



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

FORMER FRUEHAUF CORPORATION
LEMONT FURNACE, PENNSYLVANIA
EPA ID # PAD004338646

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
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Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the former Fruehauf facility located at 300 University Drive, Lemont Furnace, Fayette County, Pennsylvania 15456 (Facility). EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, EPA's proposed decision is that no further investigation or cleanup is required. EPA has determined that its proposed decision is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time. This SB highlights key information relied upon by EPA in making its proposed decision.

The Facility is subject to EPA's 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. §§ 6901 et seq. (Corrective Action Program). The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property. The Commonwealth of Pennsylvania (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 decision is based. See Section 5, Public Participation, for information on how you may review the AR.

Section 2: Facility Background

The former Fruehauf Corporation facility is an approximately 42-acre parcel located in the northern section of Lemont Furnace, Pennsylvania, approximately 5 miles northeast of the city of Uniontown. The Facility consists of a main production building, a paint shop building to the south of the main building, and an office building west of the main building.

The Facility is bound by commercial and industrial development to the north, east, and south, and by University Drive, the Fayette Campus of Pennsylvania State University, and limited residential development to the west. The Connellsville Airport is located approximately one mile north of the Facility. A location map and a Facility layout are attached as Figures 1 and 2, respectively.

The Greater Uniontown Industrial Fund purchased the Facility in 1959 and leased it from 1961 to 1991 to the Fruehauf Corporation. During this time, Fruehauf used the Facility to manufacture and paint metal truck trailers. The production process involved metal fabrication, welding of aluminum and high-alloy steel, and sandblasting. Fruehauf discontinued operations in 1991 and the Facility was sold in 1992 to Brier Hill Steel Company, who leased the Facility to BAE Systems (formerly United Defense LP) from 1993 to 2013. BAE Systems used the Facility to refurbish and paint armored personnel carriers and military vehicles. The Facility is currently vacant.

The approximately 14,000-square-foot office located directly west of the main building has historically housed several other tenants. Fayette Engineering Company currently occupies the majority of this building.

Section 3: Summary of Environmental History

Based upon information in the 2002 Environmental Indicator (EI) Inspection Report, EPA identified several solid waste management units (SWMUs) at the Facility. The table below describes the SWMUs as well as the post-investigation status. Complete details, including sampling data, can be found in the individual reports which are listed in the Index section of this SB and located in the AR. Sampling included soil and groundwater and covered the SWMUs identified by EPA at the Facility. Target screening levels were determined to be EPA Region 3's Residential Regional Screening Levels (RSLs) for Volatile Organic Compounds (VOCs) and metals in soil, and EPA's Maximum Contaminant Level (MCL) national primary drinking water standards for VOCs and metals in groundwater.

SWMU	Description	Current status
Former Surface Impoundment	Located in southeast corner of Facility. From 1961-1983, received wastewater primarily from trailer washing stations and paint-related wastewater. All wastes, sludge, and one foot of soil underneath sludge were removed according to PADEP-approved closure plan. Certified closed in 1984. Monitoring of groundwater in area continued until 1992 due to detections of 1,1,1-trichloroethane and 1,1-dichloroethane in one of four monitoring wells. A fifth monitoring well was installed in 1990 and sampled again in 2001 for the two VOCs listed above in preparation for EI inspection; neither VOC was detected.	VOCs and metals are below EPA's soil RSLs and below EPA's MCL drinking water standards. As 1,1-dichloroethane does not have an established MCL, concentrations of 1,1-dichloroethane are within EPA's RSL risk range for groundwater.
Abandoned Sewage Treatment Plant	Located east of the paint shop building near the eastern property boundary. From 1961-1983, received all wastewater not directed to impoundment. Abandoned in 1984 and removed between 2004-2006.	No evidence of spills or releases observed or reported.
Former Wastewater Treatment Plant and Sump Pit	Constructed in 1983 in the northeastern corner of the paint shop building to manage wastes previously sent to impoundment. Treatment process generated non-hazardous sludge which was disposed off-site. Initially discharged effluent via permitted outfall to Gist Run, but began discharging effluent to municipal sewage treatment plant in 1989 due primarily to exceedances of five-day Biological Oxygen Demand limits. 8000-gallon sump pit held wastewater collection tanks below grade and reaction tanks for settling and pH adjustment on a platform	No evidence of spills or releases observed or reported.

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	over the sump. Wastewater collection tanks and reaction tanks removed prior to removal of the 2000-gallon waste oil tank (below) in 1997.	
Former 2000-gallon Waste Oil Underground Storage Tank (UST) and Oil/Water Separator	Installed in 1983 as part of the wastewater treatment plant and removed in 1997, along with approximately 86 tons of contaminated soil, under PADEP oversight. UST was in excellent condition (no holes) when removed. Four soil samples were taken from within excavation due to apparent contamination between east wall of paint shop building and former tank location. PADEP reportedly determined that no further action was necessary and the excavation was backfilled.	No further action required after 1997 removal and cleanup.
Current 1000-gallon Waste Oil UST and Oil/Water Separator	Located within sump pit. Installed in 1997 to replace the unit above.	No evidence of spills or releases observed or reported.
Hazardous Waste Storage Shed	Constructed in 1994 and located just east of paint shop building. Diked with steel-lined secondary containment.	No evidence of spills or releases observed or reported.
Former PCB-containing Transformer	Located outside northwest corner of paint shop building. Removed in 2006 and disposed of in accordance with Toxic Substances Control Act requirements.	No evidence of spills or releases observed or reported.
Former 2000-gallon Steel Unleaded Gasoline UST	Installed in 1976 adjacent to loading dock on west side of main production building. After leak was detected in 1989, UST was drained then removed in 1990 under PADEP oversight. Approximately 100 tons of contaminated soil disposed off-site. PADEP believed residual contamination remained but didn't expect it to affect groundwater quality. Four samples collected from walls of excavation and one monitoring well installed.	Total petroleum hydrocarbons, benzene, toluene, ethylbenzene, and xylenes are below EPA's soil RSLs and below EPA's MCL drinking water standards.

In summary, concentrations of hazardous constituents identified in the soil are within EPA's Regional Screening Level risk range for residential use, and concentrations of hazardous constituents identified in groundwater are all below EPA's Maximum Contaminant Level national primary drinking water standards. Therefore, there are no risks to human health or the environment for any use at this Facility including residential.

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Section 4: Environmental Indicators

EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. On April 15, 2002, EPA determined that the Facility had met these indicators.

Section 5: Public Participation

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the decision selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains all information considered by EPA in reaching this proposed decision. It is available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Griff Miller
Phone: (215) 814-3407
Fax: (215) 814-3113
Email: miller.griff@epa.gov

Interested parties are encouraged to review the AR and comment on EPA's proposed decision. The public comment period will last thirty (30) calendar days from the date that notice is published in a local newspaper. You may submit comments by mail, fax, or e-mail to Mr. Miller. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Miller.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC). All persons who comment on this proposed decision will receive a copy of the FDRTC. Others may obtain a copy by contacting Mr. Miller at the address listed above.

Date: 1/6/14

/John A. Armstead/
John A. Armstead, Director
Land and Chemicals Division
US EPA, Region III

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Environmental Priorities Initiative, Preliminary Assessment of Fruehauf Corporation, NUS Corporation, October 10, 1990

Letter from Antech Ltd. to M. Curtis Fontaine of Earth Sciences Consultants regarding water characterization at Fayette Engineering, October 26, 1992

Non-hazardous waste manifests from Waste Management-Greenridge detailing contaminated soil disposal from Brier Hill Steel/United Defense by Metros Excavation, August 6, 1998

Final Environmental Indicator Inspection Report for Formerly Fruehauf Corporation (currently Brier Hill Steel Company), prepared by Foster Wheeler Environmental Corporation, March 2002

Letter from Clean Harbors Environmental Services to United Defense regarding the removal and disposal of PCB-containing transformer, March 8, 2007