

# EXPLANATION OF SIGNIFICANT DIFFERENCES



## STAUFFER CHEMICAL COMPANY SUPERFUND SITE TAMPA, HILLSBOROUGH COUNTY, FLORIDA

Region 4

November 1997

### Introduction

This Explanation of Significant Differences (ESD) for the Stauffer Chemical Company Superfund Site in Tampa, Hillsborough County, Florida, has been prepared by the Region 4 Office of the United States Environmental Protection Agency (EPA). The purpose of this ESD is to designate the Site as a Corrective Action Management Unit (CAMU) to document that soil treated by Low Temperature Thermal Desorption (LTTD) during the 1994 removal action or by bioremediation in current actions can be placed back onsite after cleanup levels are met. Placement of these soils onsite does not violate the Land Disposal Restrictions (LDRs) of the Resource Conservation and Recovery Act (RCRA) because of the CAMU designation.

This ESD is being issued as part of public participation responsibilities under Section 117(c) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended by Superfund Amendments and Reauthorization Act (SARA), and Section 300.435(c)(2)(I) of the

National Contingency Plan (NCP), 40 CFR Part 300.

The Administrative Record contains documents used as the basis for remedy selection at the site, including the ROD and Responsiveness Summary. This ESD will become part of the Administrative Record in accordance with Section 300.825(a)(2) of the National Contingency Plan. The Administrative Record documents are available for public review and copying in the Stauffer Chemical Company Site information repository located at the following address:

University of South Florida  
Tampa Campus Library  
4202 East Fowler Avenue  
Tampa, FL 33620-5400  
(813) 974-2729

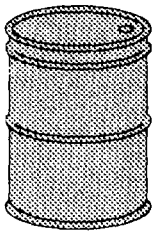
As part of its public participation responsibilities, EPA is providing a thirty-day comment period, beginning November 19, 1997 and ending December 18, 1997, for the public to comment on this ESD. Send written comments prior to the close of the

comment period or direct questions to:

Pamela Scully or Brad Jackson  
South Superfund Remedial Branch  
U.S. Environmental Protection Agency  
61 Forsyth St., S.W.  
Atlanta, Georgia 30303  
1-800-435-9234  
(Ext. 2-8935 or 2-8925)

### **Site Background**

The Site is located at 2009 Orient Road in Hillsborough County, Tampa, Florida. The Site is an inactive pesticide manufacturer/distribution facility which encompasses approximately 40 acres of land in an industrialized area of Tampa.



The Site was used to formulate agricultural chemical products from 1951 until 1986 and is now inactive. Agricultural pesticides, such as herbicides and insecticides were combined at the plant with raw materials such as kerosene, xylene, clay, solvents, and diatomaceous earth to form pesticide dusts, granules, and liquids that were packaged for distribution. A small incinerator located at the Site was used to burn packaging materials that formerly contained raw materials.

Between 1953 and 1973, waste materials from the facility were disposed of onsite. Several site investigations by various organizations were conducted at the Site between 1987 and 1992. In March 1992, EPA formally requested that Stauffer Management Company perform a removal

action at the Site. Removal activities were divided into two phases. Phase I included the removal of buried metal and drums, and onsite soils containing a total pesticide concentration of 1,000 ppm or greater from seven separate areas onsite. Phase II included the treatment, transportation, and or disposal of all hazardous substances excavated in Phase I.

A total of 3,415 cubic yards (CY) of soil was removed from seven different areas and treated onsite. Of the 3,415 CY excavated, approximately 3,265 CY of contaminated soils were treated using Low Temperature Thermal Desorption (LTTD) technology and placed in a vacant warehouse at the Site. The remaining 150 CY were set aside for use in treatability studies. Seventeen rolloff boxes, equivalent to 510 CY of debris, which includes crushed drums, wood, and other miscellaneous metal, were also removed from the areas onsite; the rolloff boxes (six profiled as hazardous and ten profiled as non-hazardous) were shipped offsite to an approved facility. The excavated areas onsite were backfilled with clean soil.

In September 1992, Stauffer agreed to conduct a remedial investigation and feasibility study (RI/FS) of remaining soil, sediment, and surface water contamination at the Site. In October, Stauffer agreed to include the investigation of ground water contamination. Based on the results of the RI/FS, pesticide contamination was found in all media investigated onsite. No site-related contamination was found offsite in the Tampa Bypass Canal.

## **Selected Remedy**

On December 1, 1995, EPA signed a Record of Decision (ROD) for the Site. The ROD describes the contamination at the Site and the approved cleanup method to be used at the Site. The selected remedy involves excavation, consolidation, and bio-remediation of contamination in soils and sediments to industrial cleanup standards. To ensure that industrial uses are maintained, legal controls will be implemented. The selected remedy also requires shallow ground water recovery, treatment, and discharge, as well as, monitoring of ground water quality in the Floridan aquifer.

## **Explanation of Significant Differences**

This document serves to clarify two issues that were not fully described in the ROD. First, in the Record of Decision the site was referred to as the Stauffer Management Company Site; although Stauffer Management Company is the Potentially Responsible Party (PRP) at the Site, the official name of the Site at the time of listing was the Stauffer Chemical Company Site. References to the Stauffer Management Company Site should be considered equivalent to Stauffer Chemical Company for the purposes of the ROD.

Second, the ROD did not discuss placement of soil treated by LTDD or bioremediation back on the site. The ROD should have stated:

1. The whole site is considered one Corrective Action Management Unit

(CAMU) for the purpose of managing remediation waste.

2. On-site soils and sediments treated by LTDD or bioremediation are considered remediation waste.
3. Excavation, treatment and placement of remediation waste in a CAMU is not a "disposal" event which triggers LDRs or other hazardous waste land disposal requirements.

## **Support Agency Comments**

The State of Florida Department of Environmental Protection has indicated agreement with this designation, although written concurrence has not been received..

## **Affirmation of the Statutory Determination**

EPA believes designation of the Site as a CAMU and subsequent placement of treated soils back on the Site will be protective of human health and the environment, will comply with Federal and State requirements that are applicable or relevant and appropriate to this remedial action, and will be cost effective. In addition, the remedy uses permanent solutions to the maximum extent practicable for this Site.

## **Technical Assistance Grants**

To assist communities in interpreting the technical findings at Superfund sites, communities may apply for Technical Assistance Grants of up to \$50,000. Congress and EPA have established

requirements for the use of this grant. Citizens who are interested in a TAG may contact Ms. Rhonda Newberry at (800) 435-9234, Ext. 2-8867.

### **Contacts**

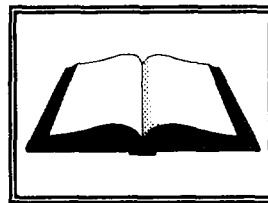
If you have questions about the information provided in this ESD or concerns about activities taking place on the Site, please contact Brad Jackson at (800) 435-9234.

### **Comments**

The U.S. Environmental Protection Agency is interested in your comments regarding the information you have just received and your opinion about ways we can serve you better while performing our duties. Please call the persons listed above with any comments you may have.

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## **GLOSSARY**



**Administrative Record:** File containing all information used by the agency to make its decision on the selection of a response action at a Superfund site. A copy of the administrative record is placed in the information repository near the site.

**Applicable or Relevant and Appropriate Requirements (ARARs):** Refers to Federal and State requirements a selected remedy must attain which vary from site to site.

**Corrective Action Management Unit (CAMU):** an area on site that is designated by the Regional Administrator for the purpose of implementing remedial action requirements. A CAMU shall only be used for the management of remediation waste during remedial action at the site.

**Explanation of Significant Differences (ESD):** document which explains why action taken was different than the final remedial action plan approved in the ROD.

**Feasibility Study (FS):** A study to identify and screen cleanup alternatives and analyze in detail the technology and costs of the alternatives.

**Information Repository:** File containing current information, technical reports, and reference documents regarding the Super-fund program and the site.

**Land Disposal Restrictions (LDRs):** Restrictions on land disposal of hazardous waste enacted by Congress in the Hazardous and Solid Waste Amendments to the Resource Conservation and Recovery Act.

**Low Temperature Thermal Desorption (LTTD):** A treatment system which uses heat to vaporize and destroy contamination.

**Part Per Billion (ppb):** Unit to express low concentrations of contaminants. For example, one ounce of xylene in one billion ounces of water is 1 ppb.

**Record of Decision (ROD):** A public document that explains the remedy selected to cleanup a Superfund site. The ROD is based on information and technical analysis generated during the RI/FS and on consideration of public and state comments and community concerns.

**Remedial Investigation (RI):** A study to collect necessary data to determine the type and extent of contamination at NPL sites.

**Treatability Study:** A study done to determine if the proposed treatment will effectively reduce contamination in the contaminated media (soil, ground water, etc.) at the site.