



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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APR 24 1985

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Additional Guidance on Delegation of Selection of
Remedy Authority to Regions

FROM: *Jack W. McGraw*
Jack W. McGraw
Acting Assistant Administrator

TO: Regional Administrator
Regions I - X

On March 3, 1985, the Administrator signed the Superfund delegation authority which allows Regional Administrators to sign Records of Decision (RODs) and Enforcement Decision Documents (EDDs) for several specific kinds of remedies. The delegation guidance dated January 16, 1985, described the criteria to be used in selecting the types of remedies that would be delegated to the Regions. The major Regional comments on this guidance concerned the extent of delegation and the requirement for submission of documents to support the delegation requests.

The delegation criteria should only be viewed as a general guide and, in order to meet our target of 60 percent delegations, we will be delegating a large number of RODs/EDDs that have significant issues. To understand these issues and assist with their resolution, a minimal amount of information needs to be submitted in the delegation analysis summary. The attached delegation summary for the Whitehouse, Florida, site should be used as a guide.

In order to increase delegation to the Regions in FY 86, additional guidance will be prepared and only remedies that involve complex area-wide contamination, permanent relocation, betterment, public welfare, fund balancing or nationally significant enforcement cases will be retained by the AA-OSWER. We anticipate that 90 percent of the remedies will be delegated in FY 86.

I believe the delegation process is running smoothly and request that your staffs continue to work closely with the Office of Emergency and Remedial Response and Office of Waste Programs Enforcement staffs. If you have any specific questions please contact Bill Hanson for remedial (FTS) 382-2345 and Bob Mason for enforcement (FTS) 475-8235.

Attachment

Delegation Analysis Summary
Whitehouse Oil Pits
Whitehouse, Fl.
Program lead/State

I. Delegation Criteria:

General remedial measures in which off-site contamination is limited.

II. Site Description:

See site plan (attached)

- 10 miles west of Jacksonville, Fla. (rural area).
- 7 acre site
- Former oil reclamation process, fish kills and oil spills documented in past.
- Shallow, intermediate, and limestone aquifers within 150 feet of surface, limestone aquifer is separated by 70 foot aquiclude and is used as drinking water source in area. Floridian aquifer (Class I) approximately 600 feet below surface.

a. Previous response activity:

- Pits were drained, fluids were treated, and sludge stabilized.
- Sludge was re-deposited in original seven pits, covered with trash and soil.
- Dike stabilization work.

b. Current Site Status - Hazardous Compounds Present:

- 83,000 cubic yards of contaminated (metals, organics) sludges, soils, and waste in 7 pits. Average depth of contamination is 15 feet, with top 5 feet being fill material
- PCB contamination (minimal) in small, off-site stream area.
- 20 million gallons of contaminated ground water (metals, organics) in shallow and intermediate aquifers.
- Contaminated surface water and leachate collects on-site.

c. Risk to Receptors via Pathways:

- Direct contact threat from soils, sludges, waste leachate, and sediments.
- Local drinking water supply (limestone aquifer) threatened by contaminants from shallow and intermediate aquifers migrating vertically through aquitard.
- Water quality in adjacent stream effected by contaminants in groundwater migrating laterally.

d. Status of Current RI or FS:

- RI completed 12/84
- FS to be completed by 04/84

III. Remedial Objectives/Criteria/Alternatives

a. Operable units:

ROD will be final action, no operable units planned.

b. Remedial objectives and criteria:

- Prevent direct contact threat from soils, sludges, waste, leachate, and sediments.
- Prevent further contamination of shallow and intermediate aquifers and prevent migration of this contaminated ground water to limestone aquifer.
- Prevent further contamination of stream.

c. Remedial alternatives:

- See decision summary table (attached)

IV. Other

a. Enforcement

- There is limited possibility of recovering remedial activity cost.

b. Public comments

- Public comments period to be held in future.
- Rumors of relocation.

c. Schedule

- | | |
|--------------------------------------|----------|
| - Final Draft FS | 03/04/85 |
| - Beginning of public comment period | 03/04/85 |
| - ROD presentation to RA | 06/15/85 |

d. Future actions

- O&M requirements if on-site landfill selected.
- O&M requirements if ground water treatment system selected.

V. Issues:

1. State of Florida has promulgated regulation that will not permit a new hazardous waste landfill to be permitted, however, on-site disposal would be more cost effective than off-site disposal as per CERCLA 101(24). Headquarters recommends that the decision for an on-site disposal unit be based on technical factors only.

Whitehouse, Fl. Decision Summary Table

<u>Alternative</u>	<u>Cost</u>	<u>Public Health Considerations</u>	<u>Environmental Consideration</u>	<u>Technical Considerations</u>	<u>Other</u>
A) • No Aciton	0	Direct contact Contamination of drinking water	Direct contact Off-site migration of contaminated ground water		
B) • CAP/Slurry Wall GW trt.	2M	Potential for drinking water contamination		Slurry wall may not be compatable with waste	
C) • Remove sludges, soil, waste • Stabilization • On-site landfill • GW trt	12M	Inert waste placed in landfill Landfill overlies class I aquifer		Waste may not be suitable for stabilization	State has promulgated regulation against new landfill Possible public opposition
D) • Remove sludges, soil, waste • Stabilization • Off-site disposal • GW trt	60M	Inert waste placed in landfill		Waste may not be suitable Double lined facility may be great distance	
E) • Remove sludges, soil, waste • On-site incineration • On-site landfill • GW trt	86M	Waste destroyed	Waste destroyed	Incinerator must be mobile or designed	Possible public opposition
F) • Remove sludges, soil, waste • Off-site incineration • Off-site landfill • GW trt	67M	Waste destroyed	Waste destroyed	Facility may be great distance Commercial Capacity may be limited	

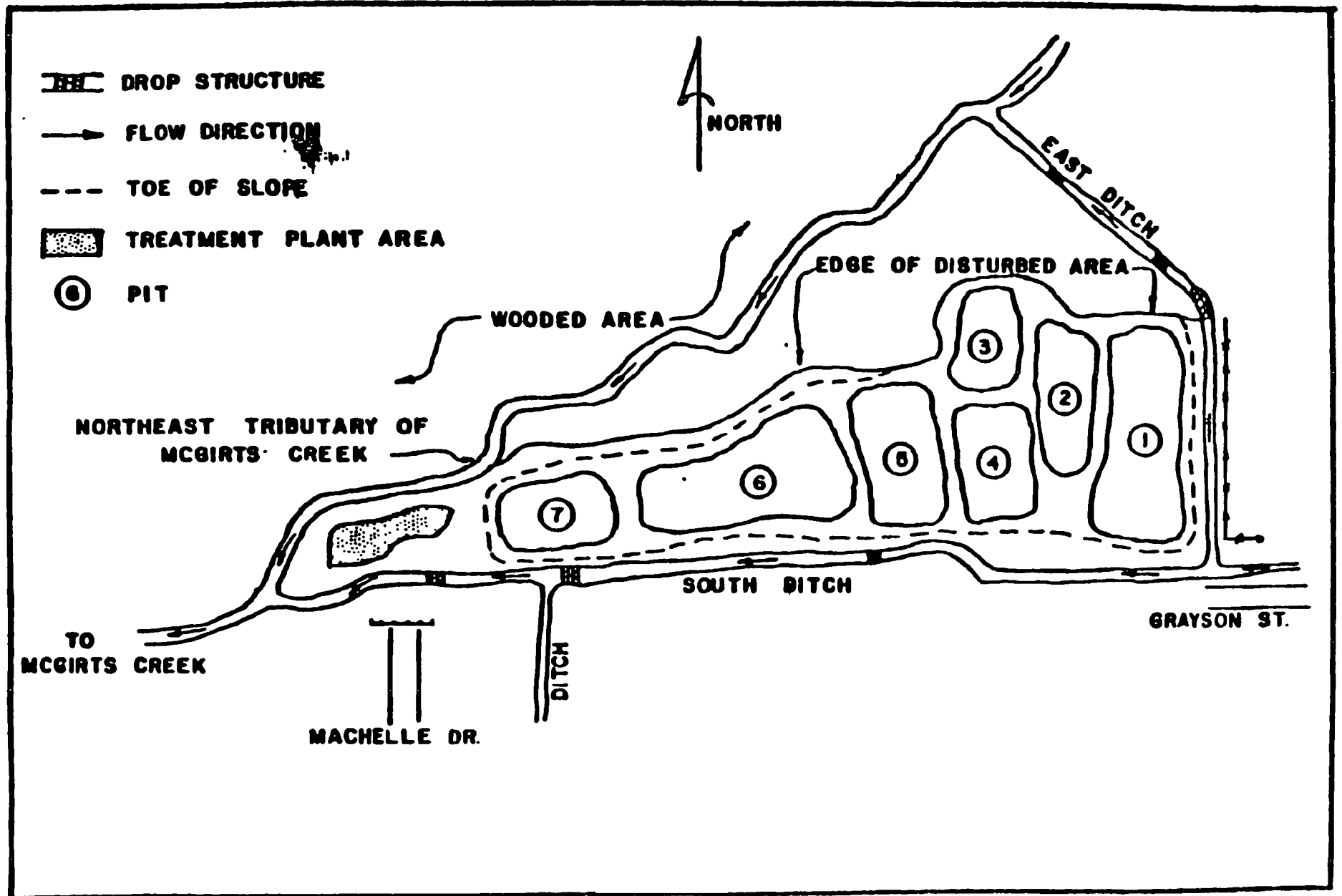


FIGURE I-1: OVERALL SITE SKETCH

ADOPTED FROM: FINAL DRAFT REMEDIAL
ACTION MASTER PLAN
ECOLOGY & ENVIRONMENT, INC.