



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

LIBERTY PULTRUSIONS
WEST MIFFLIN, PENNSYLVANIA

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
October 2012

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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 Liberty Pultrusions facility located at 1575 Lebanon School Road, West Mifflin, Allegheny County, Pennsylvania 15122 (Facility). EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. EPA visited the Facility in August 2009 and conducted confirmatory sampling in August 2012. Based on these assessments, 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 Liberty Pultrusions facility is a 4.76-acre parcel located approximately eight miles southeast of Pittsburgh in the southern section of West Mifflin, Pennsylvania.

The Facility is bound to the east by a rail line, to the south by Lebanon School Road, and to the west and north by wooded areas. Small residential neighborhoods are located to the east and west of the facility. Industrial areas are located to the south and northwest of the facility. A location map and a Facility layout are attached as Figures 1 and 2, respectively.

Pittsburgh Electrical Insulation, a manufacturer of electrical light fixtures, owned the Facility from 1960 to 1963. Ownership and operations at the Facility prior to 1960 are unknown. From 1963 to 1968 the Facility was owned by Milam Electric, who laminated composites using fiberglass rods. In 1968, the Facility was sold to Tompston Rambo Woolrich – Electro Insulation, who sold the Facility to Westinghouse Electric Corporation that same year. Westinghouse operated the Facility until it was sold in September 1987 to Liberty Polyglas, Inc. In 1996, the assets of Liberty Polyglas were sold to Resolite – United Dominion Industries, Inc. The sale was finalized in January 1997 and has operated as Liberty Pultrusions since that time.

Since September 1987, the Facility has been used to manufacture fiberglass reinforced rods and tubes using the pultrusion process, which allows for continuous lengths of fiber-reinforced polymer shapes to be developed.

Section 3: Summary of Environmental History

A 1989 Preliminary Assessment identified seven Solid Waste Management Units (SWMUs) at the Facility. A 2009 Environmental Indicator (EI) Inspection Report presented updated information on these seven SWMUs and offered recommendations for further investigation of several areas, notably the area north of the Facility in the vicinity of the 6000-gallon waste oil aboveground storage tank (AST) and the former 10,000-gallon fuel oil underground storage tanks (USTs).

EPA conducted a focused sampling effort in this area in August 2012 that showed no contamination in soil or groundwater above levels considered protective of unrestricted use. 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 the EI report 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 poly-chlorinated biphenyls (PCBs) in soil, and EPA's Maximum Contaminant Level (MCL) national primary drinking water standards for VOCs in groundwater. (sampling fieldwork performed by Michael Baker Corporation)

SWMU	Description	Current status
Raw Materials Storage Area	Covered outdoor area on western side of production building; used to store raw resin materials	No evidence of spills or releases observed or reported
Hazardous Waste Storage Area	Covered outdoor area with secondary containment adjacent to Raw Materials Storage Area; stores waste acetone in drums	No evidence of spills or releases observed or reported
6000-gallon Waste Oil AST	No longer in use; stored waste oil which was pumped out monthly and recycled; rests on ground and has no secondary containment	Aug 2012 sampling showed no impact downgradient of this area
Fiberglass Dust Collector/Baghouse Dumpster	Collects fiberglass dust from throughout the Facility; emptied quarterly	No evidence of spills or releases of hazardous materials observed/reported
Garbage Dumpsters	Three dumpsters located on west, north, and east sides of Facility for general trash	No evidence of spills or releases of hazardous materials observed/reported
Empty Acetone Drum Storage Area	Covered outdoor area west of Raw Materials Storage Area; stores drums drained of acetone; collected several times a year	No evidence of spills or releases observed or reported

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Empty Raw Material Drum Storage Area	Outdoor area immediately south of Raw Materials Storage Area; stores drums drained of raw resin materials; collected bimonthly	No evidence of spills or releases observed or reported
Diesel-powered Generator and 275-gallon Diesel Fuel AST	Back-up generator and AST with secondary containment located along northeast wall of Facility	No evidence of spills or releases observed or reported
Cooling Tower	Located outside northwest corner of Facility; cools water used in process to allow for closed-loop recycling/reuse	No evidence of spills or releases observed or reported
Two Former 10,000-gallon Fuel Oil USTs	Located north of 6000-gallon AST and north of Diesel generator; removed in 1987 along with 22 cubic yards of impacted soil	Aug 2012 sampling showed no impact downgradient of these areas
Former Varnish Tank/Vault	No longer in use; located immediately north of diesel generator; approx. 8' length x 8' width x 10' depth; stored varnish	Aug 2012 sampling showed no impact within or downgradient of this area

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 unacceptable risks to human health or the environment from hazardous constituents at this Facility.

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. The EPA has determined that the Facility met these indicators on October 1, 2012.

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: 10/10/12

/Abraham Ferdas/

Abraham Ferdas, Director
Land and Chemicals Division
US EPA, Region III

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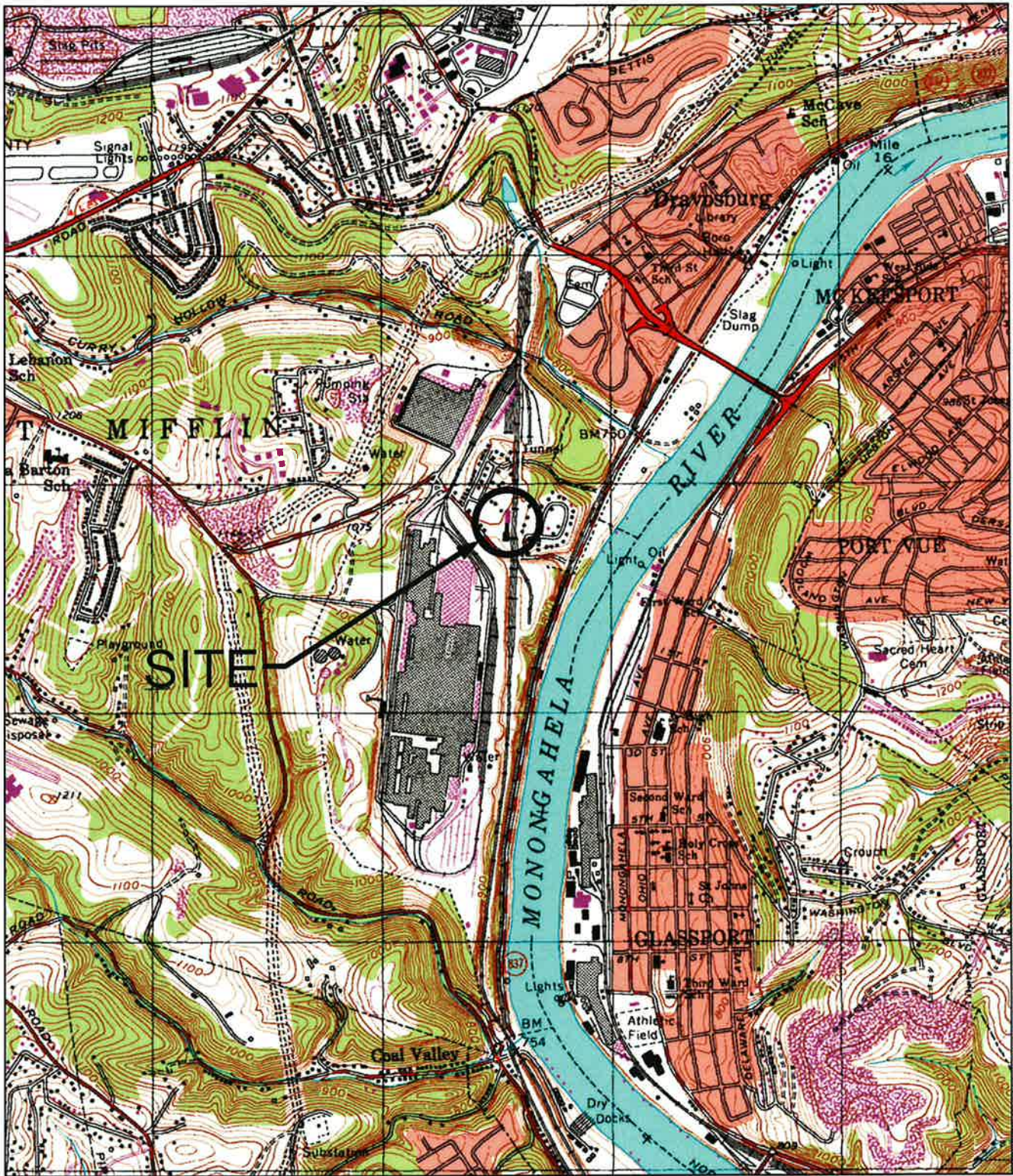
Index to Administrative Record

Proposal for Scope of Work Including Removal of Two 10,000-gallon Fuel Oil Tanks and One Varnish Tank, prepared by PetroClean, June 12, 1987.

Environmental Priorities Initiative Preliminary Assessment of Liberty Polyglass, prepared by NUS Corporation, October 2, 1989.

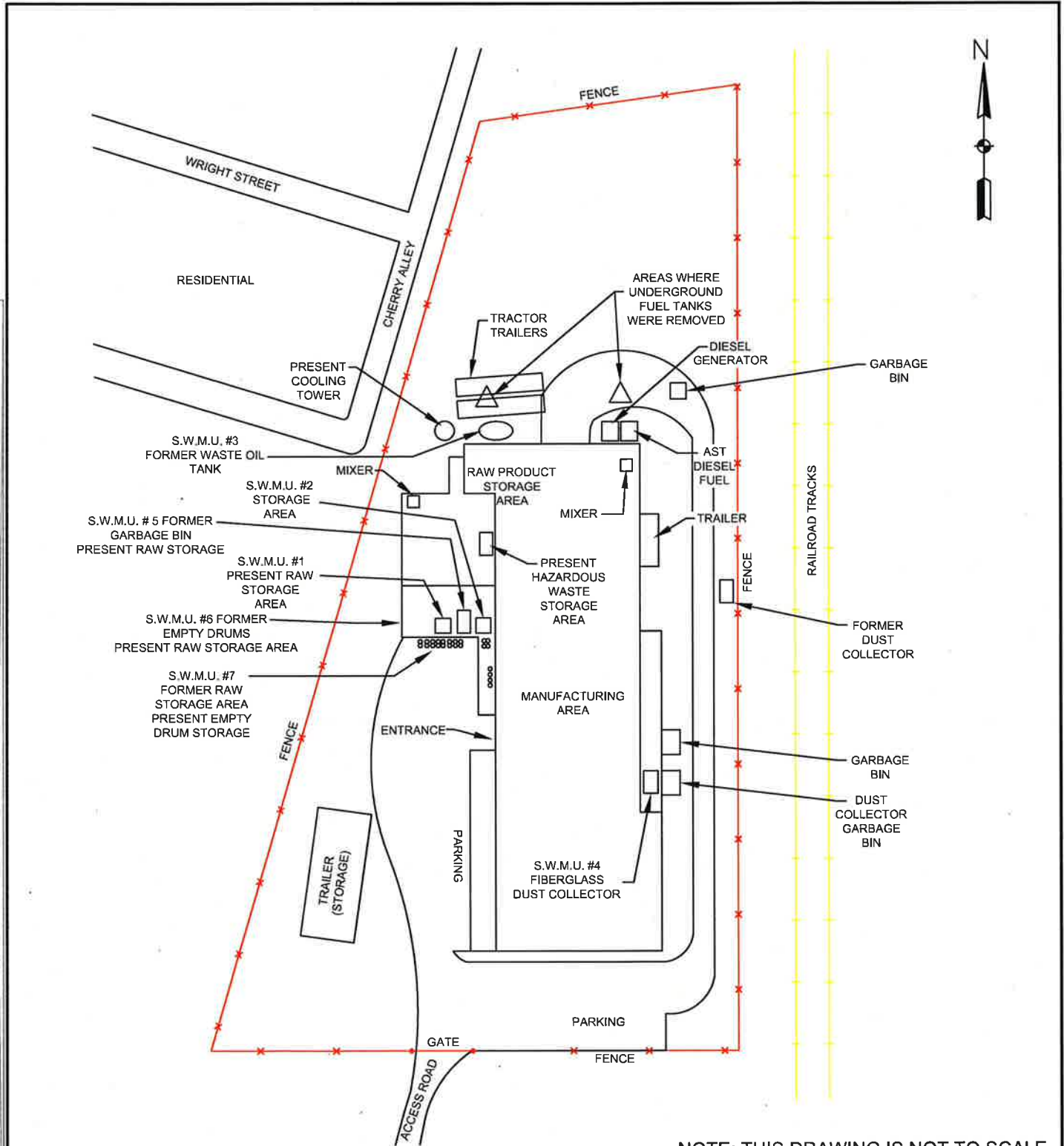
Environmental Indicator Inspection Report for Liberty Pultrusions, 1575 Lebanon School Road, West Mifflin, Pennsylvania 15122, prepared by URS, June 2009.

Field Investigation Letter Report for Liberty Pultrusions Site, prepared by Baker, August 30, 2012.




REFERENCE:
A Portion of USGS 7.5 Minute Topographic Map;
Glassport Quadrangle, Pennsylvania; 1988.

TITLE			
SITE LOCATION MAP			
PROJECT			
Liberty Pultrusions (Polygas) 1575 Lebanon School Rd., West Mifflin, PA 15122			
URS		4507 NORTH FRONT STREET, SUITE 200 HARRISBURG, PENNSYLVANIA 17110 (717) 635-7901 FAX (717) 635-7902 www.urscorp.com	
SCALE	AS SHOWN	DWN. BY	AWJ
DATE	7/02/08	APPR. BY	BLA
		JOB NO.	20497894
		FIG. NO.	1



NOTE: THIS DRAWING IS NOT TO SCALE.

TITLE			
SITE SKETCH			
PROJECT			
Liberty Pultrusions (Polygas) 1575 Lebanon School Rd., West Mifflin, PA 15122			
		4507 NORTH FRONT STREET, SUITE 200 HARRISBURG, PENNSYLVANIA 17110 (717) 635-7901 FAX (717) 635-7902 www.urscorp.com	
SCALE	N.T.S.	DWN. BY	AWJ
DATE	8/18/08	APPR. BY	BLA
		JOB NO.	20497894
		FIG. NO.	3

NOTE:
FIGURE MODIFIED FROM FIGURE 2.2 "SITE SKETCH"
PREPARED BY NUS CORP.