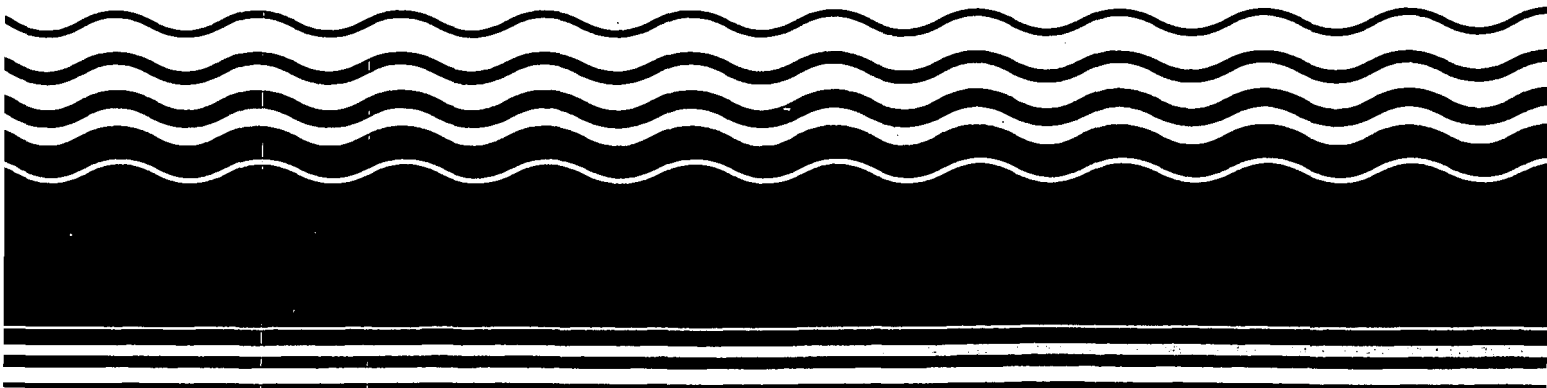


**PB96-963119
EPA/ESD/R03-96/232
December 1996**

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

**Bendix Flight Systems Division,
Bridgewater Township, PA
12/1996**



**EXPLANATION OF SIGNIFICANT DIFFERENCES
BENDIX FLIGHT SYSTEMS DIVISION SUPERFUND SITE
SOUTH MONTROSE, SUSQUEHANNA COUNTY, PENNSYLVANIA**

A. Introduction

The Environmental Protection Agency, Region III (EPA) is issuing this Explanation of Significant Differences (ESD), pursuant to its authority in Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. § 9617(c), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), at 40 C.F.R. § 300.435(c)(2)(i), for the September 30, 1988, Record of Decision (ROD) (no. 197, Section III, in the Administrative Record Index for the Site) issued for the Bendix Flight Systems Division Superfund Site (Site) in South Montrose, Pennsylvania. EPA is the lead agency for the Site and the Pennsylvania Department of Environmental Protection (PADEP) is the support agency. EPA has identified an aspect of the Site remedy that is appropriate to change through this ESD. EPA has determined that this change does not fundamentally alter the remedy selected in the ROD with respect to scope, performance, or cost. This ESD will become part of the administrative record file located in EPA Region III and the offices of the Susquehanna Planning Commission at the addresses listed below in Section F.

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

The Bendix Superfund Site is an active aircraft instrument manufacturing plant. From 1952 to 1978, solvents used in degreasing operations were disposed into the onsite wastewater treatment system, into a series of earthen trenches and onto the ground surrounding the plant. The disposal practices resulted in contamination of the soil and groundwater, with chemicals including trichloroethylene ("TCE"), perchloroethylene ("PCE"), 1,1,1-trichloroethylene ("TCA"), vinyl chloride, benzene, and xylene (hereinafter collectively referred to as "VOCs"). The contaminants are "hazardous substances" as defined in Section 101(14) of CERCLA.

For a more detailed summary of site history, and contamination problems, see Sections III (page 1) and V (page 2) of the ROD. For a description of the remedy as set forth in the ROD, see Section XII (page 24).

C. Significant Differences; Rationale

Selected Remedy for the Contaminated Soil Areas.

There are two major areas of VOC contaminated soils at the Site; the area to the east of the Bendix plant, and the area to the west of the plant. The selected remedial

alternative for the soils on the east side of the plant was excavation and mechanical aeration, and for the soils on the west side of the plant the selected remedy was vacuum extraction. One of the main reasons vacuum extraction was selected for the west side of the plant was because there were numerous buried utilities in this area making soils excavation and aeration (as selected for the east side) both hazardous and environmentally inefficient. In 1991 a vacuum extraction and soil dewatering pilot study was performed to assess the effectiveness of this technology and to gather information for designing the site remedies. This study and other remedial work at the Site found vacuum extraction to be technically and physically impractical due to the nature of the soils in this area (glacial till). Furthermore, the impediments to excavation and soil aeration, i.e. the buried utility lines, were removed by relocating them overhead.

Therefore, the responsible party requested that the remedy be changed to provide for soil excavation and aeration on the west side of the plant instead of vacuum extraction. EPA has decided that it is appropriate to make this change. This ESD modifies the Record of Decision; however, the attainment levels and levels of protection remain unchanged.

In summary, this ESD allows for the same remedial action (i.e. mechanical soils aeration) to occur for soils on the west side of the plant as was specified in the Record of Decision for the east side of the plant.

D. Affirmation of Statutory Determinations

Considering the new information that has been developed and the changes that have been made to the selected remedy, EPA believes that the remedy, as modified by this ESD, 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.

E. Support Agency Comments

The above changes to the remedy have been coordinated with representatives of PADEP pursuant to 40 C.F.R. § 300.435(c)(2)(i). PADEP verbally concurred on November 13, 1995 with changes to the selected remedy as described in this ESD.

F. Public Participation Activities

As required by 40 C.F.R. § 300.435(c)(2)(i), notice of this ESD will be published in the local newspaper. This ESD is part of the administrative record file and is available for review at the two locations identified below:

United States Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107
(215) 597-3037
Hours: 8:30 a.m. to 5:00 p.m.
Monday through Friday

Susquehanna County Planning Commission
31 Public Avenue
Montrose, PA 18801
(717) 278-4600
Hours: 8:00 a.m. to 5:00 p.m.
Monday through Friday

(1/96)
Date CFC

Thomas C. Voltaggio, Director
Hazardous Waste Management Division

Note: EPA CANNOT LOCATE A "SIGNED"
COPY OF THE ESD. BASED ON INTERNAL
INFORMATION & THE ATTACHED NEWSPAPER
NOTICE, I THINK THE ESD WENT INTO
EFFECT IN 1/96.

The above hand-written note was typed for legibility.

Note: EPA can not locate a "signed" copy of the ESD.
Based on internal information and the attached newspaper
notice, I think the ESD went into effect in 1/96.

sylvania Council of Churches will be guest speaker during the annual Week of Prayer for Christian Unity service in St. Peter's Cathedral.

The service, themed "Listen! I Stand at the Door and Knock," is scheduled Thursday, beginning

ceeded \$2 million.

Thursday's service also will include music performed by choristers from numerous local congregations. The service choir will be directed by Stephen Barton, the cathedral's director of liturgical music.



U.S. EPA TO ALTER METHOD FOR CLEANING UP CONTAMINATED SOILS AT THE BENDIX FLIGHT SYSTEM SUPERFUND SITE

The U.S. Environmental Protection Agency, Region III, will change one aspect of its cleanup remedy for the Bendix Flight System Superfund site in South Montrose, Susquehanna County, PA. The change will modify the way contaminated soils will be cleaned up in an area west of the plant. The Bendix Superfund site is an active facility where aircraft instrumentation is manufactured.

In September 1988, the EPA selected a cleanup remedy to deal with two areas of soils at the site which were contaminated with chemicals including tetrachloroethylene (TCE), perchloroethylene (PCE), vinyl chloride and other volatile organic compounds. EPA's remedy called for a vacuum extraction method to remove contaminants from soils west of the plant. For an area east of the plant, EPA required the excavation of soils followed by mechanical aeration to remove contaminants.

Now, based on a pilot study which began in 1991, EPA's remedy has been changed to allow use of the excavation and mechanical aeration method for soils west of the plant. Allied-Signal Inc., the party liable for contamination at the site, performed the pilot study to determine the effectiveness of the vacuum extraction technology. The study concluded that the method does not work well in the west area. Therefore, Allied requested that EPA change the remedy. EPA has decided that the change is appropriate and more importantly, it remains protective of human health and the environment. In addition, the change does not fundamentally alter the 1988 remedy with respect to scope, performance or cost.

This change to the remedy is described in a document called "Explanation of Significant Difference" (ESD). Anyone interested in reviewing the ESD and other documents pertaining to the cleanup of this site can visit the following locations:

U.S. ENVIRONMENTAL PROTECTION AGENCY
841 CHESTNUT STREET
PHILADELPHIA, PA 19107
(215) 597-3037
HOURS: M-F/8:30-5:00

SUSQUEHANNA COUNTY
PLANNING COMMISSION
31 PUBLIC AVENUE
MONTROSE, PA 18801
(717) 278-4600
HOURS: M-F/8:00-5:00

FOR MORE INFORMATION ABOUT THE BENDIX FLIGHT SYSTEMS SUPERFUND SITE, CALL: TERRI WHITE, EPA COMMUNITY INVOLVEMENT COORDINATOR, (800) 553-2509.