UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

SKF USA INC.

ALTOONA, PA 16601

EPA ID # PAD 004 344 172

TABLE OF CONTENTS

Section		Page
I.	Introduction	1
II.	Facility Background	2
III.	Summary of Environmental History	3
IV.	Evaluation of EPA's Proposed Decision	4
V.	Institutional Control	5
VI.	Environmental Indicators	6
VII.	Financial Assurance	6
VIII.	Public Participation	6

I. Introduction

A. SKF USA Inc.

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the former SKF USA Inc. (SKF) facility located at 1000 Logan Boulevard, Altoona, Pennsylvania 16601 (hereinafter referred to as the Facility).

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 investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property.

Information on the corrective action program as well as a fact sheet for the Facility can be found by navigating http://www.epa.gov/reg3wcmd/correctiveaction.htm.

EPA has prepared this SB in cooperation with the Pennsylvania Department of Environmental Protection (PADEP). EPA and PADEP have worked together under the One Clean Up Program Memorandum of Agreement (MOA) signed by both agencies in April 2004. Under the MOA, the Facility investigation and cleanup was conducted using the technical standards of the Pennsylvania Land Recycling and Environmental Remediation Standards Act (Act 2), 35 P.S. Sections 6026.101 *et seq*. PADEP approved the Facility's Remediation Investigation/Risk Assessment/Final Report on July 3, 2008. EPA reviewed all available site data and has determined that no additional characterization or remediation is necessary for SKF to satisfy its federal RCRA Corrective Action obligations at the Facility. Based on its review, EPA has selected its proposed final remedy for the Facility and is now proceeding with its remedy selection process, including providing opportunity for public comment and review.

B. EPA's Proposed Final Remedy

EPA is proposing a ***Corrective Action Complete with Controls*** determination as the final remedy for the Facility. Based on the work completed to date, EPA has determined that no further actions to remediate soil, groundwater or indoor air contamination are necessary given current land use. EPA's proposed remedy is the implementation of institutional controls to prohibit residential use of the Facility and to prohibit drinking and agricultural use of the groundwater at the Facility unless prior approval is obtained from PADEP.

C. Importance of Public Input

This SB summarizes information that can be found in greater detail in the work plans and reports reviewed by EPA and PADEP. To gain a more comprehensive understanding of the RCRA activities that have been conducted at the Facility, EPA encourages the public to review

these documents, which are found in the Administrative Record. The SB; Index for the Administrative Record, and Administrative Record are available for review at the locations listed in Section VIII (Public Participation), below.

While EPA is proposing a Corrective Action Complete with Controls determination as the final remedy for the Facility, it has not yet made a final decision. The public is encouraged to participate in the remedy selection process by reviewing this SB and documents contained in the Administrative Record and submitting written comments to EPA during the public comment period. Public participation is discussed in more detail in Section VIII, below. After EPA has considered all information submitted during the public comment period, EPA will make a final remedy decision and address all significant comments submitted during the public comment period in a Final Decision and Response to Comments. If EPA determines that new information or public comments warrant a modification to its proposed decision, EPA will modify the proposal or select other remedial alternatives based on such new information and/or public comments.

II. Facility Background

The Facility occupies an 18.803-acre tract of land including Parcel #1 and Parcel #2. Parcel #1 consists of a 15.143-acre tract which includes an approximate 225,000 square foot structure used for manufacturing and office space. (See Attachments 1 and 2). Parcel #1 is bordered to the north by M&T Bank; to the south by the Five Star Suzuki property (Parcel #2) and the Penelec property; to the west by Plank Road and to the east by Logan Boulevard. Neighboring properties are primarily commercial, with residential areas located to the west of Plank Road and to the east of Logan Boulevard. Topographically, Parcel #1 is flat with surface drainage generally to the west toward Plank Road.

Parcel #2 consists of a 3.66–acre tract that is currently owned by the Five Star Suzuki. There were no releases documented from Parcel #2.

The Facility was owned and operated by a division of SKF, the SKF Ball Bearings Division, from approximately 1951 to 2005. Before 1951, the Facility was used as a shirt factory (June 5, 1991 Environmental Priorities Initiative Preliminary Assessment of SKF Ball Bearing Division prepared by NUS Corporation). Under the ownership and operation of SKF, the Facility manufactured ball bearings until it closed in December 2004. In June 2005, the Facility was sold to 800 Logan Boulevard LP.

During SKF's manufacturing process, machining, heat treating, grinding, honing, assembly and packaging operations were performed. These operations generated wastes including waste hydraulic oil, synthetic coolant, cutting oil, machining chips, grinding scrap, spent solvents, and acid. As a result of these operations, soil and groundwater at Parcel #1 became contaminated with volatile organic compounds (VOCs) and petroleum hydrocarbons.

Geologic logs obtained from test borings drilled as part of the soil contamination assessment indicate the overburden penetrated consists primarily of unconsolidated silts and clays with some sand and gravel. The average thickness of the overburden is 12-14 feet. Published geologic data indicate Parcel #1 is underlain by the Wills Creek Formation which consists of thin, fissile, calcareous, gray shale with thin layers of interbedded limestone near the base and throughout the formation. The formation ranges from 400 - 750 feet in thickness. Groundwater found within the formation is highly mineralized containing 1,000 - 2,500 parts per million (ppm) of dissolved solids largely due to calcium sulfate (gypsum) in the bedrock. These conditions render the aquifer undesirable as a source of drinking water. The depth to groundwater beneath Parcel #1 ranges from 6 to 11 feet below the surface. Groundwater flow is toward the northwest (October 1988 Groundwater Quality Assessment plan prepared for SKF USA by Lancy Environmental Services Company).

III. Summary of Environmental History

EPA's corrective action program seeks to identify areas of industrial properties where hazardous wastes or hazardous constituents were released. At the SKF facility, two areas were identified as having been impacted by petroleum hydrocarbons and chlorinated solvents. These areas were referred to as the Underground Storage Tank Area and the Former Swarf Press Area. SKF removed 403 tons of contaminated soils from these areas. The areas were then either re-seeded or paved over (January 1991 Underground Storage Tank Closure Report, SKF Industries, Inc. Altoona, PA prepared by Mountain Search, Inc.; June 3, 1994 Former Swarf Press Area Closure Report prepared by Law Environmental). Sampling results demonstrate that these areas now meet applicable Pennsylvania standards for non-residential use.

Groundwater beneath the Facility remains contaminated with low levels of various organic chemicals. These levels are above both EPA drinking water standards (established by the Safe Drinking Water Act, 42 U.S.C. Section 300g-l) and Pennsylvania's non-residential concentrations (established under Act 2 State-Wide Health Standards, Title 25 Chapter 250.301) (February 28, 2008 Combined Remedial Investigation Report, Risk Assessment Report, and Final Report, Former SKF USA, Inc. Facility, Altoona PA).

Under PADEP oversight, SKF maintained and operated a pump-and-treat groundwater remediation system at the Facility from March 1995 to November 2006. The groundwater recovery system was effective in limiting the expansion of the groundwater plume. Furthermore, the groundwater remediation system mitigated much of the dissolved-phase chlorinated hydrocarbon impact to groundwater in the northern portion of the Facility. The historical analytical groundwater monitoring data shows that concentrations of target constituents generally decreased during the period of operation.

In May 2006, enhanced fluid recovery activities were implemented to extract residual free-phase petroleum product from fine-grained soil in the vicinity of monitoring well MW-3. Four hundred and fifty gallons of product and groundwater were extracted from the subsurface soil. The recovery was effective in reducing residual product in subsurface soil.

From June 2006 to March 2007, SKF implemented in-situ chemical oxidation of chlorinated compounds in an effort to address further the dissolved-phase chlorinated hydrocarbon groundwater impacts on the northern portion of the Facility. Following the in-situ chemical oxidation, SKF performed groundwater fate and transport modeling to determine if affected groundwater was migrating off-site at unacceptable concentrations.

The results from the groundwater modeling showed that 5 compounds, 1,1-DCA, 1,2-DCA, 1,1-DCE, 1,4-dioxane, and methylene chloride, were not migrating off-site at levels of concern. Five additional compounds, cis-1,2-DCE, PCE, 1,1,1-TCA, TCE, and vinyl chloride, were demonstrated to fall below drinking water standards at distances ranging from 5 to 134 feet beyond the Facility boundary. Based on these groundwater modeling results, PADEP approved the groundwater cleanup. EPA concurs with this decision (February 28, 2008 Combined Remedial Investigation Report, Risk Assessment report, and Final Report, Former SKF USA, Inc. Facility, Altoona, PA ; PADEP's approval of Remedial Investigation/Risk Assessment/Final Report, PADEP Letter dated July 3, 2008).

SKF conducted an ecological receptor evaluation at the Facility in 2008. After reviewing that evaluation, PADEP and EPA determined that no complete exposure pathways exist for groundwater for ecological receptors either on or off the Facility.

SKF also conducted a vapor intrusion risk assessment as part of their investigation. That assessment showed that levels of indoor vapor expected above the groundwater plume are below Act 2 residential site-specific standards.

IV. Evaluation of EPA's Proposed Decision

This section provides a description of the criteria EPA uses to evaluate proposed final remedies under the Corrective Action Program. The criteria are applied in two phases. In the first phase, EPA evaluates three criteria, known as Threshold Criteria. In the second phase, EPA sometimes uses seven balancing criteria to select among alternative solutions. SKF has demonstrated attainment of the site-specific standards under Act 2. After EPA reviewed all site data, it is proposing that no further actions to remediate soil, groundwater or indoor air contamination are necessary given current land use. Because EPA is not selecting among alternatives, a complete evaluation of the balancing criteria is not necessary.

The following is a summary of EPA's evaluation of the Threshold Criteria:

1. <u>Protect Human Health and the Environment</u> - This overarching criterion requires remedies to protect human health and the environment from exposure to contamination. EPA's proposed **Corrective Action Complete with Controls** determination meets this standard. SKF excavated and disposed off-site contaminated soils exceeding the applicable Act 2 SHS for all organic compounds and has remediated on-site groundwater to attain the Act 2 health-based Site – Specific Standards. In addition, an environmental covenant has been placed on the deed to the Facility property which restricts which restricts residential land use and domestic and agricultural

uses of groundwater at the Facility to prevent human exposure while contaminants remain in place.

2. Achieve Media Cleanup Objectives - This criterion addresses whether EPA's proposed remedy meets the appropriate cleanup objectives based on assumptions regarding current and reasonably anticipated land and water resource use(s). As stated above, SKF has removed contaminated soils above applicable Act 2 SHS for all organic compounds and has remediated groundwater to attain a site-specific standard under Act 2 which is EPA's media cleanup objective for the Facility. Given the current and anticipated land and water resource use at the Facility, EPA's proposed remedy meets the media cleanup objectives for the Facility. Moreover, EPA's proposed remedy requires the implementation of institutional controls to restrict residential land use and potable uses of the groundwater at the Facility to prevent human exposure while contaminants remain in place.

3. Remediating the Source of Releases - By applying this criterion, 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. SKF has remediated the sources of releases at the Facility by removing contaminated soils, removing free product atop the groundwater surface, and implementing in-situ chemical oxidation of chlorinated compounds to address the dissolved-phase chlorinated hydrocarbon groundwater that was impacting the northern portion of the property.

V. Institutional Controls

Because concentrations of contaminants remain in the groundwater and soil at the Facility above levels appropriate for residential and domestic uses, EPA proposes that, as the final remedy, SKF implement institutional controls to restrict use of Facility property and groundwater while those media remain contaminated. Institutional Controls are generally non-engineered instruments such as administrative and/or legal controls that minimize the potential for human exposure to contamination by limiting land or resource use. The proposed ICs are:

1. The groundwater at and under the Facility shall not be used for any drinking or agricultural purpose unless written approval for such use is received from PADEP.

   and

2. The Facility shall be not be used for residential purposes.

An environmental covenant containing these restrictions was entered into by PADEP, SKF and 800 Logan Boulevard LP, under the provisions of the Pennsylvania Uniform Environmental Covenants Act, 27 Pa. C.S. Sections 6501-6517, and has been recorded with the deed for the Facility property. If SKF or 800 Logan Boulevard LP fail to meet their obligations under the environmental covenant or EPA, in its sole discretion, deems that additional institutional controls are necessary to protect human health or the environment, EPA has the authority to require and enforce additional institutional controls.

VI. 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 for each facility: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control. SKF is one of Region III's high priority facilities and falls under GPRA. On July 31, 2008, EPA determined that the Facility had met both environmental clean-up indicators.

VII. Financial Assurance

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed remedy at the Facility. Given that EPA's proposed remedy does not require any further actions to remediate soil or groundwater, EPA is proposing that no financial assurance be required.

VIII. Public Participation

EPA is requesting comments from the public on its proposal to select a Corrective Action Complete with Controls determination as the final remedy for the Facility. On September 11, 2008, EPA placed an announcement in the local newspaper, Altoona Mirror, to notify the public of the availability of this Statement of Basis, its supporting Administrative Record and the public's opportunity to request a public meeting on EPA's proposed final remedy for the Facility. The public comments period will last for thirty (30) calendar days beginning September 11, 2008 and ending October 10, 2008. Comments should be sent to EPA in writing at the EPA address listed below, and all commentors will receive a copy of the Final Decision and Response to Comments.

A public meeting will be held on request. Requests for a public meeting should be made to Ms. Tran Tran of the EPA Regional Office at the address and phone number listed below.

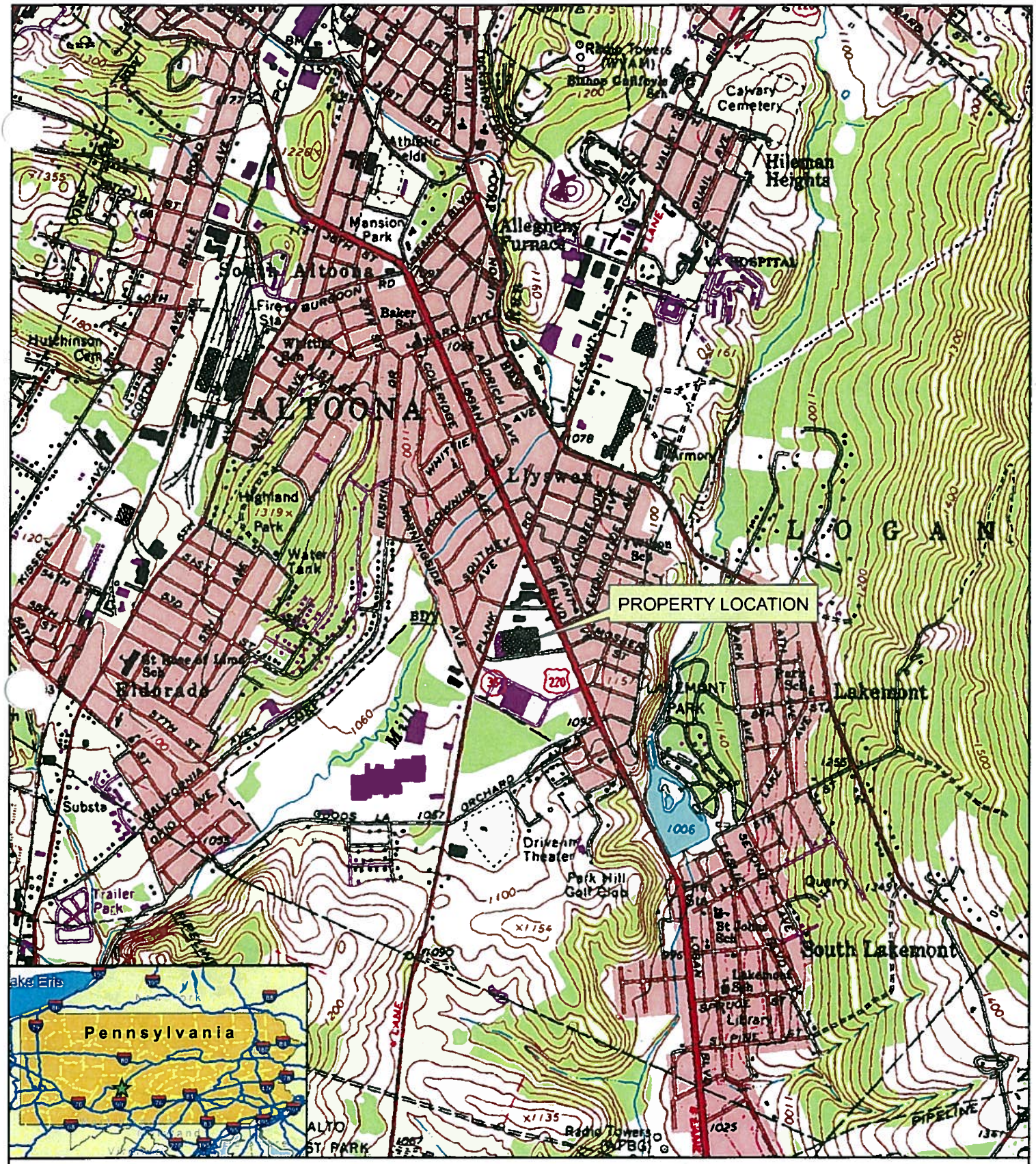
The Administrative Record contains all information considered when making this proposal. The Administrative record is available for review during business hours at the two following locations:

U.S. Environmental Protection Agency
Region III (3LC30)
1650 Arch Street
Philadelphia, PA 19103
Contact: Tran Tran
Phone: 215-814-2079
Fax: 215-814-3113
E-mail: trantran@epa.gov

Altoona Area Public Library
1600 5th Street, Altoona, PA 16602
Phone: (814) 946-0417
Hours: Monday - Thursday: 9:30 am - 9:00 pm
Friday & Saturday: 9:00 am - 5:00 pm

Altoona Area Public Library Sunday: 1:00 pm-4:00 pm

Following the thirty-day public comment period, EPA will prepare a Final Decision and Response to Comments (FDRTC) in which it will identify the final remedy for the Facility. The FDRTC will address all significant written comments and any significant oral comments generated at a public meeting if a meeting is held. The FDRTC will be made available to the public. If, on the basis of such comments or other relevant information, significant changes are proposed to be made to the remedy for the Facility as proposed by EPA in this Statement of Basis, EPA will seek additional public comments on any proposed revised remedy.



SKF USA Inc.
1000 Logan Boulevard
Altoona, Pennsylvania

N

0 0.25 0.5 0.75 1 Mile

DATE: February 19, 2008	PROJECT NO.: Y3062119.C		FIGURE 2-1: TOPOGRAPHIC PROPERTY LOCATION MAP
ENVIRONMENTAL STANDARDS	DRAWN BY: SMG	APPRV'D BY: NONE	
	CHEK'D BY: NONE	REVISION: 0	SKF USA INC. ALTOONA, PENNSYLVANIA

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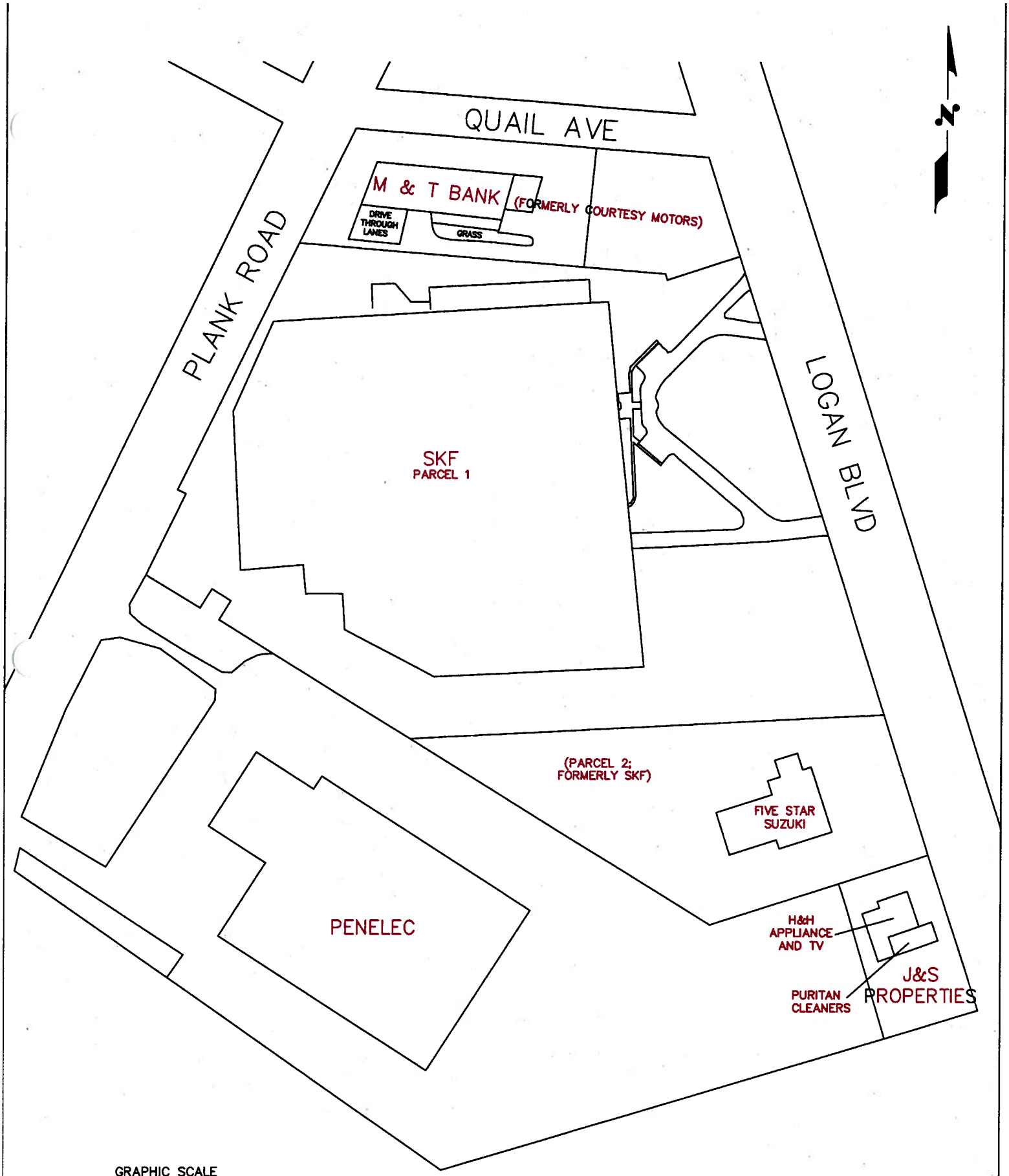
Attachment 1



DATE:	PROJECT NO.:		FIGURE 2-2: SKF PROPERTY AND NEIGHBORING PROPERTIES MAP
Feb. 19, 2008	Y3062119		
ENVIRONMENTAL STANDARDS	DRAWN BY: SMG	APRV'D BY: NONE	
	CHEK'D BY: HAB	REVISION: 0	SKF USA INC. ALTOONA, PENNSYLVANIA

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Attachment 2