MEMORANDUM

SUBJECT: Explanation of Significant Differences
Harris Corporation/Palm Bay Facility Site
Palm Bay, Brevard County, Florida

FROM: Barbara S. Dick
South Florida Remedial Section
South Superfund Remedial Branch

THRU: Jim McGuire, Chief
South Florida Remedial Section
South Superfund Remedial Branch

Doug Mundrick, Chief
South Superfund Remedial Branch

TO: Richard D. Green, Associate Director
Superfund and Emergency Response

This memorandum serves to present the Explanation of Significant Differences (ESD) for the Harris Corporation/Palm Bay Facility site for your concurrence. This ESD modifies the requirements for three of the seven groundwater contaminants listed in Section 9.0(A.3), Performance Standards, of the OU2 Record of Decision (ROD), signed on February 15, 1995. This section of the ROD listed Treatment Standards for the contaminants at the site and required that the seven contaminants be treated via the air stripper until they attain their cleanup levels.

The major differences between the original remedy in the ROD and the modified remedy outlined in this ESD are as follows:

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<th>Original Remedy</th>
<th>Modified Remedy</th>
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<td>• Groundwater treatment and monitoring of seven contaminants until cleanup levels are attained</td>
<td>• Groundwater treatment and monitoring of four contaminants until cleanup levels are attained</td>
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<td>• Groundwater monitoring of one contaminant until the cleanup level is attained</td>
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December 5, 1995
Two contaminants that the OU2 ROD requires to be treated via the air stripper, manganese and bis(2-ethylhexyl)phthalate, are not VOCs. Therefore, these contaminants are not directly treated by the existing groundwater treatment system. The cleanup level for manganese (50 parts per billion (ppb)) stated in the ROD is the State of Florida's secondary Maximum Contaminant Level (MCL). Since the ROD, Florida Department of Environmental Protection (FDEP) has met with Harris' technical staff and has had discussions with Harris and EPA on the manganese requirements. Only one well, Recovery Well SC-2S, has contained concentrations of manganese above cleanup levels. FDEP has determined that given the frequency of detection and the concentrations of manganese detected (166 ppb), significant groundwater problems from manganese at the Harris site would not be expected.

Therefore FDEP, in consultation with EPA, has determined it is not necessary to treat the groundwater for manganese. However, groundwater monitoring for manganese will continue from Recovery Well SC-2S until the State secondary MCL is achieved.

The second contaminant that this ESD concerns is bis(2-ethylhexyl)phthalate. This chemical was identified as a contaminant of concern based on one groundwater sample collected before the ROD which contained 7 ppb bis(2-ethylhexyl)phthalate. The Federal MCL and cleanup level for this contaminant is 6 ppb. Since the ROD, Harris has collected additional groundwater samples, with partial oversight by the State, and provided the results to EPA and the State. The concentration of bis(2-ethylhexyl)phthalate was below the cleanup level in the same area where previously it was above the cleanup level.

Because of the absence of the bis(2-ethylhexyl)phthalate in the recent groundwater samples, the low frequency of detection during the earlier sampling, the low concentration detected, and the absence of any identified source area, EPA and the State believe that bis(2-ethylhexyl)phthalate is not a site-related contaminant of concern. Therefore, no further groundwater treatment and monitoring for bis(2-ethylhexyl)phthalate is required.

The third contaminant which this ESD concerns, benzene, was a contaminant of concern in the ROD based on a few exceedances of the State MCL (1 ppb). Since the ROD, Harris has sampled the groundwater for benzene and evaluated all the data on benzene. The results were reviewed by FDEP and EPA. The resampling results from all the wells which had exceeded the State MCL since 1990, showed concentrations of benzene that were now below the cleanup level.

The analysis determined there is no technical justification for including benzene in the ROD. The review showed that the few random benzene samples slightly exceeding the cleanup level could be attributed to acceptable statistical deviations and analytical
accuracy variations. Benzene was present in less than 1% of the 611 samples collected from the 70 groundwater monitoring wells on the Semiconductor Sector portion of the site.

Because of the statistical insignificance, the low concentrations and the recent sampling results, FDEP and the State have determined that benzene is not a constituent of concern and monitoring is not necessary. However, the existing air stripper treats for VOCs and benzene is a VOC. Therefore even in the unlikely event of the presence of significant concentrations of benzene in the groundwater, the treatment system will treat this contaminant.

All other aspects of the selected remedy in the ROD remain unchanged at the time of issuance of this ESD. I recommend that you concur with this ESD so that it may be added to the Administrative Record. EPA has received written concurrence on the modifications to two of the three contaminants addressed in this memorandum and verbal concurrence on the third.

Attached is a copy of the fact sheet which will be added to the Administrative Record. This fact sheet explains the changes to the remedy and the Agency’s rationale for the change. A public notice briefly describing the ESD will be published in the Florida Today newspaper to notify the public of the availability of the ESD in the local Information Repository.

Attachment