



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Former Eltra Corporation/Former Prestolite Battery **DATE:** 11/02/2020
4700 N 5th Street Highway
Reading, Pennsylvania 19560
EPA ID: PAD069785632

Long Term Stewardship Assessment

FROM: Diane Schott
Project Manager

A handwritten signature in blue ink that reads "Diane Schott".

TO: Long Term Stewardship File for
RCRA Corrective Action Branch

Remedy Review Summary:

EPA's Final Decision dated July 5, 2017 required the current property owner of the Former Prestolite Battery Facility to comply with and maintain land and groundwater use restrictions which were implemented by the PADEP program via an Environmental Covenant which was executed in May 2016 and recorded in the Berks County Recorder of Deeds on June 13, 2016.

Under the activity and use limitations, use of the property is to be non-residential and until the concentration of lead in groundwater is 15 ug/l or lower, groundwater is not to be used (unless to implement the remedy) and no new wells are to be installed. Groundwater monitoring is not required or planned.

The land and groundwater use restrictions have been and will continue to be maintained. The property remains under continued commercial and light industrial use. The Facility uses only public water and has no plans to use groundwater or install wells. Soils at the designated areas "A", "B", "C", "D" and "E" have not been disturbed and no plans to disturb such soils exists. Engineering controls are not required. Therefore, the Facility is in conformance with EPA's Final Decision.

Background:

The Facility occupies 3.8 acres in Temple Borough, Muhlenberg Township, Berks County, Pennsylvania. Temple Borough was an independent borough until it was disincorporated on January 1, 1999. The area of Temple Borough lies within the Reading, Pennsylvania metropolitan area and a mailing address of Reading is now used.

From the 1920's to around 1985, the Facility was used as an autobody shop. Additionally, from the 1950's to around 1985, lead acid batteries were manufactured from pig lead and sulfuric acid. Lead was shipped to the Facility in approximately 1,000-pound blocks. At the Facility, the blocks were melted and cast into battery components.

Since 1987, the Facility has been leased to various tenants for non-manufacturing activities.

In 1990, due diligence investigations associated with a sale of the property discovered a release of lead.

In September 2015, soil at four areas (areas "A", "B", "C" and "D") was removed to a PADEP non-residential statewide health standard of 450 mg/kg. Soil at a fifth area, designated area "E", was removed to the same standard in October 2015. The concentration of 450 mg/kg is Pennsylvania's standard to protect against lead leaching from soil to groundwater. The concentration of lead at all five areas ("A", "B", "C", "D", and "E") is below EPA's non-residential direct contact screening level of 800 mg/kg but exceeds EPA's residential direct contact screening level of 400 mg/kg.

A detection of 27 ug/l lead was found in one sample of site groundwater that was collected on August 7, 2014. Such detection exceeds EPA's Maximum Contaminant Level (MCL) of 15 ug/l for lead in drinking water.

In January 2016, the facility submitted an Act 2 Final Report to PADEP. On March 4, 2016, PADEP approved the report for attainment of the Non-Residential Statewide Health Standard for lead in soils.

In May 2016, an environmental covenant (EC) was executed, listing Kaiser Investment Company with a mailing address of 4700 North 5th Street, Suite 2, Temple, PA 19560 as the Grantor and Grantee. The EC was recorded in the Recorder of Deeds Office in Berks County, Pennsylvania on June 13, 2016.

EPA's July 5, 2017 remedy decision relied on the existing EC. Based on the volume of lead contaminated soil that was removed, the May 2017 SB proposed that the concentration of lead in groundwater will decline to its MCL of 15 ug/l via natural attenuation. As no private drinking water wells were located within a 1.5-mile radius of the facility and potable water is supplied to the Facility and the surrounding area via a public water supply, groundwater monitoring was not required or planned.

The public water supply to the area is provided by the Muhlenberg Township Authority. The Authority system serves portions of Muhlenberg Township, including the former Borough of Temple, and portions of Laureldale Borough and Alsace Township. Per the Annual Drinking Water Quality Report available on the Muhlenberg Township Authority Web Site, public water is sourced from a series of nine (9) deep groundwater wells located throughout the township. The Authority reports that from January 1 to December 31, 2019, the concentration of lead in 37 samples collected by the Authority ranged from non-detect to 8.0 ug/l and did not exceed the action level of 15 ug/l.

At the time of the remedy decision, the site primarily was used as a warehouse facility. The current Berks County property record for property ID 66530911751428 shows the property of 3.8 acres with industrial zoning and an industrial building and detached improvements, with a deed instrument dated January 26, 2015 and numbered 2015 002502. A September 4, 2020 “Assignment of rents” for the property to Trust Bank is recorded in Berks County Recorder of Deeds on the date of 9/10/2020 and signed by Christian Y Leinbach and David K Leinbach, General Partners of Kaiser Investment Company, indicating portions or all of the property subject to a mortgage continues to be rented or leased.

On November 2, 2020, Mr. David Leinbach verified use restrictions and institutional controls remain in place and will remain in place.

Documents and Information Reviewed:

- EPA Fact Sheet, (Last updated May 2017)
- EPA Statement of Basis for Remedy (May 2017)
- EPA Final Decision and Response to Comment (July 2017)
- Facility property records for Berks County Parcel ID: 66530911751428 recorded in the Berks County Recorder of Deeds
- Environmental Covenant Instrument #2016019565 dated May 27, 2020, with PADEP, recorded 06/13/2016
- Verified the Environmental Covenant remains listed on the property web site maintained by the Berks County Recorder of Deeds
- Verified the Environmental Covenant is listed on the Pennsylvania activity and use limitations web site (November 2, 2020)
- Verified the Environmental Covenant is reflected in RCRA Info as CA772PR (Institutional Controls Established- Proprietary Controls)
- Facility Boundaries and Covenant area mapped- On 8/21/2020, confirmed facility boundary and areas designated “A”, “B”, “C”, “D” and “E” in the EC are mapped.
- Image on EPA Web Fact Sheet dated August 21, 2020
- Public water supply information available on the internet Muhlenberg Township (and for Berks County and the Reading Metro Area).
- Facility verification (November 2, 2020).



Institutional Control/Engineering Control Corrective Action Remedy Summary

Facility Name	Prestolite Battery/Former Eltra Corporation			
Address	4700 North 5th Street Highway Temple, PA 19560			
EPA ID Number	PAD069785632			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls and mechanism
Groundwater Use	Yes		Entire Facility	Environmental Covenant Instrument #2016019565 to property owner Kaiser Investment Company provides for the following: <ul style="list-style-type: none"> No GW use other than the operation, maintenance and monitoring activities currently being

				<p>conducted at the Facility and required by PADEP and/or EPA without prior written PADEP and/or EPA approval</p> <ul style="list-style-type: none"> No new wells without prior written PADEP and/or EPA approval.
Residential Use	Yes		Entire Facility	<p>Environmental Covenant Instrument #2016019565 to property owner Kaiser Investment Company provides for non-residential use only- use to exclude residential dwellings, schools, day-care centers, nursing homes, or other residential-style facilities or recreational areas.</p>
Excavation	Yes		Areas Designated "A", "B", "C", "D" and "E" in the EC	<p>In EC only; not in SB</p> <p>Environmental Covenant Instrument #2016019565 to property owner Kaiser Investment Company provides for any soil excavation at these areas to be per a written Soil Management Plan (SMP).</p> <p>EPA RPM understands any such SMP will be submitted to PADEP for review and approval in advance of such soil excavation.</p>
Vapor Intrusion		No		

Capped Area(s)		No		
Other Engineering Controls		No		
Other Restrictions		No		