



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

SUBJECT: Long-term Stewardship Assessment
First Industrial Realty Trust (Former Chain Bike Corp.)
EPA ID: PAD053061909
200 Cascade Drive
Allentown, PA 18103

DATE: September 28, 2022

TO: Alizabeth Olhasso, Branch Chief
RCRA CA Branch 2

FROM: Andrew Clibanoff, RPM
RCRA CA Branch 2

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.

Remedy Assessment Summary:

The facility has been owned by First Industrial Realty Trust since it was purchased from Conewago Equities in 2007. RCRA Info continues to have the name of the facility as Conewago and should be updated. Exposures at the facility continue to be minimized/decreased by the existing institutional controls have been in place since EPA's February 2010 Final Decision. Deed restrictions are in place to ensure the usage of the property remains non-residential and to prohibit the use of groundwater beneath the facility. These restrictions should be carried forward as activity and use limitations (AULs) in an environmental covenant under the Pennsylvania Department of Environmental Protection's (PADEP's) Universal Environmental Covenants Act (UECA).

Facility Background:

Development of the 56-acre Facility began in 1969 and the property was used to manufacture bicycles by Chain Bike Corporation (later renamed Ross Bicycles) from 1971 through 1985. From 1985 through 1987, the Facility produced metal ammunition boxes using similar production processes. Manufacturing ceased in 1987 and the Facility was reportedly abandoned in 1988. In 1995 Hanoverian, Ltd. acquired the Facility, and subsequently Conewago Equities, Inc. purchased the Facility in 1998. The Facility was extensively expanded under Conewago's ownership: the main building was expanded, the 11.6-acre northwest parcel was purchased, and a second warehouse building was constructed in the southeast corner of the Facility. First Industrial Realty Trust purchased the facility in 2007 and is the present owner of the Facility. The Facility currently

houses several commercial and light industrial tenants. Figure 1 presents a site map.

Between 1992 and 1999 more than 500 drums and approximately 530 tons of soils and sludges contaminated primarily with metals (chromium) were removed from the Facility. The sludges were from an on-site wastewater treatment plant that reportedly dumped onto the adjacent northwest parcel. PADEP and EPA approved the attainment of non-residential Statewide Health Standards (SHS) for soils at the Facility in December 2002.

Groundwater beneath the Facility property is known to be contaminated with chromium, trichloroethylene (TCE), 1,1,1-trichloroethane (1,1,1-TCA) and 1,1-dichloroethylene (1,1-DCE). The karstic conditions in the subsurface geology made it difficult to determine the extent of groundwater contamination. Based on the site-specific karst geology PADEP approved and Hanover Township codified a non-use aquifer designation associated with the contamination beneath the Facility. Groundwater beneath the Facility was demonstrated through four quarters of sampling to be in compliance with PADEP's non-use aquifer SHS.

Since the Facility met the non-residential SHS for soil and is located in an aquifer non-use area, ICs are required to ensure that land use at the Facility remains non-residential and groundwater beneath the Facility is prohibited from use.

Current Site Status:

The Facility has continued to house several commercial and light industrial tenants since the mid-1990s. None of the businesses currently at the Facility operates as a Treatment Storage or Disposal Facility (TSDF) under RCRA. The only change to the property since the time of EPA's Final Decision is the expansion of the parking lot by approximately 0.5 acres in the northeast corner of the property. First Industrial Realty Trust recently purchased a parcel of land adjacent to the northeast portion of the Facility and is currently constructing an additional warehouse-type building on that property.

Long-term Stewardship Site Visit:

On September 22, 2022, EPA conducted an LTS site visit at the Facility to discuss and assess the status of the implemented remedies at the Facility.

The attendees were:

Name	Organization	Email Address
Andrew Clibanoff	EPA Region 3	clibanoff.andrew@epa.gov
Mark Sather	First Industrial Realty Trust	msather@firstindustrial.com

Access to the facility property is largely unrestricted. There are no fences or security gates present. There was no need to enter either of the two buildings during the site visit. Mr. Sather confirmed that all of the tenants on the property were using the space for commercial/light industrial purposes and that there was no residential-type use on the property. During a walk around the property, Mr. Sather pointed out the location of the expanded parking lot (Photo No. 1). The Northwest Parcel was heavily vegetated and remains undeveloped (Photo No. 2).

Institutional Controls (ICs) Status:

Groundwater Use Restriction: No person may withdraw or make use of any groundwater underneath the Facility for any purposes unless and until such groundwater meets applicable Act 2 standards. This IC is enforceable through deed restrictions that were recorded in the deed of January 10, 2007 effecting the sale of Facility property to First Industrial Realty Trust. This IC is further enforceable through the Mandatory Aquifer Non-Use Ordinance (Hanover Township Ordinance Number 494) that was signed into law in June 2009 designating the non-use aquifer area. Figure 2 shows the non-use aquifer area boundaries.

Residential Land Use Restriction: No person may use or occupy any portion of the Facility, either temporarily or permanently, for any residential use, recreational area use, or any other residential- style facility use as defined in Section 103 of Act 2. This IC is enforceable through deed restrictions that were recorded in the deed of January 10, 2007 effecting the sale of Facility property to First Industrial Realty Trust.

Engineering Controls (ECs) Status:

No Engineering Controls are in place at the Facility.

Financial Assurance:

Due to the negligible amount of post-remedial activities (e.g. notifications of property transfers) that must be performed as part of the final remedy of the Facility, no financial assurance was required in EPA's Final Decision.

Reporting Requirements/Compliance:

The only reporting requirements the Facility has is to notify EPA and PADEP written documentation following transfer of the property, filing of applications for building permits for the property, or proposals for any site work affecting the contamination on the property. No reporting has been required since the time of the Final Decision.

Mapping:

The Facility property boundaries are mapped on the EPA Web Fact Sheet. The government institutional control, namely Hanover Township Ordinance No. 494, is not called out or mapped on the fact sheet and should be added.

Conclusions and Recommendations:

The ICs in place since the time of EPA's February 2010 Final Decision remain protective of human health and the environment. The following items are recommended at this time.

1. Name of Facility in RCRA Info should be changed from Conewago Equities to First Industrial Realty Trust.
2. Deed Restrictions should be transferred to an UECA environmental covenant.
3. Government Institutional Control (Non-use aquifer boundaries) should be mapped and identified on the Facility's EPA Web Fact Sheet.

Files Reviewed:

EPA's December 2009 Statement of Basis

EPA's February 2010 Final Decision

December 2002 Human Health and Migration of Groundwater Under Control Environmental Indicator Reports

Attachments:

Figure 1: Geospatial Map of Facility

Figure 2: Aquifer Non-Use Area

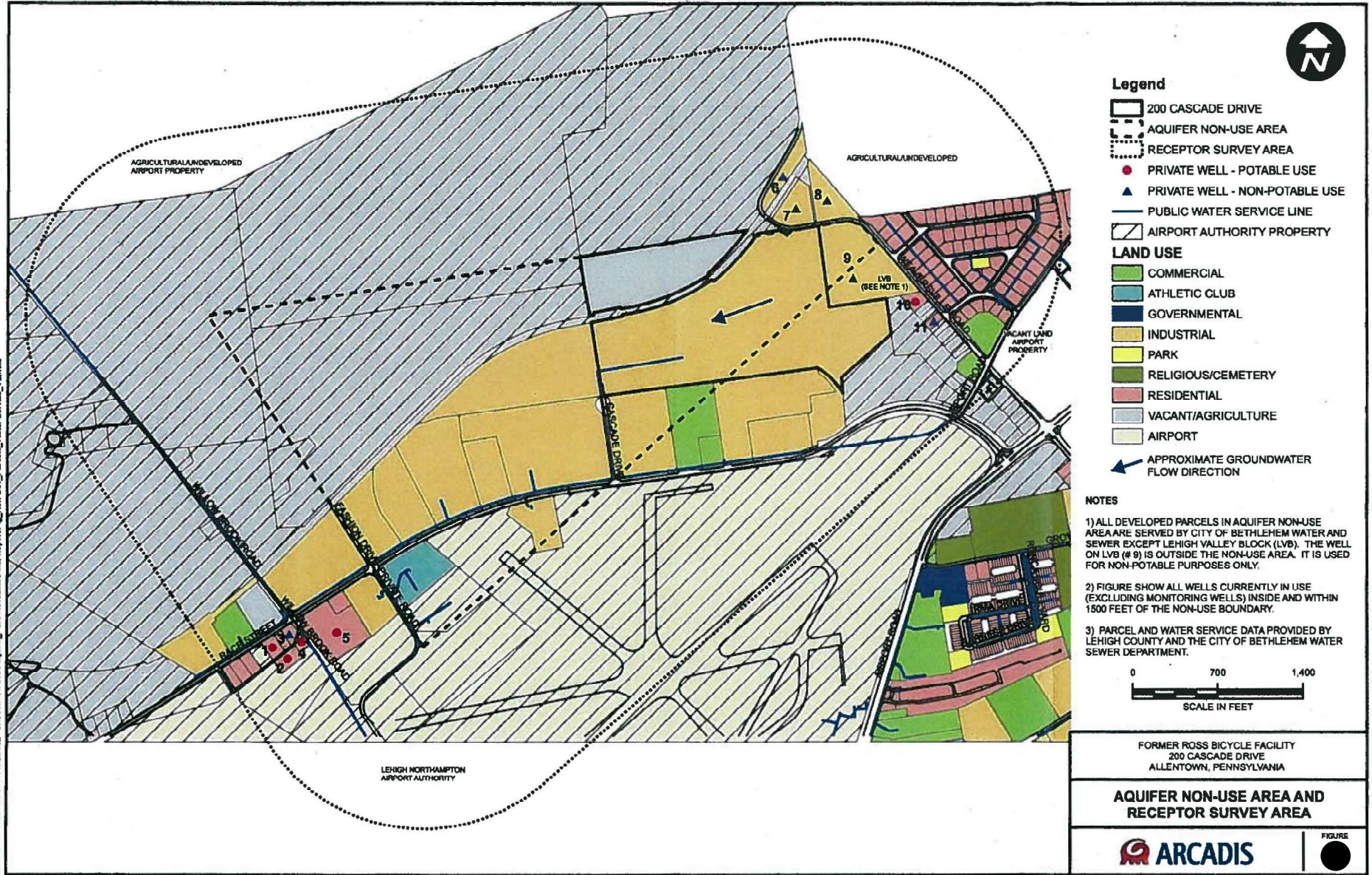
Photos

Figures



0 150 300 600 900 1,200 Feet

CITY: NEWTOWN U:\GIS\GROUPS\ENV DB: PIC. PM. TM. TR.
 PROJECT NUMBER: 02011432.002 C:\Common\GIS\Projects_Files\02011432\Final\02011432\Final\Water Services_V2.mxd



EPA Long Term Stewardship Inspection
 Figure 2

Photos


Facility Name: First Industrial Realty Trust Formerly Chain Bike		Site Location: 200 Cascade Drive Allentown, Pennsylvania	Long Term Stewardship Inspection
Photo No. 1	Date: 9/22/22		
Direction Photo Taken: Northeast			
Description: Expanded parking lot. New construction of Warehouse-type building on adjacent parcel.			

Photo No. 2	Date: 9/22/22		
Direction Photo Taken: East			
Description: Northwest Parcel			