

**EPA Superfund**  
**Record of Decision:**

**FEDERAL AVIATION ADMINISTRATION TECHNICAL  
CENTER (USDOT)**  
**EPA ID: NJ9690510020**  
**OU 10**  
**ATLANTIC COUNTY, NJ**  
**02/13/1997**

<IMG SRC 970090>

RECORD OF DECISION

AREA P  
BUILDING 204  
FUEL SPILL AREA

FAA WILLIAM J. HUGHES TECHNICAL CENTER  
ATLANTIC CITY INTERNATIONAL AIRPORT  
NEW JERSEY

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DECLARATION FOR THE RECORD OF DECISION

Area P - Building 204 Fuel Spill Area  
FAA William J. Hughes Technical Center

FACILITY NAME AND LOCATION

Federal Aviation Administration (FAA) William J. Hughes Technical Center, Atlantic County  
Atlantic City International Airport, New Jersey

STATEMENT OF BASIS AND PURPOSE

This decision document presents the selected remedial action for Area P, the Building 204 Fuel Spill Area at the FAA William J. Hughes Technical Center, Atlantic City International Airport, New Jersey. The remedial action decision was chosen in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), and, to the extent practicable, the National Contingency Plan (NCP). This decision is based on the administrative record for Area P.

The Commissioner of the New Jersey Department of Environmental Protection and the Pinelands Commission concur with the selected remedy (Appendix A).

DESCRIPTION OF THE SELECTED REMEDY AND CONTINGENCY REMEDY

The selected remedy for Area P is no further action.

DECLARATION OF STATUTORY DETERMINATIONS

The Federal Aviation Administration and the U.S. Environmental Protection Agency (EPA), Region 2 have determined that no remedial actions are necessary at Area P to ensure protection of human health and the environment. Pursuant to Section 121(c) of CERCLA, 42 U.S.C. 9621(c) and Section 300.430(f)(4)(ii) of the National Contingency Plan, 40 C.F.R. Section 300.430(f)(4)(ii), the site is not limited with respect to future use or access and, therefore, a five-year review of the selected remedial action is not required.

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DECISION SUMMARY

## RECORD OF DECISION

Area P - Building 204 Fuel Spill Area  
FAA William J. Hughes Technical Center

### I. SITE NAME, LOCATION AND DESCRIPTION

The FAA William J. Hughes Technical Center (FAA Technical Center) encompasses an area of approximately 5,000 acres in Atlantic County, New Jersey, eight miles northwest of Atlantic City. Among the installations on the property are the Atlantic City International Air Terminal, the New Jersey Air National Guard 177th Fighter Interceptor Group, the Upper Atlantic City Reservoir, the Laurel Memorial Park Cemetery and the extensive facilities of the FAA Technical Center. Atlantic City's 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 traverse portions of the FAA Technical Center grounds. The Public water supply facilities on site are owned by the Atlantic City Municipal Utilities Authority (ACMUA).

The FAA Technical Center is located within the Atlantic Coastal Plain, a broad, flat plain which encompasses the southern three-fifths of New Jersey. The area within two miles of the FAA Technical Center has a maximum relief of about 65 feet, ranging from an elevation of 10 feet above mean sea level (msl) at the Lower Atlantic City Reservoir to 75 feet above msl to the west and north of the airport. The facility itself is relatively flat; slopes generally range from 0 to 3 percent. Forested areas exist north, south and east of the airport runways. These areas comprise about 40% of the 5,000-acre FAA Technical Center property. The remaining 60% of the site has been cleared for FAA facilities and consists of buildings and paved surfaces, grassed lawns and native grasslands and shrubs adjacent to the runways.

The area within one mile of the FAA Technical Center boundaries includes open or forested land and commercial and residential areas. A large forested tract containing no commercial or residential property exists west of the FAA Technical Center. To the east, the property is bordered by the Garden State Parkway, the Lower Atlantic City Reservoir, and the forested land surrounding the reservoir. The area north of the FAA Technical Center contains commercial properties along the White Horse Pike (Rte. 30) and a concentrated residential area, Pomona Oaks, north of the White Horse Pike. The closest residential area south of the FAA Technical Center is a series of three trailer parks at the intersection of Tilton Road and Delilah Road. The majority of commercial and residential areas south of the FAA Technical Center are greater than 2,000 feet away from the FAA property, south of the Atlantic City Expressway. All residential areas in the vicinity of FAA appear to be upgradient or otherwise isolated from the ground water flow at the FAA Technical Center.

Area P is located at Building 204 in the Research and Development (R&D) area of the FAA Technical Center, south of the Upper Atlantic City Reservoir, as indicated in Figure 1. The building is used to conduct velocity experiments on various aircraft components. A small, unnamed stream is located east of Area P and drains into the Upper Atlantic City Reservoir, as indicated in Figure 2. Card Road borders the site to the north.

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### II. SITE HISTORY AND ENFORCEMENT ACTIVITIES

#### A. Land Use

The first significant development of what is now FAA property came during the 1930s when the Upper Atlantic City Reservoir was created by damming the South Branch of Doughty's Mill Stream. Prior to 1942, the entire property was wooded, except for the presence of large borrow pits near the present-day R&D facilities. On a 1940 aerial photograph, several dirt roads and what appears to be a railroad right-of-way traverse the property. In the early 1940s, a Naval Air Base and the Atlantic City Municipal Airport, including most of the existing runways, were constructed over much of the eastern two-thirds of the property. Many of the

buildings in the western built-up area were also constructed at this time. In 1958, the Navy transferred its interests to the Airways Modernization Board (AMB).

The FAA took over the operations of the AMB in November 1958. The development of most of the R&D portion of the facility south of the Upper Atlantic City Reservoir occurred in the early 1960s. The FAA's large Technical/Administrative Building was constructed in 1979. The New Jersey Air National Guard has maintained its facilities south of the runways in the west-central portion of the facility since 1973.

In May 1987, during the excavation of a footing for an addition to Building 204, construction contractors encountered a significant quantity of fuel in the soils southeast of the building at a depth of three to four feet. The source of this fuel was determined to be a leak in a valve pit near the southeast corner of Building 204. The valve pit was associated with piping which passed from two 10,000-gallon underground JP-4 jet fuel storage tanks to Building 204. The locations of the footing excavation, valve pit area and underground storage tanks in relation to Building 204 are provided in Figure 2. The two underground jet fuel storage tanks were removed on October 28 and November 7, 1991, as part of the FAA's ongoing underground storage tank management program.

The FAA Technical Center was listed on the National Priorities List (NPL) on August 30, 1990, 55 FR 35502, with an effective date of October 1, 1990. The FAA entered into an Interagency Agreement (IAG) with the U.S. Environmental Protection Agency (EPA) on May 17, 1993. The IAG is a legally enforceable document that memorializes FAA's commitment to remediate the site and defines the role of EPA in the cleanup process.

#### B. Initial Investigations

In 1983, the New Jersey Department of Environmental Protection (NJDEP) directed Roy F. Weston (Weston) to conduct an assessment of potential pollution sources that could impact the then-proposed Atlantic City well field. The assessment included a review of all data on possible contaminant sources in the area, limited field investigation of these sources, and soil and ground water sampling at five areas considered most threatening to ground water supplies in the area. The entire FAA Technical Center was included in the Weston Study, and the five areas identified by Weston were all located on the FAA property. Weston's report led the FAA to initiate the present Environmental Investigation/Feasibility Study (EI/FS) of the five sites as well as additional areas, including Area P, identified by the FAA.

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#### C. Environmental Investigation

The FAA initiated the EI study of Area P immediately after the identification of the fuel spill. The EI included four separate phases of investigation conducted between May 1987 and November 1994. The scope of these investigations is described below.

##### Phase I

The Phase I EI included soil gas sampling, subsurface soil sampling, and ground water sampling, which were conducted in May and June of 1987. A surface water sample and sediment sample were also collected from the small stream east of Area P in April 1987 as part of a facility-wide surface water and sediment quality investigation conducted during the Phase I EI. Each of these Phase I EI components is discussed briefly below. Figures 3, 4 and 5 provide the Phase I EI sampling locations.

! A soil gas survey was conducted within the footing trench area to identify the direction of contamination movement through the presence of elevated levels of volatile organic compounds (VOCs) within the soil's pore space. The results of the survey indicated that the contamination associated with the fuel spill was migrating to the northeast, in the direction of the area where the adjacent small stream discharges into the Upper Atlantic City Reservoir.

! Six subsurface soil samples (P-1 through P-6) were collected at Area P, with five of the samples collected from the footing trench based on the results of the soil gas survey and the sixth sample

collected approximately 50 feet north-northeast of the footing trench. All of the samples were collected at a depth of 3.0 to 3.5 feet, just above the water table, and analyzed for total petroleum hydrocarbons (TPH). Each of the samples exhibited the presence of TPH compounds.

- ! Twelve soil borings (B-1 through B-12) were drilled to a depth at least two feet below the water table, and headspace readings were measured for each two-foot split-spoon sample to define the lateral extent of contamination. No subsurface soil samples were collected from the soil borings. Elevated organic vapor levels were detected over an area extending approximately 150 feet to the northeast of the valve pit area.
- ! Three shallow monitoring wells (P-MW1S, P-MW2S and P-MW3S) were also installed between the fuel spill area and the Upper Atlantic City Reservoir during the Phase I EI. All ground water samples were submitted for priority pollutant VOC, total xylene and TPH analyses. The analytical results indicated that the downgradient impacts to ground water quality were minimal, with TPH and methylene chloride being the only consistently detected contaminants. Benzene, ethylbenzene and total xylenes were also detected in the monitoring well (P-MW3S) located closest to the fuel spill area.
- ! One surface water sample (SW-4) and one sediment sample (SD-4) were collected during the Phase I EI from the small unnamed stream which enters the Upper Atlantic City Reservoir just to the northeast of Area P. Both of these samples were analyzed for priority pollutants plus 40 additional compounds (PP+40). Analysis of the surface water sample revealed the presence of the pesticide 4,4-DDT, semi-volatile organic compound (SVOC) tentatively identified compounds (TICs) and zinc. The sediments sample collected at the same location as the surface water sample exhibited methylene chloride, VOC TICs, SVOC TICs, chromium and lead.
- ! The Area P boring logs and slug tests in combination with geophysical surveys and pump tests performed at Area 27, located to the west and northwest of Area P, provide geologic and hydrogeologic information on the area. Most of the Area P borings were located in and around a landscaped berm located to the northeast of the spill area. The fill comprising the berm consists primarily of fine sand, with medium to coarse sands with some gravel underlying the fill material. The medium to coarse sands extend to a depth of about 14 feet near the reservoir but extend to a depth of about 20 feet closer to the spill area. These sands are underlain by fine sand with some silt. About 300 feet to the northwest of Area P, tight silty clay was encountered from a depth of 37 to 52 feet at an Area 27 well location. It is likely that this layer, which comprises the Upper Cohansey Clay, is present at similar depths at Area P. The water table at Area P was encountered at depths of 3 feet to 7 feet during the Phase I EI. Ground water flow at the site is northeast, in the direction of the confluence of the unnamed stream and the Upper Atlantic City Reservoir.

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#### Interim Removal Actions

To allow the construction of the Building 204 addition to proceed, interim contaminated soil and ground water removal activities were conducted at Area P. The removal activities consisted of the excavation of 278 cubic yards of soil in the footing trench area to a depth of two feet below the water table (5 to 7 foot total depth). Based on chemical analyses of the excavated soils, approximately 180 cubic yards of soil were classified as non-hazardous and disposed of at the Pinelands Park industrial waste landfill in Egg Harbor Township, New Jersey, while approximately 98 cubic yards of soil were classified as hazardous by NJDEP (based on a TPH level of greater than three percent, considered by NJDEP to represent saturation) and transported to Waste Conversion in Hatfield, Pennsylvania for subsequent landfill disposal as a hazardous waste. Ground water which collected within the excavation area during this period was removed, with approximately 5,000 gallon transported off-site for treatment at the DuPont wastewater treatment facility in Deepwater, New Jersey.

#### Phase II

The Phase II EI was conducted at Area P in 1988 to characterize any changes in contaminant concentrations subsequent to the Phase I ground water sampling effort. Phase II activities included the installation of a replacement well (P-MW4S) to take the place of monitoring wells P-MW3S, which was damaged during the construction activities at Area P, and the installation of an additional monitoring well (P-MW5S). Due to the presence of newly installed underground utilities in the vicinity of the original P-MW3S well location, P-MW4S was located approximately 25 feet southeast of the original location. The other new monitoring well, P-MW5S, was located northeast of Area P, approximately 45 feet west of the small stream which flows into the Upper Atlantic City Reservoir. Monitoring well locations are indicated in Figure 4. Phase II ground water samples were analyzed for priority pollutant VOCs, total xylenes, and TPH. Benzene and ethylbenzene were identified in the sample collected from monitoring well P-MW2S, but at concentrations which were below the analytical detection limits. Well P-MW2S also exhibited VOC TICs and TPH while monitoring well P-MW4S also exhibited the presence of TPH.

During the Phase II EI, a surface water sample (SW-19) and a duplicate sample were collected for 4,4-DDT analysis from the location of the Phase I surface water sample in which 4,4-DDT had been detected, as indicated in Figure 5. No 4,4-DDT was detected in the resampling effort.

#### Supplemental Investigation

A Supplemental Investigation was performed at Area P in 1989 to further define subsurface soil quality in the area where elevated subsurface organic vapor levels had been detected during the Phase I investigation. The Supplemental Investigation included the drilling of two soil borings and the collection of three subsurface soil samples for PP+40 analysis. Both borings, P-B13 and P-B14, were drilled through the berm to the northeast of the footing trench, approximately halfway between monitoring wells P-MW3S and P-MW2S (see Figure 3). A soil sample was also collected at the water table from boring P-B13. Soil samples were also collected at the water table and in the zone 2 to 4 feet above the water table at boring P-B14. Methylene chloride, bis(2-ethylhexyl)phthalate, di-n-butylphthalate, VOC TICs, SVOC TICs and inorganics were detected in the subsurface soil samples.

The Supplemental Investigation also involved the collection of a sediment sample (SD-20) from the shoreline of the Upper Atlantic City Reservoir, near Area P (see Figure 5). The sample was collected during the summer of 1989 when the reservoir was drained for repairs to the dam. Analysis revealed that no priority pollutant organic compounds were present at levels above the analytical detection limit, although inorganic analytes were detected in the sample. The sediment sample also exhibited SVOC TICs.

#### Additional Investigations

Prior to concurring with a "No Action" finding, the EPA required resampling at proposed "No Action" areas, including Area P. These investigations, conducted in 1992, included the collection of three subsurface soil samples (two samples and a duplicate sample) at a depth of 8 to 10 feet from two soil borings (P-B15 and P-B16) drilled in the bermed area northeast of Building 204, the collection of ground water samples from each of the four ground water monitoring wells (P-MW1S, P-MW2S, P-MW4S, and P-MW5S), and the collection of two sediment samples (SD-25 and SD-26) from the small stream adjacent to Area P. The sampling locations are identified on Figure 6.

All of the subsurface soil, ground water, and sediment samples were analyzed for priority pollutant VOCs. Due to the EPA's concern that the laboratory detection limits for the ground water analyses were not low enough, the four Area P wells were resampled in November 1994 and the samples were analyzed using a low concentration volatile organic analysis method which was modified to include the analytes previously included in the priority pollutant VOC analysis.

No priority pollutant VOCs were detected in the three subsurface soil samples or two sediment samples although VOC TICs were detected in one subsurface soil sample and one sediment sample.

Priority pollutant VOCs detected in ground water samples during the "No Action" area investigations include ethylbenzene and chloroform. VOC TICs were also detected in the samples from two wells.

### III. HIGHLIGHTS OF COMMUNITY PARTICIPATION

A newspaper notification of the availability of the Proposed Plan for Area P was published in the Atlantic City Press on July 24, 1996. The notice invited the public to comment on the EI/FS and Proposed Plan. The public comment period was held from July 24, 1996 through August 23, 1996. The Proposed Plan and EI/FS Reports were placed in the administrative record maintained at the Atlantic County Library.

A public meeting was held on August 15, 1996 at the Atlantic County Library. At the meeting, representatives from the FAA, FAA's environmental consultant (TRC Environmental Corporation), EPA and NJDEP were available to answer questions about Area P. The attendance list from the meeting is attached (see Appendix B). No comments on the Proposed Plan were received during the public comment period, as noted in the Responsiveness Summary, which follows this Decision Summary.

This decision document presents the selected no further action alternative for Area P of the FAA Technical Center in Atlantic County, New Jersey, chosen in accordance with CERCLA, as amended by SARA and, to the extent practicable, the NCP. The decision for Area P is based on the administrative record.

### IV. SCOPE AND ROLE OF RESPONSE ACTION

Based upon a comparison of the constituents detected at Area P to relevant regulatory or background levels, no principal threats to human health or the environment have been identified at Area P, thereby providing the basis for the "no further action" decision. It should be noted that Area P represents only one of more than 20 areas of potential environmental concern identified at the FAA Technical Center. This document addresses only Area P, and is not intended to address the entire FAA property. The other areas of concern at the FAA Technical Center will be subject to separate response action decisions.

### V. SUMMARY OF SITE CHARACTERISTICS

For each environmental medium (i.e., soil, ground water, surface water and sediment) sampled at Area P, detected concentrations of contaminants are summarized below. Based on the subsurface nature of the contamination detected at Area P, surface soils were not characterized during the EI.

#### Soil

During the EI activities at Area P, a total of twelve subsurface soil samples were collected for chemical analysis. The only priority pollutant VOC detected was methylene chloride. Methylene chloride, considered by the EPA as a common laboratory contaminant, was also detected in blank samples associated with the subsurface soil samples at levels which exceeded 10% of the highest level detected in the subsurface soil samples. Therefore, methylene chloride was eliminated from the set of subsurface soil sample results. The maximum total VOC concentration detected in subsurface soils, including VOC TICs, was 17.7 ppm. VOC TICs detected in subsurface soils primarily consisted of cycloalkanes, hydrocarbons and other unknowns.

Area P subsurface soil samples were analyzed for non-VOC priority pollutant organics during the Supplemental Investigation only. SVOC priority pollutant compounds detected in the subsurface soils include di-n-butylphthalate and bis(2-ethylhexyl)phthalate, detected at concentrations ranging from 0.084 ppm to 1.2 ppm. However, the presence of these compounds in the field blank and/or method blank allowed for their elimination from the subsurface soil data set. Tentatively identified SVOC compounds were also detected in subsurface soil samples at total concentrations ranging from 4.9 ppm to 374.9 ppm. The SVOC TICs primarily consisted of unknowns, with alkanes, hydrocarbons and aldol condensates. No PCBs or pesticides were detected in the subsurface soil samples.

Inorganics detected in the Area P subsurface soils include chromium, lead, antimony and zinc at maximum concentrations of 2.6 ppm, 3.3 ppm, 10.6 ppm and 5.3 ppm, respectively. Chromium and lead were each detected

in all three samples while antimony and zinc were detected in one sample only.

During the Phase I EI, five subsurface soil samples were collected from the footing trench and analyzed for TPH, with detected TPH levels ranging from 6.9 ppm to 43,900 ppm. These soils were removed during the subsequent interim soil removal action. An additional subsurface sample was collected from a smaller trench located north-northeast of the footing trench. It exhibited TPH at a level of 6.2 ppm.

#### Ground Water

Ground water samples were collected from a total of five monitoring wells at Area P during the EI and were analyzed for priority pollutant VOCs, total xylenes and TPH. Constituents detected in the ground water at Area P included benzene, ethylbenzene, chloroform and total xylenes.

During the Phase I investigation, benzene, ethylbenzene and xylenes were detected in the monitoring well located closest to the spill area (P-MW3S) at levels of 30 parts per billion (ppb), 13 ppb and 71 ppb, respectively. TPH was detected in each of the three monitoring wells at levels ranging from 2,100 ppb to 8,000 ppb. Methylene chloride was also present in each of the monitoring well samples at a level of 4 ppb but its presence in the trip blank allowed for its elimination from the data set. The analysis of Phase II ground water samples revealed that no VOCs were present at levels above the analytical detection limits, although trace levels of benzene (2 ppb) and ethylbenzene (2 ppb) were identified in well P-MW2S. Monitoring well P-MW2S also exhibited VOC TICs, consisting entirely of acetone, at a concentration of 110 ppb. However, the presence of acetone in the field blank allowed for its elimination from the data set. Monitoring wells P-MW2S and P-MW4S also exhibited TPH at 1,200 ppb and 3,300 ppb, respectively. Priority pollutant VOCs detected in ground water samples during the subsequent "No Action" area investigations include ethylbenzene, detected at a concentration of 0.8 ppb at well P-MW2S, and chloroform, detected at a concentration of 0.6 ppb at well P-MW25S. VOC TICs were also detected in the samples from wells P-MW1S and P-MW2S at total concentrations of 9 ppb and 64 ppb, respectively.

#### Surface Water and Sediment

A total of three surface water samples were collected from the small unnamed stream which enters the Upper Atlantic City Reservoir just to the northeast of Area P. Analysis of surface water sample SW-4, collected during the Phase I EI, revealed the pesticide 4,4-DDT at 0.15 ppb and zinc at 35 ppb. Additional SVOC TICs were also detected in this sample at a total concentration of 25 ppb, but could not be specifically identified. The environmental fate of 4,4-DDT is strongly controlled by adsorption to sediment and suspended particles. It seemed likely, therefore, that the detected 4,4-DDT may have been adsorbed to sediment suspended in the sample rather than dissolved in the surface water. A Phase II surface water sample (SW-19) and a duplicate sample (SW-19A) were collected for 4,4-DDT analysis at the same location where the Phase I surface water sample was collected. No 4,4-DDT was detected in the resampling effort, confirming that the 4,4-DDT detected in the surface water sample during Phase I was an anomalous result.

A total of four sediment samples were collected from the unnamed stream or the edge of the Upper Atlantic City Reservoir adjacent to the stream's discharge point. The Phase I EI sediment sample collected at the same location as the Phase I EI surface water sample exhibited methylene chloride at a concentration of 9 ppb, but its presence in the field blank allowed for its elimination from the data set. Other constituents detected in the sediment sample included VOC TICs at 0.022 ppm, SVOC TICs at 37.3 ppm, chromium at 4.1 ppm, and lead at 2.5 ppm. The VOC TICs and SVOC TICs consisted primarily of unknown organic compounds. During the Supplemental Investigation, the sediment sample (SD-20) collected from the shoreline of the Upper Atlantic City Reservoir near Area P exhibited no priority pollutant organic compounds at levels above the detection limit and contained inorganic analytes (including chromium, copper, lead and zinc) at concentrations ranging from 6.9 ppm to 11.2 ppm. The sediment sample also contained SVOC TICs at a total concentration of 12.2 ppm. These compounds included unknowns, adipate, and alkanes. During the "No Action" investigation, no priority pollutant VOCs were detected in the two sediment samples which were collected. Terpene, a VOC TIC, was detected at an estimated concentration of 0.006 ppm in the sediment sample collected upstream of Card Road.

## VI. SUMMARY OF SITE RISKS

To evaluate potential risks associated with the environmental media at Area P, a comparison of detected subsurface soil, ground water, surface water and sediment constituents to chemicals specific applicable or relevant and appropriate requirements (ARARs) and to-be-considered criteria (TBCs) was conducted.

Soil contaminant levels were compared to the most stringent of NJDEP's soil cleanup criteria, including residential soil cleanup criteria, non-residential soil cleanup criteria and impact to ground water soil cleanup criteria. In Area P soils, the NJDEP soil cleanup criteria were not exceeded. However, at the time the sampling was conducted, other New Jersey soil action levels were applicable to soil evaluations. The maximum total concentrations of VOCs and SVOCs exceeded these soil action levels. The majority of the constituents which comprise the total VOC and SVOC compounds detected at Area P are unknowns, and therefore cannot be classified as carcinogens or noncarcinogens. However, the priority pollutant analyses determined that the known priority pollutant VOC and SVOC carcinogens are typically absent in these samples. Considering the general lack of priority pollutant carcinogenic VOCs and SVOCs, the low concentrations of unknown compounds, and the fact that contaminant concentrations do not conflict with current New Jersey soil cleanup criteria, soil at Area P evidences no significant threat to human health or the environment.

Promulgated state and federal standards (i.e., federal and state Maximum Contaminant Levels (MCLs) and Ground Water Quality Standards) were used to evaluate ground water contamination. The New Jersey Ground Water Quality Standards state that for Class I-Pineland (Protection Area) ground water, as in the case of Area P, the ground water quality standard shall be the background water quality. Where a constituent standard (i.e., background) is of a lower concentration than the practical quantitation level (PQL), a discharge is not considered to contravene the standard as long as the ground water concentration is less than the PQL. Therefore, in the following discussions contaminant levels are compared to MCLs and PQLs.

One ground water sample collected at monitoring well P-MW3S exhibited benzene at a concentration which exceeded the federal MCL and total xylenes at a concentration which exceeded the New Jersey MCL. As a result of site construction activities, monitoring well P-MW3S was destroyed and subsequently replaced with monitoring well P-MW4S; therefore, well P-MW3S could not be resampled. Samples collected from well P-MW4S during the Phase II EI and "No Action" area investigations did not exhibit concentrations of benzene and total xylenes above the federal or state MCLs or PQLs. Analysis of a ground water sample collected at well P-MW2S during the Phase II EI revealed a concentration of benzene (2 ppb) slightly above the New Jersey MCL and PQL of 1 ppb. Subsequent sampling, however, did not confirm this result. While Phase I and Phase II ground water samples exhibited TPH at levels of 1,200 ppb to 8,000 ppb, no state or federal standards or guidelines were identified for TPH concentrations in ground water, and subsequent sampling did not identify the presence of VOCs at elevated levels.

A surface water sample collected from the stream adjacent to Area P during the Phase I EI exhibited 4,4-DDT at a level of 0.15 ppb, which exceeds federal Ambient Water Quality Criteria and State Surface Water Quality Standards. However, resampling during the Phase II EI did not confirm the presence of this pesticide in the surface water. Zinc, the only other constituent detected in the surface water, did not exceed current surface water quality criteria. Sediment samples exhibited organic TICs, for which there are no sediment quality screening criteria, and inorganics which do not exceed current sediment quality screening criteria.

In conclusion, based on an analysis of the levels of organic and inorganic constituents detected in subsurface soils, ground water, surface water and sediment at Area P, the environmental media at Area P evidence no significant threat to human health or the environment.

## VII. DESCRIPTION OF THE "NO ACTION" ALTERNATIVE

The preferred alternative for Area P at the FAA Technical Center is No Further Action. Results obtained from the environmental investigations have shown that the levels of contamination are generally below background levels or current NJDEP soil cleanup criteria and are less than federal and state ARARs. Total contaminant levels in subsurface soil for certain classes of chemicals slightly exceeded former action levels, which served as an indicator of the need for further investigations. The compounds which comprise the total values for these chemical classes, however, generally consist of non-carcinogenic priority pollutants or unknown

tentatively identified compounds. Considering the general lack of priority pollutant carcinogenic VOCs and SVOCs, the low concentrations of unknown compounds, and the fact that contaminant concentrations do not conflict with current New Jersey soil cleanup criteria, soil at Area P evidences no significant threat to human health of the environment. In the ground water at Area P, the previous detection of organics at levels exceeding federal or state standards was not confirmed in recent sampling rounds. Surface water and sediment quality has also met existing criteria during recent sampling events. Based on this evaluation, it has been determined that Area P presents no significant threat to human health and the environment. Therefore, no further remedial activities, exposure controls or monitoring are necessary at Area P.

After reviewing the existing data base for Area P, the NJDEP and Pinelands Commission have indicated concurrence with the Proposed Plan of No Further Action. Copies of the declarations of concurrence are attached as Appendix A.

#### VIII. DOCUMENTATION OF NO SIGNIFICANT CHANGES

The Proposed Plan for Area P was released for public comment on July 24, 1996. The Proposed Plan concluded that No Further Action is required to ensure protection of human health and the environment at Area P. The FAA received no written or verbal comments on the Proposed Plan, either during the public meeting or the subsequent 30-day comment period. Consequently, it has been determined that no significant changes to the remedy, as originally identified in the Proposed Plan, are necessary.

#### RESPONSIVENESS SUMMARY

##### RECORD OF DECISION

Area P - Building 204 Fuel Spill Area  
FAA William J. Hughes Technical Center

The purpose of this Responsiveness Summary is to review public response to the Proposed Plan for Area P. It also documents the FAA's consideration of such comments during the decision-making process and provides answers to any major comments raised during the public comment period.

The Responsiveness Summary is divided into the following sections:

- ! Overview - This section briefly describes the selected remedy and any changes to the remedy from that included in the Proposed Plan for Area P.
- ! Background on Community Development - This section provides a summary of community interest in Area P and identifies key public issues. It also describes community relations activities conducted with respect to this area of concern.
- ! Summary of Major Questions and Comments - This section summarizes verbal and written comments received during the public meeting and public comment period.

#### I. OVERVIEW

The FAA William J. Hughes Technical Center is located at the Atlantic City International Airport in Atlantic County, New Jersey. Area P is located at Building 204 in the Research and Development area of the FAA Technical Center, south of the Upper Atlantic City Reservoir. This Responsiveness Summary Addresses public response to the Proposed Plan for Area P only. The Proposed Plan and other supporting information for Area P are available for public review at the Atlantic County Library, 2 South Farragut Avenue, Mays Landing, New Jersey.

#### II. BACKGROUND ON COMMUNITY INVOLVEMENT

This section provides a brief history of community participation in the Environmental

Investigation/Feasibility Study (EI/FS) activities conducted at Area P.

Throughout the investigation period, the U.S. Environmental Protection Agency (EPA), New Jersey Department of Environmental Protection (NJDEP), Atlantic County Department of Health and the Pinelands Commission have been directly involved through proposal and project review and comments. Periodic meetings have been held to maintain open lines of communication and to keep all parties abreast of current activities.

On July 24, 1996, a newspaper notification was published in the Atlantic City Press inviting the public to comment on the EI/FS process and Proposed Plan. The announcement also identified the time and location of a public meeting to be held to discuss the proposed remedial action, the location of the information repository, the length of the public comment period, and the address to which written comments could be sent. Public comments were accepted from July 24, 1996 through August 23, 1996.

A public meeting was held on August 15, 1996 at the Atlantic County Library in Mays Landing, New Jersey. The Area P EI/FS results were discussed. The FAA was represented by Keith C. Buch, Program Manager, Environmental Section. Betsy Donovan, Remedial Project Manager, Federal Facilities Section represented the EPA Emergency and Remedial Response Division, and Ian Curtis, Case Manager, represented the NJDEP Bureau of Federal Case Management. Sean Clancy represented the Atlantic County Health Department. TRC Environmental Corporation, FAA's environmental contractor, also attended. The complete attendance list is provided as Appendix B to this Record of Decision. A transcript of the public meeting is provided as Appendix C.

### III. SUMMARY OF MAJOR QUESTIONS AND COMMENTS

No questions or comments with regard to the Proposed Plan for Area P were raised at the public meeting held on August 15, 1996. In addition, no written comments were received during the thirty-day public comment period.

APPENDIX A

NJDEP AND PINELANDS COMMISSION  
LETTERS OF CONCURRENCE

<IMG SRC 97009H>

Dear Mr. Buch,

Re: Area P Proposed Plan  
FAA Technical Center  
Egg Harbor Township, Atlantic County

The New Jersey Department of Environmental Protection (NJDEP) has reviewed the Draft Final No Further Action Proposed Plan for Area P of the Federal Aviation Administration (FAA) Superfund Site located in Egg Harbor Township, Atlantic County and we have no comments on the submitted document.

Background

Area P is located at Building 24 in the Research and Development area south of the Upper Atlantic City Reservoir. The building is used to conduct velocity experiments on various aircraft components. During excavation of a footing for an addition to Building 204, construction contractors encountered a significant quantity of fuel in the soils southeast of the building at a depth of three to four feet. The source of this fuel was determined to be a leak in a valve pit near the southeast corner of Building 204. The valve pit was associated with piping which passed from two 10,000-gallon underground JP-4 jet fuel storage tanks to Building 204. The two underground jet fuel storage tanks were removed on October 28 and November 7, 1991 as part of the ongoing storage tank management program.

After excavating contaminated soils, numerous investigations of soil, ground water, sediment and surface water, was conducted. Minor contamination was revealed in the soils and ground water. However, none of the contaminants were consistently found to occur in either media. In 1994, the USEPA required the FAA to sample all proposed "no further action" areas (Area P being one such area). This investigation concluded that the levels of organic and inorganic constituents detected in subsurface soils, ground water, surface water and sediment at Area P were below New Jersey required contaminant concentrations.

Conclusion

The Proposed Plan appropriately addresses New Jersey regulation and policy. By the letter dated March 4, 1996 from Todd DeJesus of the Pinelands Commission, it is our understanding that the Pinelands Commission approves of the Proposed Plan. Therefore, based on the Site Remediation Programs review we have no comments on the Proposed Plan submitted. Concurrence is reserved for the final Record of Decision. If you should have any questions or require additional information, please do not hesitate to contact me at (609) 633-7232.

<IMG SRC 97009I>

c. Todd DeJesus, Pinelands Commission  
Betsy Donovan, USEPA - Region II  
Steve Byrnes, BEERA  
George Nicholas, BGWPA

<IMG SRC 97009J>

THE PINELANDS COMMISSION  
PO BOX 7  
New Lisbon NJ 08064  
(609) 894-9342

CHRISTINE TODD WHITMAN  
Governor

June 11, 1996

Ian Curtis  
NJDEP  
CN 028  
401 East State Street  
Trenton, NJ 08625-0028

Please Always Refer To  
This Application Number

RE: App. No. 87-0046.13  
FAA Technical Center  
Area P, Building 204  
Fuel Spill Area  
Egg Harbor Township

Dear Mr. Curtis:

The Commission staff has reviewed the May, 1996 Draft Final Superfund Proposed Plan regarding the cleanup of hazardous substances on the above referenced site.

The Plan and proposed "no further action" recommendation does not raise any significant issues regarding compliance with the standards of the Pinelands Comprehensive Management Plan. In accordance with the Memorandum of Agreement between our two agencies, no further action is necessary by the Pinelands Commission.

The Commission must be copied on all future monitoring reports or any additional correspondence between the DEP and any other involved parties. Specifically, we will need a copy of the proposed Record of Decision. Please be advised that if any remediation is necessary in the future, an application to the Commission will be required.

<IMG SRC 97009K>

The Pinelands - Our Country's First National Reserve and an International Biosphere Reserve

If you have any questions, please contact our development review staff.

<IMG SRC 97009J>

WFH/TD

cc: Keith Buch  
Jean Oliva

APPENDIX B  
PUBLIC MEETING ATTENDANCE LIST  
<IMG SRC 97009M>  
APPENDIX C

PUBLIC MEETING TRANSCRIPT

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PUBLIC MEETING  
To Discuss the Proposed Remedial Action at  
Area A - R&D Navy Landfill  
Area J - Excavation Area Near Runway  
Area N - Catapult Test Area At Building 214  
Area P - Building 204 Fuel Spill Area

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FAA TECHNICAL CENTER  
Atlantic City International Airport, NJ

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Thursday, August 15, 1996

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2:00 p.m.

Atlantic County Library

2 South Farragut Avenue

Mays Landing, NJ 08330

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13

APPEARANCES

14

For the FAA Technical Center: KEITH C. BUCH, Program Manager  
FAA Technical Center

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For TRC Environmental Corp.: LARRY BUTLIEN, Project Hydro-  
geologist, TRC Environmental  
Corporation

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JEAN M. OLIVA, P.E., Project  
Engineer, TRC Environmental  
Corporation

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GCI TRANSCRIPTION AND RECORDING SERVICES

23

505 HAMILTON AVENUE, Suite 107

LINWOOD, NEW JERSEY 08221

24

(609) 927-0299 FAX (609) 927-6420

1-800-471-0299

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I N D E X

1		
2	Opening Remarks and Introductions	Page 3
3	Keith C. Buch, Program Manager FAA Technical Center	
4	Proposed Plan Presentation	Page 3
5	Areas A and J Larry Butlien, Project Hydrogeologist TRC Environmental Corporation	
6		
7	Proposed Plan Presentation	Page 6
8	Areas N and P Jean M. Oliva, P.E., Project Engineer TRC Environmental Corporation	
9	Final Remarks	Page 10
10	Questions and Answers	None

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8-15-96

1 (Tape #CP-12-96, Index #0200 - 2:00 p.m.)

2 MR. BUCH: Good afternoon. My name is Keith Buch.  
3 I'm the Superfund Program Manager for the William J. Hughes  
4 Technical Center in Egg Harbor Township. The purpose of  
5 today's meeting is to solicit public input on our no action  
6 areas, Areas A, J, N and P. The public comment period will  
7 close on Oct -- excuse me, August 23rd, 1996. Notice of this  
8 meeting today was duly advertised in the Press of Atlantic  
9 City. Welcome. At this point, I shall introduce Larry  
10 Butlien, the Project Hydrogeologist from TRC, to go over  
11 geological aspects of Areas A, J, N and P. Afterwards, Jean  
12 Oliva, a Project Engineer from TRC, will speak on the risk  
13 assessments aspects A, J, N and P. Larry, welcome.

14 MR. BUTLIEN: Thank you, Keith. As Keith men-  
15 tioned, my name is Larry Butlien. I'm the Hydrogeologist  
16 with TRC Environmental Corporation. Today Jean Oliva and  
17 myself will be discussing the background and history of envi-  
18 ronmental investigations at four areas of concern at the  
19 William J. Hughes Technical Center. The first area is Area A  
20 - the R&D Navy Landfill; Area J - the Excavation Area near  
21 the Runway; Area N - the Catapult Test Area at Building 214;  
22 and finally, Area P which is the Building 204 Fuel Spill  
23 Area. Each site will be discussed separately beginning with  
24 Area A.

25 \* \* \* \* \*

1 (SLIDE PRESENTATION)

2 Area A is located in the Research and Development  
3 portion of the Technical Center, south of the Upper Atlantic  
4 City Reservoir.

5 Area A is referred to as the R&D Navy Landfill because  
6 waste disposal activities occurred in the northern part of  
7 the site during the 1940s and 1950s. A borrow pit area was  
8 located in the southern portion of the site and some  
9 construction debris was also disposed of in this area.

10 Currently, a firing range is located within the borrow pit  
11 area. The ground water production well which is used only  
12 for sanitary purposes is located in Building 224, north of  
13 the firing range.

14 This photograph was taken in 1987 and shows the northern  
15 part of Area A where disposal activities took place. Note  
16 how the area has become heavily overgrown with trees and  
17 undergrowth.

18 This photo was also taken in 1987 and shows the southern  
19 portion of Area A where the firing range is currently  
20 located. This view is looking toward the southwest.

21 Area A was investigated to determine if past disposal  
22 practices had impacted soil or ground water quality.  
23 Investigations included various site surveys and soil and  
24 ground water sampling.

25 This slide shows the various sampling locations at Area

1 A. A soil gas anomaly was identified in the southern portion  
2 of the site and it was determined to be attributable to  
3 naturally decaying material. The ground water flow direction  
4 is toward the northeast, as depicted by this yellow arrow,  
5 and quarterly ground water sampling of monitoring wells 3S  
6 and 4S, which are these two right here, that's 3S and 4S,  
7 have been conducted since February of 1993.

8 This photograph shows the installation of monitoring  
9 well 4S which is located near Building 224.

10 All the soil borings generally did not identify the  
11 presence of subsurface waste materials. While PCBs were  
12 detected in one subsurface soil sample at an elevated level,  
13 their presence was not confirmed by resampling. Similarly,  
14 elevated levels of inorganics were initially identified in  
15 ground water samples, but also they were not confirmed  
16 through subsequent sampling. Chloroform was the only  
17 contaminant consistently detected in two wells above State  
18 ground water quality standards.

19 The Area A risk assessment concluded that the site poses  
20 no unacceptable risks to human health or the environment,  
21 although the consistent detection of chloroform in the two  
22 wells at levels exceeding the State ground water quality  
23 standard justifies the performance of continued ground water  
24 monitoring.

25 Therefore, the proposed plan for Area A is continued

1 ground water monitoring to ensure the contaminant  
2 concentrations do not pose a threat to the human health or  
3 the environment in the future.

4 The next area which we will discuss is Area J, the  
5 Excavation Area near the Runway. As you can see in this site  
6 plan, Area J is located adjacent to the main runways at the  
7 airport.

8 Area J was the site of a large excavation in 1962 which  
9 was based on a review of aerial photographs. In 1974 the  
10 area had been graded and seeded and is currently grass-  
11 covered.

12 It's pretty dark, but this photograph was taken in 1987  
13 and shows the grass-covered Area J in the foreground with the  
14 Atlantic City International Airport plane taxiway, ramp and  
15 tarmac in the background.

16 Area J was investigated to determine if the area had  
17 been used as a landfill and if any environmental impacts had  
18 been subsequently occurred. Investigations included various  
19 site surveys and the installation and ground water sampling  
20 of three monitoring wells.

21 This slide shows the locations of the three monitoring  
22 wells at Area J. These -- as I said before, these wells were  
23 installed to characterize the quality of ground water at the  
24 site, and as depicted by this yellow arrow, ground water flow  
25 is generally in the southeast direction.



1 propel a 120-gallon tank of fuel down a ramp and past an  
2 ignition source. The result was a large fireball and  
3 explosion which occurred down in this area that was  
4 surrounded by an earthen berm. These tests were conducted in  
5 the early 1960s and were followed by the performance of  
6 vehicle crash tests in the same area.

7 This slide is a file photo taken in the early 1960s of  
8 one of the fuel test experiments and as you can see it  
9 resulted in a rather large fireball. And this is just  
10 another view of the fireball.

11 And this is a photo of the site as it appeared in 1988  
12 with the earthen berm and the end of the catapult ramp where  
13 the explosions occurred.

14 Area N was investigated to determine if the fuel testing  
15 or vehicle crash tests had resulted in contamination to soil  
16 or ground water. The site investigations included a site  
17 survey, soil borings, and monitoring wells.

18 This slide shows the locations at which sampling was  
19 conducted at Area N. An area of elevated soil gas readings  
20 was identified in the western portion of the site. Soil  
21 samples were collected from around the earthen berm and from  
22 the area of the elevated soil readings. A boring was  
23 drilled through the earthen berm and wells were installed  
24 north of the area in the anticipated direction of ground  
25 water flow.

1 Site investigations did not identify the presence of  
2 significant soil or ground water contamination. While  
3 elevated inorganic levels were detected in the ground water  
4 during the first round of sampling, these levels were not  
5 confirmed by -- during resampling efforts.

6 In general, the contaminant levels at Area N are below  
7 applicable regulatory standards and where elevated levels  
8 were detected they could not be confirmed through resampling.  
9 Therefore, the risk evaluation for Area -- concluded that the  
10 site does not pose an unacceptable risk to human health or  
11 the environment. And, therefore, the preferred remedy for  
12 Area N is no action.

13 The last site we'll discuss is Area P, the Building 204  
14 Fuel Spill Area. Area P is also located in the Research and  
15 Development portion of the Tech Center. Again, south of the  
16 Upper Atlantic City Reservoir and between Areas A and N.

17 In 1987, during the excavation of a footing for a  
18 building addition, a subsurface fuel spill was discovered at  
19 Area P. The source of the spill was determined to be a valve  
20 pit which was associated with two underground JP-4 jet fuel  
21 storage tanks which have since been removed.

22 This is a photograph taken of the footing excavation in  
23 which the contamination was discovered.

24 And this is a photograph of the valve pit which was  
25 determined to be the source of the contamination.

1           Upon discovery of the fuel spill, soil sampling was  
2 conducted in the footing excavation to determine the nature  
3 and extent of the contamination. Based on those soil sample  
4 results an interim removal action was taken which consisted  
5 of soil and ground water removal and off-site disposal. And  
6 following that effort additional investigations were  
7 conducted downgradient of the valve pit including soil  
8 borings, monitoring wells, and sediment and surface water  
9 sampling.

10           This photo was taken during the interim soil removal  
11 effort. You can see the backhoe excavating the soil.

12           And this slide shows the sampling locations at Area P.  
13 The ground water flow direction at Area P is to the northeast  
14 so most of the investigations were centered around the area  
15 downgradient of the valve pit source area.

16           Site investigations indicated that the interim removal  
17 actions had removed the most highly contaminated materials  
18 and no long-term environmental impacts could be identified.

19           In general the contaminant levels at Area P are below  
20 regulatory cleanup standards or, where detected at  
21 elevated levels, could not be confirmed by resampling.  
22 Therefore, the Area P risk evaluation concluded that the site  
23 does not pose unacceptable risks to human health or the  
24 environment. And the preferred remedy for Area P is no  
25 further action.

1           In summary, the preferred remedy for Areas J, N and P is  
2 no further action and the preferred remedy for Area A is  
3 continued ground water monitoring. The EPA and New Jersey  
4 DEP have indicated concurrence with this proposed plan  
5 pending public comment.

6           And this last slide summarizes the decision process  
7 which will be used to develop the final Record of Decision.  
8 Public comments will be accepted. Written comments will be  
9 accepted through August 23rd and verbal comments will be  
10 accepted here this afternoon. And those comments will be  
11 documented in the final Record of Decision and Responsiveness  
12 Summary which will be available here in the Administrative  
13 Record at the Atlantic County Library reference section, and  
14 the notice will appear in the Press of Atlantic City.  
15 Keith, I will now turn the presentation back to you.

16           MR. BUCH: Thank you, Jean and Larry, for the  
17 comprehensive but brief explanation of our investigation and  
18 decision making process for A, J, N and P. At this point  
19 I'll open up the floor to any questions that interested  
20 members of the public may pose to either myself, as of an  
21 administrative nature, or to Jean or Larry of the technical  
22 nature. Seeing no questions, the public portion of the  
23 meeting is now closed and the meeting is over. Have a safe  
24 trip home.  
25 (End - Tape CP-12-96, at Index #0706 - 2:25 p.m.)

8-15-96

1 \* \* \* \* \*

2 C E R T I F I C A T I O N

3 I, CAROL PLATT, agent for GCI TRANSCRIPTION AND

4 RECORDING SERVICES, a Notary Public and State- and Federal-

5 ly-Approved Sound Recording operator and transcriber, do

6 hereby certify that the foregoing is a true and accurate

7 transcript of the PUBLIC MEETING OF THE TRC ENVIRONMENTAL

8 CORPORATION taken by electronic sound recording at the time,

9 place, and on the date hereinbefore set forth.

10 <IMG SRC 97009N>

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ROD FACT SHEET

SITE

Name: FAA Technical Center  
Area P - Building 204 Fuel Spill

Location: Atlantic County, NJ

EPA Region: U.S. EPA Region II

HRS Score: 39.65; 12/09/88

NPL Listing: 8/30/90

Site ID #: NJ9690510020

ROD

Date Signed: EPA 2/13/97  
FAA 1/13/97

Remedy: No Further Action

LEAD

Remedial: Federal Facility (Federal Aviation Administration)

Primary contact: Keith Buch, Project Manager, FAA (609) 485-6644

Secondary contact: Betsy Donovan, RPM, EPA (212) 637-4303

WASTE

Type: VOCs - below federal & state standards

Media: ground water, soils, sediment

Origin: jet fuel

Quantity: unknown