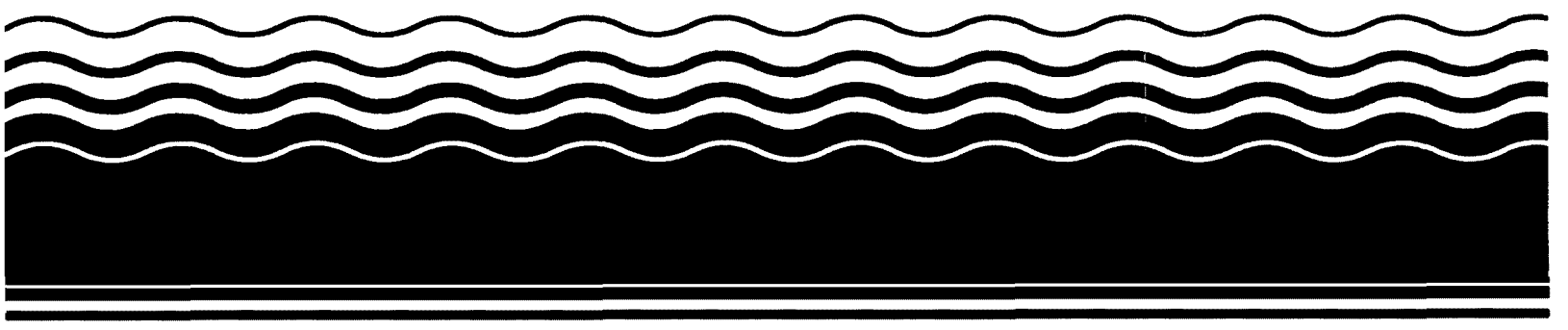
EPA/ESD/R02-95/252
October 1995

EPA Superfund
Explanation of Significant Difference for the Record of Decision:

FAA Technical Center, Area 20A Salvage Yard Area, Atlantic City International Airport, NJ 6/18/1995



EXPLANATION OF SIGNIFICANT DIFFERENCES

AREA 20A, SALVAGE YARD AREA

FAA TECHNICAL CENTER
ATLANTIC CITY INTERNATIONAL AIRPORT, NEW JERSEY

JUNE 1995

I. Introduction

The purpose of this Explanation of Significant Differences (ESD) is to explain modifications to the soil remedy selected in the Record of Decision (ROD), signed on September 28, 1990, for Area 20A, the Salvage Yard Area of the Federal Aviation Administration (FAA) Technical Center at Atlantic City International Airport, New Jersey. This ESD modifies the ROD to require landfilling of a substantial portion of PCB-contaminated soil instead of incineration of all PCB-contaminated soils. FAA, as lead agency, developed this ESD, with support from the U.S. Environmental Protection Agency (EPA). The New Jersey Department of Environmental Protection (NJDEP) has reviewed and approved of this ESD. FAA issues this ESD in accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended, 42 U.S.C. § 9617(c) and Section 300.435(c)(2)(i) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. 300.435(c)(2)(i). These regulations require that, if after the adoption of a ROD, an action is proposed which differs significantly but does not fundamentally alter the remedy selected, an explanation of significant differences and the reasons such changes were made must be published by the lead agency, FAA.

The Explanation of Significant Differences will become part of the Administrative Record for Area 20A of the FAA Technical Center. The entire Administrative Record for the site, which includes the Remedial Investigation (RI) Report, Feasibility Study (FS) Report, Proposed Plan, ROD and other documents related to the site, is available for review at the following location:

Atlantic County Library
2 South Farragut Avenue
Mays Landing, NJ 08330
(609) 625-2776

Should there be any questions regarding this Explanation of Significant Differences, please contact:

Mr. Keith Buch, COTR
FAA Technical Center
ACM-440
Building 270, Room A117
Atlantic City International Airport, NJ 08045
(609) 485-6644

II. Summary of Site History, Contamination Problems, and Selected Remedy

The FAA Technical Center covers an area of approximately 5,000 acres on a site in southeastern New Jersey, 8 miles northwest of Atlantic City (see Figure 1). Installations on the property include the Atlantic City International Airport, a New Jersey Air National Guard station, and the extensive facilities of the FAA Technical Center. The Atlantic City municipal water supply is provided by nine ground water production wells located just north of the Upper Atlantic City Reservoir on FAA property as well as by water drawn directly from the Atlantic City Reservoirs. The reservoirs are fed by the North and South Branches of Doughty's Mill Stream, which cross portions of the Technical Center grounds. The public water supply facilities are managed by the Atlantic City Municipal Utilities Authority (ACMUA).

Area 20A is one of more than 20 areas of concern currently being investigated at the FAA Technical Center; its location is indicated in Figure 2. Area 20A consists of two adjacent salvage yards associated with FAA Buildings 206 and 207 (Figure 3). Area 20A, which is fenced and located approximately 1,600 feet south of the Upper Atlantic City Reservoir, is currently used for storage of old aircraft parts, trucks and cars, scrap metal, and empty 55-gallon drums.

In 1983, R.F. Weston conducted an initial study for ACMUA which showed the presence of deteriorated and leaking drums in the northern half of the Salvage Yard Area, with evidence of past spillage (i.e. visibly stained surface soils). The FAA's Environmental Investigation (EI) of Area 20A was conducted in two phases between December 1986 and December 1988. The Phase I EI identified the presence of high PCB levels in the soil and volatile organic ground water contamination in the vicinity of the Salvage Yard. Phase II EI results delineated the extent of contamination in both media.

The ROD for Area 20A included the excavation of approximately 930 cubic yards of soil with transport off-site for incineration at a permitted rotary kiln incinerator and air stripping of organic compounds present in the ground water.

III. Description of Significant Differences and the Basis for those Differences

During the remedial design of the soil remediation portion of the ROD for Area 20A, it was determined that a new approach was warranted based on additional information which was not available at the signing of the ROD. This information included revised soil cleanup criteria, limitations on the rate at which the incinerator could accept the soil for treatment, and existing backlogs at incinerator facilities. These factors are described in more detail below:

Revised Soil Cleanup Criteria - Based on newly developed NJDEP soil cleanup criteria, the state's cleanup level for PCBs in surface soil is 2 parts per million. FAA has volunteered to meet this new criteria at Area 20A, even though the ROD included a cleanup level of 5 ppm PCBs for the top 6 inches of soil and a cleanup level of 25 ppm PCBs for soils at greater depths. To meet the revised cleanup criterion, the estimated volume of soil requiring remediation increased by 45% (i.e., from 930 cubic yards to 1,450 cubic yards), thereby significantly increasing both the implementation period and cost of incineration under the ROD soil remedy.

Limitations on Soil Acceptance Rate - It was determined during the remedial design that the receiving incinerator would accept contaminated soils more slowly than originally anticipated (due to the soils' low BTU value), thereby delaying the implementation of the ROD soil remedy.

Incinerator Backlogs - Incineration facilities were also experiencing backlogs in terms of their ability to accept wastes for treatment, due to an overall national shortage of incinerator capacity, thereby delaying implementation of the ROD soil remedy.

Based upon a consideration of these factors, it became apparent that significant delays and increased costs would result if the ROD soil remedy were implemented. However, if a portion of the PCB-contaminated soils were landfilled within a TSCA-regulated landfill rather than incinerated, significant reductions in the implementation time period as well as the associated cost for the remedial action could be realized. This revision to the remedy was initially proposed in a letter from TRC Environmental Corporation (TRC) to EPA dated July 20, 1992. Prior to finalizing such a proposal, however, a determination of whether the contaminated soils would meet land disposal restrictions was required.

FAA conducted sampling and analysis of surface soils to provide additional information as to whether the contaminated soils could be landfilled. The existing land disposal restrictions prohibit landfilling of soils that are characteristically hazardous, as defined by the Toxicity Characteristic Leaching Procedure (TCLP) analysis. In addition, land disposal restrictions prohibit land disposal of soils characterized as hazardous wastes that contain total halogenated organic compounds (THOC) at concentrations greater than 1,000 parts per million (ppm).

Laboratory results of this additional sampling and analysis, as presented in the PCB-Contaminated Soils Investigation Report, Area 20A - Salvage Yard, October 1993 (TRC, January 1994), indicated that no surface soil samples were characteristically hazardous and that THOC concentrations of the surface soils were below 1,000 ppm. Accordingly, the surface soils samples do not fall within the land disposal restrictions and therefore can be landfilled at TSCA disposal facilities instead of incinerated. The EPA reviewed and approved of the sampling results. While the surface soil samples analyzed as part of the PCB-contaminated soils investigation did not fall under land disposal restrictions, subsurface soils sampled during the EI in a former underground waste oil storage tank area exhibited PCB contaminant levels as high as 1,400 ppm (the highest level of PCB contamination detected at the site). If these soils are determined to be hazardous upon excavation and the presence of THOC levels greater than 1,000 ppm is confirmed, the soils will require incineration, in accordance with the land disposal restrictions and the soil remedy as outlined in the ROD. The supporting documents, as described above, are available in the Administrative Record at the Atlantic County Library.

On the basis of the additional surface soil sampling results, the development of this Explanation of Significant Differences was proposed in a letter from TRC to the FAA dated March 14, 1994. The soil remediation portion of the ROD for Area 20A is being changed from incineration of all PCB-contaminated soils to off-site land disposal of PCB-contaminated soils in combination with incineration of those soils which cannot be landfilled due to land disposal restrictions. The ground water remedy will remain unchanged. As discussed above, the change in remedy will reduce both implementation time period and the cost. The period of implementation will be reduced, since soils to be landfilled can be readily transported via roll-off containers to the receiving TSCA-regulated landfill. Landfill disposal is preferable to incineration, which requires loading soil into individual drums, slow incinerator feed rates, and delays due to limited incinerator capacities. The remedial cost will also decrease, from an estimated range of $6.3 to $7 million for incineration of all PCB-contaminated soils at Area 20A, to an estimated range of $1.2 to $1.6 million for landfilling of all surface soils and incineration of a portion of PCB-contaminated soils.

IV. Support Agency Comments

On August 18, 1992, NJDEP indicated in a letter that it would support modifying the ROD to require off-site disposal of PCB-contaminated soils which are not subject to land disposal

restriction, at a TSCA-approved landfill. The EPA indicated its support for the development of this Explanation of Significant Differences in a letter dated June 29, 1994.

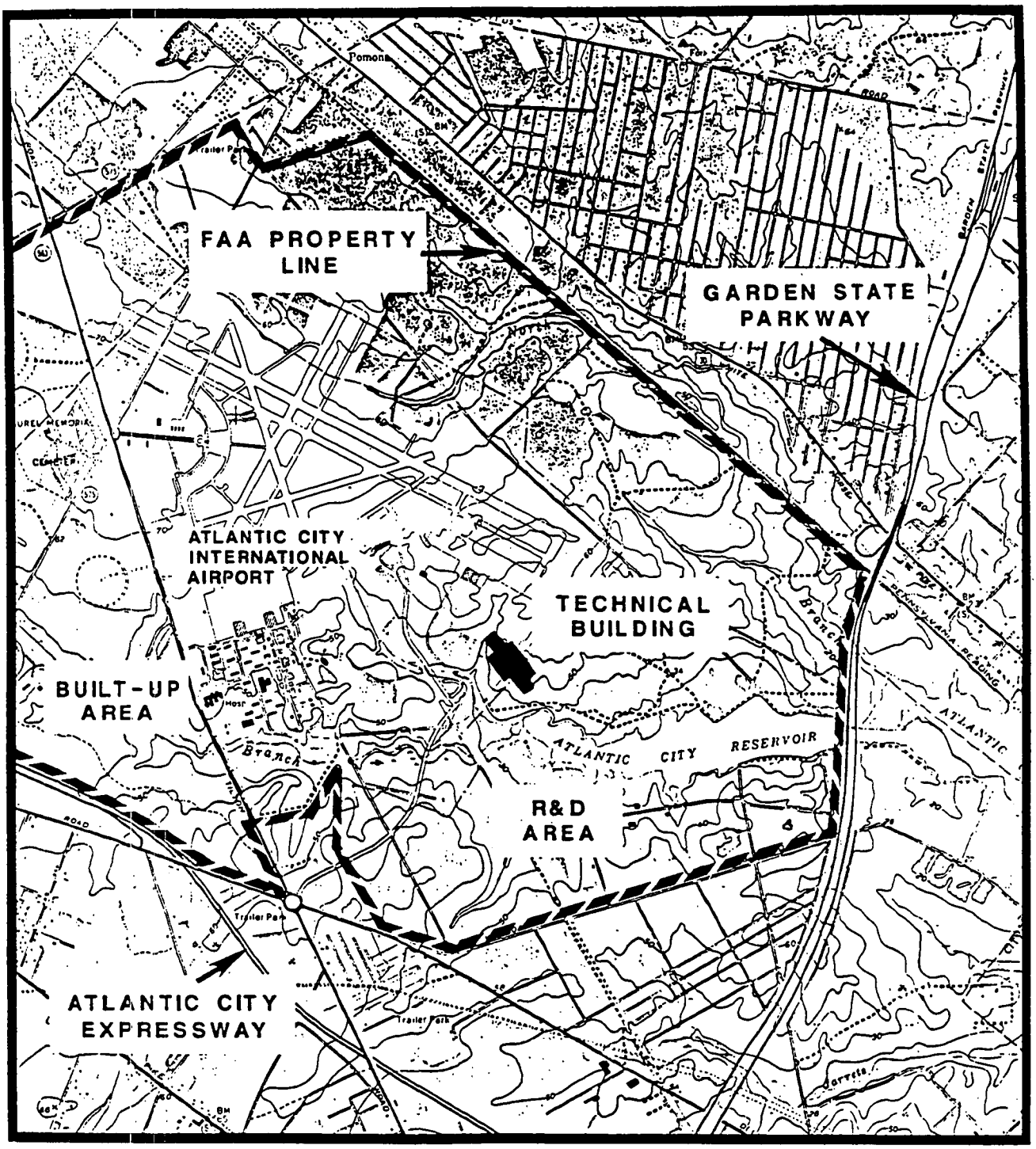
V. Affirmation of the Statutory Determinations

While the soil remedy for Area 20A PCB-contaminated soils is being changed from incineration to land disposal for a majority of the PCB-contaminated soils, those soils which present a principal threat, based on RCRA hazardous waste definitions and land disposal restrictions, will still require treatment by incineration. This approach will maintain consistency with the expectation of Superfund that principal threats at a site should be treated and will not fundamentally change the remedy, since incineration will be retained as a component of the PCB-contaminated soil remedial action.

Considering the new information that has been developed and the changes that have been made to the selected soil remedy, the FAA, with support from EPA, believes that the remedy remains protective of human health and the environment, complies with federal and state requirements that are applicable or relevant and appropriate to this remedial action, and is cost-effective. In addition, the revised remedy utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable for this site.

VI. Public Participation Activities

The Administrative Record for Area 20A, including the information which supports this Explanation of Significant Differences, is available at the Atlantic County Library for public review. Public notice of this Explanation of Significant Differences has been published in a major local newspaper as required by the NCP Section 300.435(c)(2)(i). It appeared in the Atlantic City Press on July 6, 1995.



PLEASANTVILLE, NJ QUADRANGLE
USGS 7.5 MINUTE SERIES TOPOGRAPHIC

0 1000 5000

SCALE, FEET

FIGURE 1. FAA TECHNICAL CENTER

AREA 20A LOCATION MAP

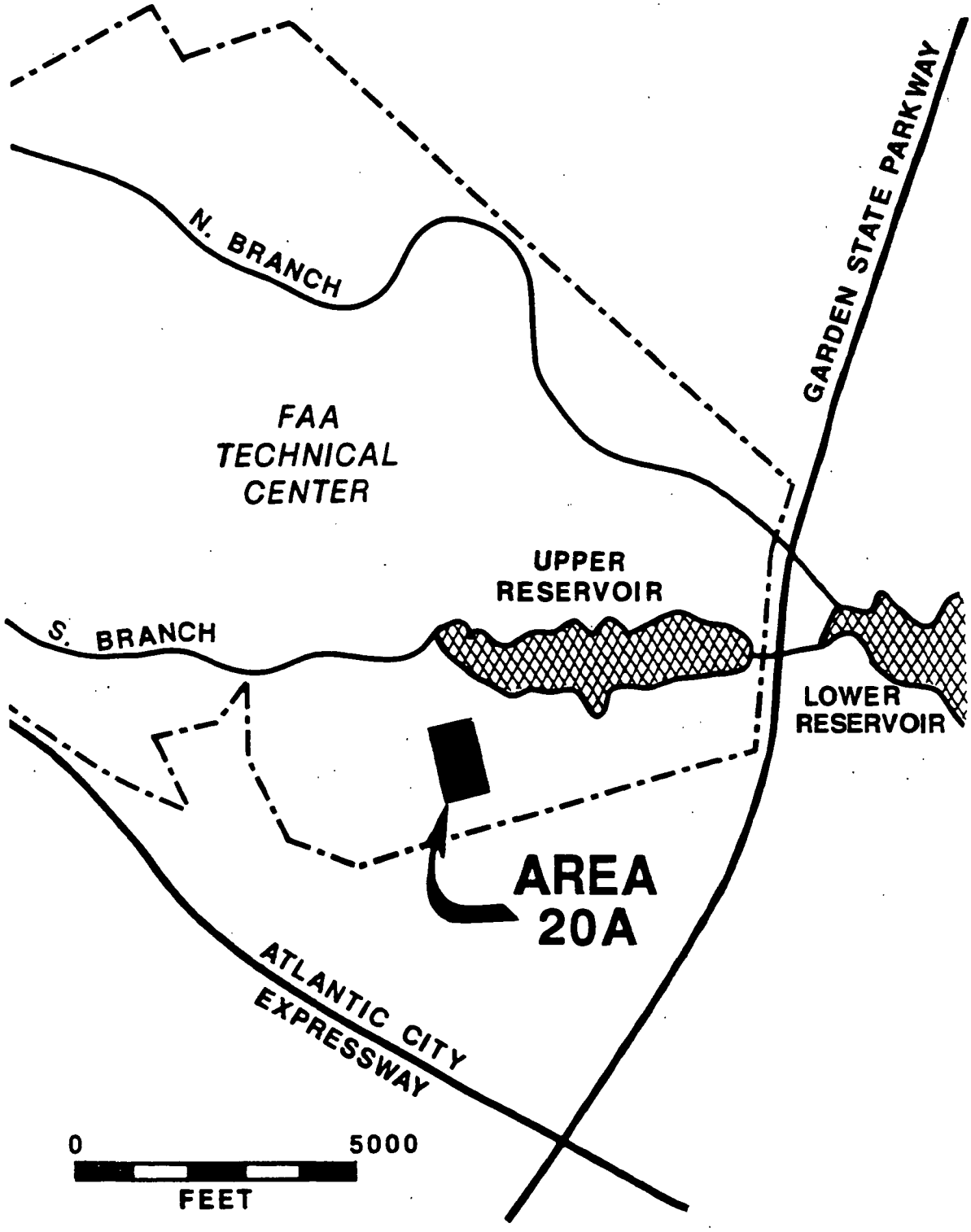


FIGURE 2.

AREA 20A LAYOUT

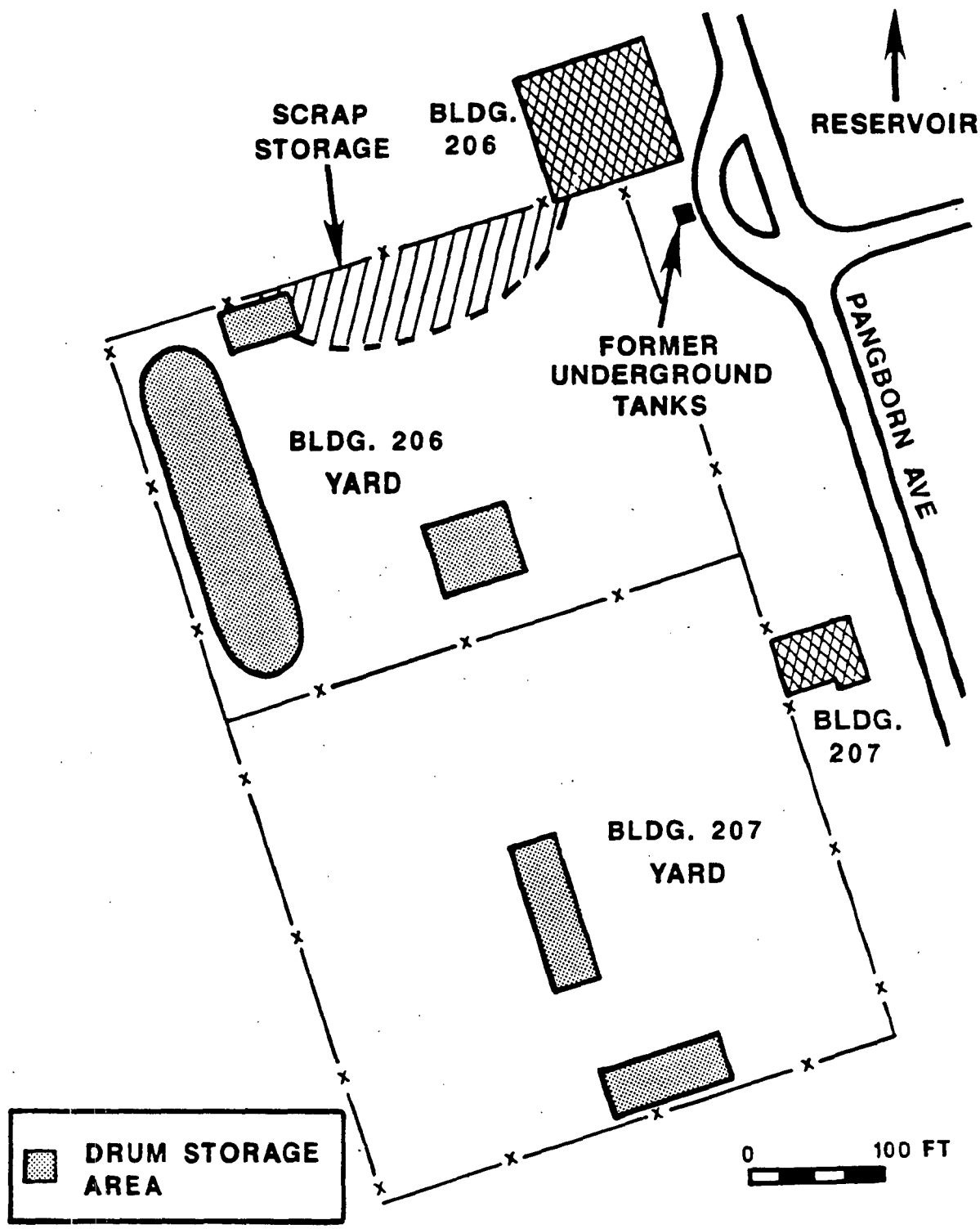


FIGURE 3.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

JUN 19 1995
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gary E. Poulsen, P.E.
Manager, Plant Engineering and Operations Division
FAA Technical Center
ACM-400
Atlantic City International Airport, NJ 08405

Re: **DRAFT FINAL EXPLANATION OF SIGNIFICANT DIFFERENCES & DRAFT PUBLIC NOTICE - AREA 20A, SALVAGE YARD**

Dear Mr. Poulsen:

EPA has reviewed the Revised Draft Final Explanation of Significant Differences (ESD) and Revised Draft Public Notice for FAA's Area 20A Salvage Yard, submitted by TRC Environmental Corporation on behalf of the Federal Aviation Administration Technical Center via letter dated April, 28, 1995. The ESD has been prepared to explain a modification of the Record of Decision (ROD) for Area 20A, signed on September 28, 1990. The ESD modifies the ROD by allowing disposal of a portion of PCB-contaminated soils at a TSCA landfill, rather than requiring that all PCB contaminated soils be incinerated. Reductions in remedial action costs and implementation time will be realized with this modification.

Based upon EPA's review and comments on previous iterations of the Area 20A ESD, EPA hereby concurs with the technical approach and language found in the April 1995 Revised Draft Final ESD and Revised Draft Public Notice. If you have any questions please call Robert Wing, Federal Facility Section Chief (212) 637-4332.

Sincerely,

Jeanne M. Fox
Regional Administrator

cc: R. Shinn, NJDEP

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State of New Jersey
Department of Environmental Protection

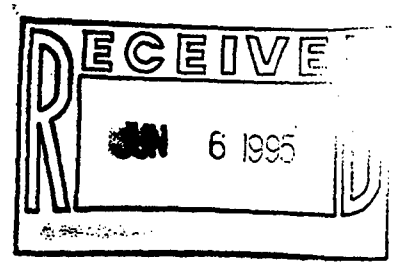
Christine Todd Whitman
Governor

Robert C. Shinn, Jr.
Commissioner

Mr. Keith Buch
FAA Technical Center
Environmental Programs Branch
ACM-440
Atlantic City International Airport, N.J. 08405

JUN 0 2 1995

Mr. Vincent Petrozullo
USEPA - Region II
290 Broadway Avenue
New York, NY 10007-1866



Dear Messrs. Buch and Petrozullo,

Re: Area 20A ESD
FAA Technical Center
Egg Harbor Township, Atlantic County

The NJDEP has reviewed the draft Explanation of Significant Differences (ESD) dated April 1995, for Area 20A (Salvage Yard Area) of the FAA Technical Center Superfund Site located at the Atlantic City International Airport, New Jersey and we approve the document as submitted.

Background

Area 20A, the Salvage Yard Area, has been found to contain contaminated soils with high levels of PCBs and related contaminants, as well as ground water with significantly elevated volatile organic contamination. The Record of Decision (ROD) for the site required the excavation of approximately 930 cubic yards of soil with transport off-site for incineration at a permitted rotary kiln incinerator. The ground water is to be pumped and treated in an on-site ground water treatment system comprising of an air stripper for the removal of organic compounds. This ESD addresses only the soil portion of the remedial action, the ground water remedial action remains unchanged.

The ESD

The ESD states three basic reasons for its execution; Revised soil cleanup criteria, limitations on soil acceptance rate, and incinerator backlogs.

Revised criteria. Since the signing of the ROD, the NJDEP has revised the soil cleanup criteria for non-residential use. The revised criteria for PCBs has changed from 5 ppm to 2 ppm. This change has resulted in an additional 520 cubic yards of PCB contaminated soils in need of remediation.

Limited soil acceptance rate. The low BTU value of the soils will result in a slower acceptance/treatment of PCB contaminated soils than originally estimated in the ROD.

Incinerator backlog. Due to an overall national shortage of incinerator capacity, there could be significant problems and delays carrying out the ROD soil remedy.

Changing the remedial option will result in incineration of only those soils which are determined to be hazardous and contain total halogenate organic compounds (THOC) at greater than 1,000 ppm. Those soils not above the land disposal restriction criteria will be landfilled at a TSCA regulated landfill. Additionally, through the ESD, the FAA has voluntarily agreed to meet the NJDEP soil cleanup criteria for PCBs established after the ROD. This non-residential cleanup criteria is 2 parts per million (ppm), while the ROD required for the cleanup of PCB contaminated soils to 5 ppm. This will increase the volume of soil requiring remediation by 45%, from 930 cubic yards to 1,450 cubic yards.

The changes in the remedy will result in a reduction of both implementation time and cost (from $6.3 to $7.0 million for incineration to an estimated range of $1.2 to $1.6 million for landfilling).

Based on our review, this document has no significant changes to the document reviewed, commented on and approved in August 1994, therefore, the NJDEP approves of this version of the ESD and looks forward to the remediation of this site.

If you should need any assistance or additional information, please feel free to contact me a (609) 633-1455.

Sincerely,

Bruce Venner, Chief
Bureau of Federal Case Management

cc. Steven Byrnes, BEERA
George Nicholas, BGWPA

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ESD FACT SHEET

SITE

Name:	FAA Technical Center, Area 20A - Salvage Yard
Location/State:	Atlantic County, New Jersey
EPA Region:	US EPA Region II
HRS Score & date:	39.65 - 12/09/88
Site ID #:	NJ9690510020

ESD

Date Signed:	June 18, 1995
Remedies:	off-site landfill & incineration
Operating Unit #:	OU-02
Capital cost:	$1.6 million (in 1995 dollars)

LEAD

Remedial:	Federal Facility (Federal Aviation Administration)
Primary contact:	Keith Buch, FAA Project Manager 609/485-6644
Secondary contact:	Betsy Donovan, EPA Project Manager 212/637-4303

WASTE

Type:	PCBs
Medium:	soil
Origin:	drum & waste oil storage
Estimated quantity:	930+ cubic yards