to Comments
GPRA	Government Performance and Results Act
MCL	Maximum Contaminant Level
PADEP	Pennsylvania Department of Environmental Protection
RCRA	Resource Conservation and Recovery Act
RSL	Regional Screening Level
SB	Statement of Basis
VOC	Volatile Organic Compound

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 former Baldwin Hardware Corporation (Baldwin) facility located at 841 East Wyomissing Boulevard, Pennsylvania (Facility or Site).

EPA's proposed remedy consists of the operation, monitoring and maintenance of soil vapor mitigation systems as well as a groundwater recovery and treatment system. EPA is also proposing to require maintaining the integrity of concrete slab floors of occupied buildings. In addition, EPA's proposed remedy requires the implementation of land-and groundwater-use restrictions through institutional controls (ICs). ICs are non-engineered instruments such as administrative and/or legal controls that minimize the potential for human exposure to contamination and/or protect the integrity of the remedy by limiting land or resource use. EPA proposes to implement the final remedy for the Facility through an enforceable document such as an order and/or environmental covenant.

The Facility is subject to the 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. Sections 6901 to 6992k. The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have been investigated and that all releases of hazardous waste and hazardous constituents have been remediated. The Commonwealth of Pennsylvania (the 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.

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 8, Public Participation, for information on how you may review the AR. Information on the Corrective Action Program as well as a fact sheet for the Facility can be found by navigating through the EPA website https://www.epa.gov/hwcorrectiveactionsites/corrective-action-programs-around-nation#3.

Section 2: Facility Background

The Site is a 28-acre property in Reading, Pennsylvania, formerly occupied by Baldwin from 1956 to 2014. Baldwin's 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, which consists of buildings 50, 51, and 51A, was used for storage, shipping and plating operations. The Central Unit is connected to the Lower Unit; together they occupy 260,000 sq. ft. The Administration Unit is a detached building that housed the sales, marketing and engineering departments. No manufacturing operations were associated with the Administration Unit.

The Site is bounded to the east by railroad tracks, beyond which lies Schlegel Park. To the south of the Site is an industrial complex, to the west is East Wyomissing Boulevard and to the north is a high school.

2.1 Site Ownership

In 1956, Baldwin Hardware began operations at its Reading location. In 1982, Baldwin Hardware become a wholly owned subsidiary of Masco Corporation. 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.

Section 3: Summary of Environmental Investigations

3.1 Environmental Investigations

Baldwin had used two unlined surface impoundments at the Facility for the storage of electroplating wastewater treatment sludges. These impoundments were closed in 1984 under oversight of the Pennsylvania Department of Environmental Resources, predecessor to Pennsylvania Department of Environmental Protection (PADEP). Groundwater sampling showed TCE contamination, presumed released from the surface impoundments. In 1987, Baldwin and EPA entered into an Administrative Order on Consent (Consent Order) pursuant to Section 3008(h) of the Resource Conservation and Recovery Act. Under the Consent Order, the Facility installed a groundwater recovery and treatment system and network of monitoring wells to verify that TCE was hydraulically controlled onsite and that the removed groundwater properly treated.

During due diligence sampling initiated by the sale of the Facility property to The Black & Decker Company in October 2003, additional contamination was found in groundwater, soil and soil vapor at the Facility. Since the sale of the Facility property, a number of Facility-wide and more focused investigations have been completed involving various environmental media: January-August 2004 (groundwater (GW), soil, soil vapor); November 2005 (GW); May 2007 (GW); July 2008 (soil, GW); June-August 2009 (soil vapor); May-August 2013 (GW); November 2014 (soil); February 2015 (indoor air); February 2016 (indoor air and soil vapor). The cumulative results of these investigations is discussed below.

3.1.1 Central Unit

Both the soil and soil vapor investigations overall showed two primary TCE release areas within the footprint of the Central Unit. TCE-impacted soils overlying shallow bedrock under Buildings 3 and 12 directly relate to the locations of former vapor degreasers. The most heavily impacted soils are encountered at 0-4 feet below the building floor. In the 2004 investigation, under Building 3, the maximum TCE soil vapor concentration was found to be 1,300,000 micrograms per cubic meter of air (ug/m^3), and 280,000 ug/m^3 under Building 12. The soil vapor contamination, has spread widely under the buildings. The soil vapor was investigated again in 2009 and results similar to 2004 were reported.

In soils under Building 3, the maximum TCE concentration was found to be 93 milligrams per kilogram (mg/kg), and 1000 mg/kg under Building 12, which is above the EPA allowable risk range of 1x10-4 to 1x10-6 for an industrial exposure scenario. The soil contamination is very localized to the areas very near the degreasers.

When VOC contamination is located beneath building slabs or basement floors the potential for vapor intrusion into the building is the primary pathway for exposure. In 2016, Black and Decker conducted paired indoor air and soil vapor sampling within the occupied space and beneath the floor of the Central Unit.

This is EPA's recommended protocol for evaluating the risk posed by subslab VOC contamination since contaminant source concentrations can be directly compared to concentrations within the occupied space. In this case, indoor air values were found to be below EPA's health-based standard of 8 ug/m3. The subslab results showed TCE above guidelines for potential vapor intrusion, however the soil vapor results were lower than their respective 2004 values; Building 3 had a maximum soil vapor result of 57,000 ug/m3 and Building 12 showed a maximum result of 68,000 ug/m3.

3.1.2 Lower Unit

Under Buildings 50 and 51, TCE in soil vapor was detected in 2004 (maximum 360,000 ug/m3). Solvents were not used in the plating processes associated with Buildings 50 and 51 and no VOC-related wastes or raw materials were known to have been stored there. Given the location of the Lower Unit relative to upslope release areas in the Central Unit, the presence of

TCE in soil vapor beneath the Lower Unit can be attributed to lateral dispersion through permeable zones at the surface of the overburden soil. TCE has not been detected at elevated levels in soils beneath the Lower Unit. However, as significant TCE was found in the soil vapor, a subslab depressurization system has been installed under Buildings 50 and 51 to prevent vapor intrusion into the buildings.

3.1.3 Other TCE in Soil

An additional area with TCE-contaminated soil was identified southeast of Building 51, near Production Well 5. The highest concentration of TCE and associated degradation products found was at a depth of 12 feet. Minimal soil impacts were found above and below this depth, suggesting the contamination was a result of placement of solvent impacted material during construction of the Building 51 in the early 1980s. TCE was found in only three samples and at a maximum concentration of 3 mg/kg. This contamination does not pose an exposure threat to workers at this depth and is not expected to migrate to groundwater.

An area of TCE soil contamination at a depth of 52 feet below ground surface was found near PW-6, a new recovery well. TCE was found in soil at a maximum concentration of 8 mg/kg. As soil above this depth has not been impacted by TCE, and this depth is close to the saturated zone, this contamination is understood to be from groundwater periodically discharging into the overburden bedrock fractures during times of significant rain events and high water table elevation. There is no expected worker exposure to this contamination as it is far below ground surface.

3.1.4 Groundwater

Numerous monitoring wells, observation wells and piezometers have been installed at the Site since the mid-1980s for the assessment of groundwater flow and groundwater quality within the bedrock and overburden aquifers. In 1988, Baldwin installed and continuously operated a groundwater recovery and treatment system for the TCE plume found downgradient of the closed unlined surface impoundments. Initiated by the sale of the Facility property in 2003, additional environmental investigation was conducted across the Site, including groundwater.

Baldwin conducted a Site-wide groundwater investigation in 2004. At that time, Baldwin installed numerous groundwater monitoring wells and piezometers to assess more detailed groundwater characteristics than the then-current groundwater recovery and treatment system provided. Baldwin has installed a total of over 50 wells and piezometers across the Site. Additional investigations were performed between 2004 and 2013, and provided a clearer picture of the TCE plume and flow zones. The resulting data was used for design modifications to the recovery system to ensure capture of the newly discovered contamination and enhance efficiency of the treatment system.

The primary constituent detected in groundwater beneath the Site remains TCE, with significantly lower concentrations of daughter products, such as 1,2-dichloroethene. The highest

concentrations of TCE have consistently been detected in observation wells and piezometers located within the southeastern portion of the Site near production well PW-5 and MW-20 (830 ug/l of TCE in 2013). With respect to the vertical distribution of TCE, the highest concentrations are present in the upper portion of the bedrock aquifer within the zone approximately 60 to 100 feet below grade. A significant decrease in concentrations has been detected in monitoring wells and piezometers screened below these depths.

For all environmental investigations conducted at the Facility, groundwater concentrations were screened against federal Maximum Contaminant Levels (MCLs) promulgated pursuant to the Safe Drinking Water Act, 42 U.S.C. §§ 300f et seq., and codified at 40 CFR Part 141, or if there was no MCL, EPA Region III Screening Levels (RSL) for tap water for chemicals. Soil concentrations were screened against EPA RSLs for residential soil and industrial soil. EPA also has RSLs to protect groundwater from contaminants migrating through soil. Soil concentrations were also screened against those soil-to-groundwater RSLs.

3.2. Summary of Remedial Activities Completed

3.2.1 Soil Vapor Mitigation System

A Soil Vapor Mitigation System (SVMS) was designed and installed under each of Buildings 3, 12 and one system was installed jointly under buildings 50 and 51 as these buildings adjoin and share a common wall. The systems will be operated to mitigate vapor intrusion hazards where data from investigation activities indicates the potential for intrusion of vapors into the overlying structure, using a commercial-and industrial-use scenario.

The SVMSs are intended to eliminate the soil vapor-to-indoor air exposure pathway by maintaining a negative pressure environment beneath portions of the concrete floor. Each SVMS is comprised of PVC piping installed through the slab floor and a fan connected with the piping. When the SVMS is on, the fan applies a vacuum beneath the slab and the vapors in the soil beneath the building are directed to an outdoor enclosure which houses the fan and granular activated carbon. The vapors are directed through the activated carbon to remove any contaminants before the air is released through a stack.

The systems were installed and pilot testing was completed in 2015 and 2016. Pilot testing involved collection of subslab vacuum measurements throughout each SVMS to confirm the presence of a negative pressure environment. Approximately 35 permanent vacuum measurement points have been installed for long-term monitoring. Once full build-out is completed for the interiors of Buildings 3, 12 and 50/51, a round of indoor air sampling will take place to confirm indoor air values are below EPA's health-based standard of 8 ug/m^3. A report detailing construction and system testing and operational data will be submitted to EPA once all startup testing is completed.

The design and operation of the SVMS is detailed in the *Soil Vapor Mitigation Systems Operation, Maintenance and Monitoring Plan*, dated May 2016, and approved by EPA on January 24, 2017.

3.2.2 Modified Groundwater Recovery and Treatment System

Modifications to the groundwater recovery and treatment system required under the 1987 Consent Order were necessary to capture the additional groundwater contamination found during the 2004 and subsequent groundwater investigations. These modifications will also accommodate Site renovation plans by the current Facility property owner, ensure continuous operation of the system, and reduce future maintenance requirements associated with aging equipment. Modifications include construction of new underground utility lines for plumbing and electric; replacement of the existing air-stripping tower with a new low profile unit; installation of fully automated controls and remote telemetry; activation of a new production well to promote further improvements in groundwater quality; and, construction of a new building for treatment system components.

As part of the proposed upgrades, production wells PS-2 and PW-4 will be eliminated from the recovery well network due to declining mass removal rates. Recovery wells PS-1 and PW-3 had previously been removed from the recovery system for operational issues. A new bedrock recovery well designated PW-6 was installed in August 2013 at a location where persistently high levels of TCE and other compounds have been detected in groundwater near the southeast property boundary. PW-6 is expected to increase VOC mass removal from the groundwater by drawing contamination from the shallow bedrock zone, where the newly found contamination is centered. PW-5 will continue to draw from a deeper zone, as in the previous groundwater recovery system. These two wells will operate continuously through startup and long-term operation of the system.

The new groundwater recovery and treatment system was activated in December 2016. Preliminary data will be collected to evaluate performance of the new air-stripper and to verify initial hydraulic containment of the VOC plume within the bedrock and overburden aquifers. A full year of startup testing and operational data gathering will result in a construction completion report to be submitted to EPA. This will enable EPA and the Facility to verify long-term efficiency and plume control.

The details of design and operation of the groundwater recovery and treatment system is detailed in the *Groundwater Hydraulic Containment System Operation, Maintenance, and Monitoring Plan*, dated January 2016, and approved by EPA on March 21, 2016.

3.3 Environmental Indicators

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address RCRA corrective action facilities. Under GPRA, EPA evaluates two key environmental clean-up indicators (EIs) for each facility: (1) Current Human Exposures Under Control, and (2) Migration of Contaminated Groundwater Under Control. The Facility met the Human Health EI on September 18, 2006 and the Groundwater EI on August 27, 2007.

Section 4: Corrective Action Objectives

EPA's Corrective Action Objectives (CAO) for the specific environmental media at the Facility are the following:

1. Soils

EPA's CAO for soil is to prevent human exposure to contaminants found at concentrations above the EPA allowable risk range of 1x10-4 to 1x10-6 for an industrial-exposure scenario.

2. Indoor Air

EPA's CAO for Indoor Air is to prevent exposure to VOCs above EPA's Indoor Air Standard for TCE of 8 ug/m3.

3. Groundwater

EPA expects final remedies to return usable groundwater to its maximum beneficial use. EPA has determined that maximum beneficial use of the Facility groundwater is for potable purposes. Therefore, EPA's CAO for Facility-wide groundwater is to achieve EPA's drinking water standard, otherwise known as MCLs, or the relevant tap water standards and to prevent exposure to contaminants while contaminant levels remain above drinking water standards. TCE is the primary contaminant that, Site-wide, exceeds its applicable MCL in Facility groundwater. The MCL for TCE is 5 ug/l.

Section 5: Proposed Remedy

1. Introduction

Under this proposed remedy, some contaminants remain in the soil, soil vapor and groundwater at the Facility above levels appropriate for residential or industrial use. EPA's proposed remedy requires compliance with, and maintenance of, the Central and Lower Unit vapor mitigation systems and compliance with, and maintenance of, the modified groundwater recovery and treatment system. To eliminate or reduce further the contaminants that remain in the soil, soil vapor and groundwater at the Facility and to prevent human exposure to the contaminants while they remain in the soil, soil vapor and groundwater at the Facility above levels appropriate for residential uses, EPA proposes to require the maintenance and inspection of the integrity of the Central and Lower Unit floors and land and groundwater use restrictions.

A. Soils

Because VOCs remain in soils under the Central Unit above levels appropriate for industrial and residential use, EPA's proposed remedy requires land use restrictions to restrict activities that may result in exposure to those contaminants. EPA's proposed remedy

incorporates the existing floors in the Central Unit as a "cap" to eliminate exposures to TCE remaining in the subsurface. The remedy proposes an inspection and maintenance program to assure the integrity of the floors in the central unit for this purpose.

EPA is proposing land-use restrictions be implemented at the Facility to prohibit the following: residential uses and use of the Central Unit unless the integrity of the floor of that building is inspected and maintained.

In addition, SBD shall provide EPA with a coordinate survey, as well as a metes and bounds survey, of the Facility boundary; the Central Unit, and the Lower Unit. Mapping the extent of the land-use restrictions will allow for presentation in a publicly accessible mapping program such as Google Earth® or Google Maps®.

B. Indoor Air

As elevated levels of VOCs remain in soil vapor under the Central and Lower Units, EPA's proposed remedy requires that vapor mitigation systems be operated, maintained and monitored in buildings located in the Central and Lower Units to meet EPA's Indoor Air standards. In addition, EPA proposes that a vapor intrusion control system 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.

EPA is proposing the following Indoor Air use restrictions be implemented at the Facility:
1) Operate, monitor, and maintain the SVMS systems as stated in the EPA-approved *Soil Vapor Mitigation Systems Operation, Maintenance and Monitoring Plan*, dated May 2016, to ensure TCE is at or below 8 ug/m3 in indoor air;
2) Prohibit use of the Facility buildings unless the SVMS systems are in operation; and
3) Prohibit construction of new structures above the Central Unit and the Lower Unit unless a vapor intrusion mitigation system is installed.

C. Groundwater

Groundwater at the Facility contains VOCs above EPA's drinking water standards, known as MCLs. EPA's proposed remedy requires 1) operation, monitoring and maintenance of a modified groundwater recovery and treatment system as stated in the EPA-approved *Groundwater Hydraulic Containment System Operation, Maintenance, and Monitoring Plan*, dated January 2016, until TCE is at or below 5ug/l consistently in all wells; and 2) 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.

Section 6: Evaluation of Proposed Remedy

This section provides a description of the criteria EPA used to evaluate the proposed remedy consistent with EPA guidance. The criteria are applied in two phases. In the first phase, EPA evaluates three decision threshold criteria as general goals. In the second phase, for those remedies that meet the threshold criteria, EPA then evaluates seven balancing criteria.

Threshold Criteria	Evaluation
1) Protect human health and the environment	EPA's proposed remedy is protective of human health and the environment. The primary human health and environmental threats posed by the remaining VOC contamination in Facility soils are direct exposures to the contamination and vapor intrusion into occupied buildings. EPA's proposed remedy requires the operation/monitoring/maintenance of the vapor mitigation systems and the groundwater recovery and treatment system, that the integrity of the floors be maintained and the compliance with and maintenance of land and groundwater use restrictions at the Facility.
2) Achieve media cleanup objectives	The soils with elevated levels of VOCs are beneath the Central Unit. Although they exceed direct contact and soil to groundwater non-residential standards, these soils do not pose a human health or environmental exposure risk because they are contained under buildings. EPA's proposed remedy requires that the integrity of the floors of those buildings be maintained. Soil vapor beneath the Central and Lower Units exceeds standards for potential intrusion into the occupied spaces above. EPA's proposed remedy requires that soil vapor mitigation systems be operated to ensure compliance with EPA's Indoor Air standards. The proposed remedy also requires a land-use restriction for EPA approval for any construction of occupied buildings. Groundwater contamination at the Facility is above MCLs, therefore EPA's proposed remedy requires that the groundwater recovery and treatment system be operated to ensure VOC capture, as well as treatment of recovered

	groundwater, until MCLs are met. In addition, EPA's proposes remedy require groundwater use restrictions until MCLs are met.
3) Remediating the Source of Releases	In all remedy decisions, EPA seeks to eliminate or reduce further releases of hazardous wastes or hazardous constituents that may pose a threat to human health and the environment. The remaining VOCs in soil and soil vapor are limited to beneath the footprints of the Central Unit and the Lower Unit. The floors provide impermeable covers that eliminate direct contact exposures and prevent water infiltration and potential leaching of VOCs into the groundwater. The potential threat of this contamination is vapor intrusion into indoor air of the Units. The vapor mitigation systems will be operated to ensure compliance with EPA's Indoor Air standards until such time as it can be demonstrated that conditions no longer pose a risk for vapor intrusion. Contaminated groundwater will be remediated with a modified groundwater recovery and treatment system. The groundwater system will be operated until the Facility demonstrates that the TCE MCL has been attained in all monitoring wells.

Balancing Criteria	Evaluation
4) Long-term effectiveness	The proposed remedy will protect human health and the environment over the long term by controlling exposure to contamination remaining in soils, soil vapor and groundwater. EPA's proposed remedy requires operation/monitoring/maintenance of the vapor mitigation systems and the modified groundwater system to ensure EPA standards are met. EPA's proposed remedy also requires that the integrity of the Central Unit and the Lower Unit floors be maintained and the compliance with, and maintenance of, land-and groundwater-use restrictions at the Facility. EPA anticipates that the land-and groundwater-use restrictions will be implemented through an environmental covenant to be recorded with the deed for the Facility property. The environmental covenant will be inseparable from the land with the land and as such, will be enforceable by EPA and the State against future land owners.

5) Reduction of toxicity, mobility, or volume of the Hazardous Constituents	The proposed remedy reduces the toxicity, mobility or volume of VOCs in soils, soil vapor and groundwater at the Facility. There are no direct exposures to the soils and soil vapor beneath the Central Unit and the Lower Unit. The respective floors operate as caps for each Unit to minimize any potential migration of the contamination from its existing location to groundwater. The potential for soil vapor migration into the occupied buildings is alleviated by the soil vapor mitigation systems. The modified groundwater recovery and treatment system minimizes potential migration of contaminants and reduces the volume of the source material.
6) Short-term effectiveness	EPA's proposed remedy does not involve any additional activities, such as construction or excavation that would pose short-term risks to workers, residents, and the environment. In addition, EPA anticipates that the land-and groundwater-use restrictions will be fully implemented shortly after the issuance of the Final Decision and Response to Comments (FDRTC).
7) Implementability	EPA's proposed remedy is readily implementable. The soil vapor mitigation systems and modified groundwater recovery and treatment system are constructed and operating. EPA anticipates that the land-and groundwater-use restrictions will be fully implemented shortly after the issuance of the FDRTC.
8) Cost	EPA's proposed remedy is cost effective. The soil vapor mitigation systems and groundwater recovery and treatment system are already operating. The continuing costs will be operational, monitoring and maintenance. The cost in implementing ICs at the Facility is minimal.
9) Community Acceptance	EPA will evaluate community acceptance of the proposed remedy during the public comment period for this SB and will describe community acceptance in the FDRTC.
10) State/Support Agency Acceptance	EPA will evaluate State acceptance of the proposed remedy during the public comment period and will describe the State's position in the FDRTC.

Section 7: Financial Assurance

The previous groundwater recovery and treatment system was constructed pursuant to EPA's 1987 Consent Order and Closure/Post Closure requirements under PADEP. Under PADEP oversight, MASCO filed financial instruments appropriate for continued operation of the recovery and treatment system with PADEP. EPA has asked SBD to provide updated Cost Estimates for the vapor mitigation systems and the modified groundwater recovery and treatment

system. EPA will evaluate that information to determine if adjustments need to be made to the existing instruments.

Section 8: 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 Ms. 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 Ms. 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: Ms. Linda Matyskiela (3LC20)
Phone: (215) 814-3420
Fax: (215) 814-3113
Email: Matyskiela.Linda@epa.gov

Attachment:
Figure 1: Map of Facility

Date: 03-30-2017

DAVID CAMPBELL
for Catherine A. Libertz
Acting Director
Land and Chemicals Division
US EPA, Region III

Section 9: Index to Administrative Record

Administrative Order on Consent to Baldwin Hardware Corporation, April 13, 1987

Groundwater Monitoring and Progress Reports – dated February 1989 through February 2017

Overburden Groundwater Characterization Report, dated September 14, 2009

Phase II/III Environmental Site Assessment Report, dated December 2009

Hydrogeologic Investigation Report and Proposed Modifications to Hydraulic Containment System, dated December 2013.

Groundwater Hydraulic Containment System Operation, Maintenance, and Monitoring Plan, dated January 2016.

Supplemental Soil Investigation Report, dated April 2016.

Site Management Plan, dated May 2016

Soil Vapor Mitigation Systems Operation, Maintenance and Monitoring Plan, dated May 2016.

Attachment

Figure 1: Map of Facility