



DEPARTMENT OF THE AIR FORCE  
75TH CIVIL ENGINEER GROUP (AFMC)  
HILL AIR FORCE BASE UTAH

1289196 - R8 SDMS

7 November 2013

Environmental Restoration Branch  
75th CEG/CENR  
7274 Wardleigh Road  
Hill Air Force Base, Utah 84056-5137

Ms. Sandra Bourgeois  
USEPA Region VIII, (EPR-FF)  
1595 Wynkoop Street  
Denver, CO 80202-1129

Dear Ms. Bourgeois

Attached please find the *Final Operable Unit 6 Site OT026 Former Waste Asphalt Pile Explanation of Significant Differences (November 2013)* along with four copies of the U. S. Environmental Protection Agency (EPA) signature page. After signatures have been obtained, please send one copy of the signature page back to us (Hill Air Force Base), send one copy to Utah Department of Environmental Quality, and retain two for EPA. After we have received the signature pages back from both agencies, we will send you a compact disk of the final report which will include the signature pages from all three agencies for your records.

In order to complete the Explanation of Significant Differences for Operable Unit 6, we respectfully request that you return your signature page to us by November 29, 2013.

Please feel free to contact our Hill Air Force Base Project Manager, Mr. Alan Jones at (801) 775-6910 if you have any questions regarding this document.

Sincerely

JARROD D. CASE, P.E.  
Remedial Project Manager  
Environmental Restoration Branch  
75th Civil Engineer Group

Attachments:

1. Final Operable Unit 6 Site OT026 Former Waste Asphalt Pile Explanation of Significant Differences (November 2013). (2) Hard copies
2. Signature pages (4) Hard copies



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## **Hill Air Force Base, Utah**

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Final

**Operable Unit 6 Site OT026  
Former Waste Asphalt Pile  
Explanation of Significant Differences**

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NOVEMBER 2013

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# *Hill Air Force Base Performance-Based Remediation*

## Operable Unit 6 Site OT026 Former Waste Asphalt Pile Explanation of Significant Differences

Contract No: FA8903-09-D-8560  
Task Order 0006

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NOVEMBER 2013

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# Acronyms and Abbreviations

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µg/kg	Microgram(s) per kilogram
µg/L	Microgram(s) per liter
AFB	Air Force Base
AGRC	Automated Geographic Reference Center
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DCE	Dichloroethene
EPA	U.S. Environmental Protection Agency
ERPIMS	Environmental Resources Program Information Management System
ESD	Explanation of Significant Differences
MCL	Maximum Contaminant Level
mg/L	Milligram(s) per liter
OU	Operable Unit
POTW	Publicly owned treatment works
RAB	Restoration Advisory Board
ROD	Record of Decision
TCE	Trichloroethene
UDEQ	Utah Department of Environmental Quality
USAF	U.S. Air Force



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# 1.0 Introduction

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This Explanation of Significant Differences (ESD) relates to remedial actions selected by the U.S. Air Force (USAF) for implementation at Operable Unit (OU) 6 at Hill Air Force Base (AFB), Utah, in a Record of Decision (ROD) issued in August 1997. This site has undergone additional evaluation (MWH Americas, Inc. 2011) since the remedy was implemented suggesting that additional measures may reduce the life-cycle costs associated with remediation. This OU 6 ESD presents activities to reduce the energy usage and operation and maintenance costs associated with achieving the Remedial Action Objectives for OU 6.

OU 6 is located in the northern region of Hill AFB and extends off-Base to the north (Figure 1). The remedy for OU 6 was developed according to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. The site remedial investigation and feasibility study was conducted according to CERCLA guidance under the Federal Facility Agreement between the USAF, U.S. Environmental Protection Agency (EPA), and Utah Department of Environmental Quality (UDEQ). Following the *Final Remedial Investigation Report for Operable Unit 6* (Radian Corporation 1995) and the *Final Feasibility Study for Operable Unit 6* (Radian International LLC 1996a), the *Final Proposed Plan for Operable Unit 6* (Radian International LLC 1996b) and the *Final Record of Decision for Operable Unit 6* (Radian International LLC 1997) were accepted. The final signature on the ROD was dated 8 April 1998. A previous *Explanation of Significant Difference for Operable Unit 6* (Hill AFB Environmental Restoration Branch 2007) documents changes that were implemented to the remedy presented in the ROD.

OU 6 contains two Installation Restoration Program sites. This ESD pertains to the remedy for Site OT026, also called the east plume. There are no changes proposed to the remedy for Site ST022, also called the west plume.

In accordance with the ROD for OU 6, the remedy for Site OT026 consists of on-Base and off-Base pump and treat systems to address groundwater impacts in the shallow aquifer. Based on an evaluation of the existing pump and treat systems, modification of the on-Base pump and treat system to discontinue the use of the existing air stripper treatment system and discharge water directly to the North Davis Sewer District publicly owned treatment works (POTW) was recommended (MWH Americas, Inc. 2011).

As a result of an assessment of the ongoing remedy at Site OT026, an optimized remediation strategy will be implemented. Under the Federal Facility Agreement and Executive Order 12580, Hill AFB is the lead agency for all CERCLA actions, and UDEQ and EPA are support agencies. As specified in the Federal Facility Agreement, Hill AFB needs concurrence from both the EPA and UDEQ for significant decisions involving cleanup strategy, goals, and methods. This ESD is issued in accordance with Section 117(c) of CERCLA 42 U.S. Code Section 9617(c) and 40 Code of Federal Regulations Section 300.435(c)(2)(i and ii) of the National Oil and Hazardous Substances Pollution Contingency Plan, which requires the USAF to issue such a document where a remedial action will differ in any significant, but not fundamental, respect from that selected by the USAF and described in the ROD. It has been prepared to provide stakeholders with an explanation of the nature of the modification to the selected remedy set forth in the ROD and to summarize the information that supports this modification.

The ESD will become part of the Administrative Record File in the information repository for Hill AFB, which is available for public review at the following locations:

**Weber State University**

*Stewart Library*

2901 University Circle  
Ogden, Utah 84408-2901

Tel: (801) 626-6545

**Davis County**

*WSU Davis Campus Library*

2750 N. University Park Blvd.  
Layton, Utah 84041-9099

Tel: (801) 395-3472

**Hill AFB Administrative  
Records**

75 CEG/CEVR

7274 Wardleigh Road

Building 5, Bay U

Hill Air Force Base, Utah

84056-5137

**Hours vary with academic  
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[http://library.weber.edu/sas/  
hours/hours.cfm](http://library.weber.edu/sas/hours/hours.cfm)

**Hours vary with academic  
schedule:**

[http://library.weber.edu/ref/davis  
/default.cfm](http://library.weber.edu/ref/davis/default.cfm)

**Hours:**

Mon.-Fri.: 7:30 a.m. – 4:30 p.m.

By Appt: (801) 775-6914

The USAF concludes that the remedy selected in the ROD, as modified by this ESD, is expected to meet the objectives and performance standards of the ROD.

## 2.0 Summary of the Site History, Site Conditions, and Selected Remedy

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Hill AFB is located in northern Utah, approximately 25 miles north of Salt Lake City and 5 miles south of Ogden. Since 1920, the property currently comprising Hill AFB has been used in service of the nation's defense. Operations have included munitions storage; manufacturing; and repairing, testing, and maintaining aircraft and other weapon systems. The industrial operations to perform this work required the use of numerous chemicals and generated various waste products.

For many years, chemicals and associated waste products were disposed in chemical disposal pits and landfills or released from storage or process areas. Since the 1970s, Hill AFB has changed its operations to reduce or eliminate its use of numerous chemicals and has developed waste management, storage, and disposal procedures that meet the stringent state and federal requirements adopted by regulatory agencies over the last 40 years.

OU 6 contains two Installation Restoration Program sites. Site OT026, known as the east plume, consists of an approximately 67-acre trichloroethene (TCE) plume that extends from the Zone 20 Building Complex on-Base to off-Base areas under the Craigdale subdivision in Riverdale, Utah (Figure 2). The former source of the east plume is located in the Zone 20 Building Complex and may originate from several small undocumented releases, a leaky underground storage tank that contained solvents, and possibly from a former dry cleaning operation that primarily cleaned shop rags (Radian Corporation 1995). Located off-Base, on private property within the east plume aquifer, is the Cooley's Pond area. Cooley's Pond is a small pond, fed by Spring U6-303 (Cooley's Garage Spring). TCE has been detected in surface water from Spring U6-303 and Cooley's Pond.

The west plume (ST022) is contained on-Base in the Zone 19 Building Complex (Figure 2). The primary contaminant of concern at the site is TCE in groundwater that may have resulted from the use of solvents containing TCE in Building 1915, which was subsequently discharged to the building's drain field. A Remedial Action Completion Report is currently (June 2013) under review for closure of ST022 (west plume).

The geology of the east plume aquifer is complex and typically consists of intricately layered fine-grained sands, silts, and clays (Radian Corporation 1995). The east plume groundwater is being continuously monitored and remediated with on- and off-Base groundwater extraction and treatment systems. A limited area of subsurface soil in the on-Base source area is contaminated with 1,1-dichloroethene (DCE). Exposure to the soil is restricted through implementation of institutional controls.

The ROD for OU 6 (Radian International LLC 1997) established the following remedial action objectives:

- "Restore the groundwater aquifer, seeps and springs, and Cooley's Pond water to TCE concentrations of 5 µg/L [micrograms per liter] or less (i.e., the drinking water standard), which results in a risk that is protective of human health."
- "Prevent human exposures to 1,1-DCE in on-Base subsurface soil that lead to a total excess cancer risk for 1,1-DCE greater than 10<sup>-6</sup>. This corresponds to a concentration of 26 µg/kg [micrograms per kilogram] or lower."

The area of attainment for groundwater is the area in which TCE exceeds the Maximum Contaminant Level (MCL) of 5 µg/L, and the area of attainment for subsurface soil is the area in which 1,1-DCE concentrations exceed 26 µg/kg.

The remedy for OU 6, as documented in the ROD, is as follows:

- Continued operation of the off-Base groundwater extraction and treatment system at the main arm of the off-Base east plume. At the time, extracted groundwater was treated with an air stripper and then discharged to the storm sewer.
- Installation and operation of an on-Base groundwater extraction and treatment system at the main arm of the on-Base east plume. Extracted groundwater is treated with an air stripper and then discharged into the shallow aquifer via a subsurface drain field (Figure 2). The ROD also specified installation of a connection to the North Davis Sewer District POTW to provide the option of discharging the treated water to the POTW.
- Treatment of the springs and field drains (refer to Figure 2 for locations). Spring U6-303 (Cooley's Garage Spring) and the water in Cooley's Pond were treated by activated carbon or air stripping treatment systems, field drain outfall U6-603/604 was treated by volatilization in a piped channel, and field drain U6-606 would be treated in an air stripper if contaminated flow remained 5 years after startup of the off-Base treatment system.
- Natural attenuation of groundwater from the west plume.
- Continued groundwater monitoring.
- Implementation of institutional controls including water rights restrictions, easements and leases for monitoring and equipment, and fencing to restrict access to exposure areas.
- Provisions of alternate water supplies, if needed, to any residents using spring or field drain water for irrigation.

Two changes to the 1997 ROD were documented in the 2007 ESD. The air stripper for the off-Base groundwater extraction system was taken offline in November 2002 with EPA and UDEQ concurrence. TCE concentrations were below the applicable discharge limit (30 µg/L for discharge to the Weber River) in the untreated groundwater; therefore, air stripper treatment was no longer required.

The second change documented in the 2007 ESD pertained to treatment of water from Spring U6-303. The air stripper treatment system, which treated TCE-contaminated water from Spring U6-303 and Cooley's Pond, was shut down in October 2002 because TCE concentrations in both the Spring and Pond had decreased below MCLs. However, a temporary activated carbon system was subsequently installed to treat the Spring U6-303 water due to a rebound in TCE concentrations. Use of the activated carbon system was continued until May 2010 when TCE concentrations decreased below the MCL of 5 µg/L.

The ESD also documented a permanent remedy of rerouting the Spring U6-303 discharge to the existing conveyance piping for the off-Base pump and treat system. This remedy was determined to be appropriate since the Spring U6-303 TCE concentrations were below the discharge limit of 30 µg/L for the Weber River. Should Spring U6-303 TCE concentrations increase such that the total influent concentration of that flow, combined with the flows of the off-Base extraction wells, exceeds 30 µg/L at the point of compliance, then the off-Base groundwater treatment system air stripper would be turned

back on. However, due to the low concentrations and availability of the granular activated carbon system to treat Spring U6-303 water below the MCL, the Spring U6-303 discharge has not been rerouted to the conveyance for the pump and treat system.

Compliance sampling locations U6-603/604 (Storm Sewer Outfall) were formerly located along the off-Base pump and treat system open-channel discharge to a storm drain that ultimately flows to the Weber River. When the off-Base pump and treat system was first started in 1996, the storm drain was not completely lined (i.e., an open ditch) and the unlined portions of the storm drain were over an area subject to Utah groundwater protection standards. In Fall 2001, the storm drain was completely lined during commercial development and sample locations U6-603/604 were eliminated. The current point of compliance for the Weber River is the effluent discharge point from the off-Base pump and treat system process building (Figure 2).

Spring U6-606 is located on the property occupied by the off-Base pump and treat system process building (Figure 2). Spring U6-606 is monitored annually, and the air stripper treatment option provided in the ROD has not been necessary.

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## 3.0 Description of and Basis for the Differences

Table 1 presents a summary comparison between the remedy component in the ROD for OU 6 and the changes described in this ESD.

TABLE 1

Comparison between Existing Remedy and Explanation of Significant Differences Changes  
*Operable Unit 6 Site OT026 Explanation of Significant Differences, Hill Air Force Base, Utah*

	Existing OU 6 Remedy	Documented Differences
East Plume – On-Base Remedial System	Operation of an on-Base groundwater extraction and treatment system. Extracted groundwater is treated in an air stripper and then discharged into the shallow aquifer via a subsurface drain field. The ROD also specified installation of a connection to the North Davis Sewer District POTW to provide the option of discharging the treated water to the POTW.	Discontinue use of the air stripper and discharge extracted groundwater to the POTW via the existing connection.

### 3.1 Discontinuation of the Air Stripper for the On-Base Pump and Treat System

The on-Base pump and treat system will be modified to discontinue use of the air stripper and drain field. Alternatively, extracted groundwater will be discharged directly to the North Davis County Sewer District POTW. This disposal method was identified as an option in the ROD, and the system was constructed with a connection to the sanitary sewer (Figure 2). This ESD has been prepared to document a difference from the ROD (i.e., discontinuation of the on-Base air stripper and drain field). Based on a review of current conditions, including utility fees and groundwater concentrations, the system is being optimized to discontinue use of the air stripper and disposal in the drain field. Discontinuation of the air stripper and drain field disposal is the appropriate action because it is cost-effective and will reduce energy use. The life-cycle analysis predicted that converting the system to discontinue use of the air stripper and drain field would have an initial cost of \$36,000, but would result in a \$358,000 savings over the lifetime of system operation due to decreased costs for labor, maintenance, and electricity associated with operation of the system (MWH Americas, Inc. 2011). The estimate included the fee for discharge to the POTW. It was estimated that the cost of implementation would be recovered within 2 years.

Implementation of this change will not impact the effectiveness of the remedy. Furthermore, diversion of groundwater from the drain field was assessed through groundwater flow and transport modeling. The model predicted that the timeframe for remediation would not be impacted by diverting extracted groundwater from the drain field to the POTW (MWH Americas, Inc. 2010).

The option for discharge to the POTW was included in the ROD, and the action will be conducted in compliance with the existing industrial wastewater discharge permit, which regulates the discharge of industrial wastewater from Hill AFB to the North Davis Sewer District sanitary sewer system. Discharge from the on-Base groundwater extraction system to the POTW has a concentration that is less than the maximum allowed (2.13 milligrams per liter [mg/L] for total toxic organics) under the permit discharge limits. Currently, the influent sampling point for the on-Base pump and treat system (U6-906) is sampled monthly for volatile organic compounds. Concentrations of TCE, the contaminant of concern, have steadily declined over the years of system operation and have been below 25 µg/L since 2011 (Figure 3). Other organic compounds have been detected at much lower concentrations (less than 5 µg/L); therefore,



the groundwater flow from the on-Base pump and treat system is well below the limit of 2.13 mg/L (2,130 µg/L) for total toxic organics. Compliance sampling will be conducted in accordance with the discharge permit requirements once the flow of extracted groundwater is diverted to the POTW. The discharge permit will be modified to allow for discharge from OU 6, which is not specifically listed in the current permit.

The change documented in this ESD, as summarized in Table 1, is significant but not fundamental to the remedy selected in the OU 6 ROD. Discontinuing use of the air stripper and drain field by re-routing the discharge to the POTW still provides safe and effective groundwater treatment and does not change the overall approach (pump-and-treat) for groundwater cleanup at Site OT026. The change will not affect the time to achieve cleanup. Implementation of the system reconfiguration to bypass the air stripper and discharge directly to the POTW is anticipated on 1 July 2013. The necessary permit modification will be completed prior to implementation.

## 4.0 Public Participation

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This ESD will be discussed during the November 2013 Restoration Advisory Board (RAB) Meeting. The RAB will be notified of the submission of the finalized ESD at the first quarterly RAB meeting after the ESD is signed. Hill AFB will publish a notice of availability and a brief description of the ESD in the local newspaper, *Ogden Standard Examiner*, the week following that RAB meeting. Hill AFB will also issue a newsletter (Environews) to publicize this ESD.

This ESD will be included in the Administrative Record in the information repository for Hill AFB. The Administrative Record also included the ROD and all documents that formed the basis for selection of the remedial action by USAF with concurrence by EPA and UDEQ. These components meet the public participation requirement set out in Section 300.435(c)(2)(i) of the National Oil and Hazardous Substances Pollution Contingency Plan.

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## 5.0 Agency Comments

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This section will contain support agency comments and USAF responses.

*No significant support agency comments were received.*

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## 6.0 Statutory Determinations

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The Applicable or Relevant and Appropriate Requirements addressed by the ROD for OU 6 are not modified by this ESD. Considering the modifications regarding the selected remedies presented in this ESD, the USAF, EPA, and UDEQ all concur that the remedies at OU 6 remain protective of human health and the environment, comply with federal and state requirements that were identified in the ROD as Applicable or Relevant and Appropriate Requirements, and are cost effective. It is projected that the remediation time frame will not be affected as a result of the adoption of these differences from the ROD. The remedy satisfies CERCLA Section 121.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**




2/19/14

MARTIN HESTMARK  
Assistant Regional Administrator  
Office of Ecosystems Protection and Remediation  
EPA Region 8

Date

**UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY**



AMANDA SMITH  
State of Utah Department of Environmental Quality  
Executive Director

*December 9 2013*  
Date



**AIR FORCE MATERIEL COMMAND  
HILL AIR FORCE BASE, UTAH**



KATHRYN M. KOLBE, Colonel, USAF  
Commander, 75th Air Base Wing

JAN 14 2014

Date

## 7.0 References

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Environmental Resources Program Information Management System (ERPIMS). 2012.

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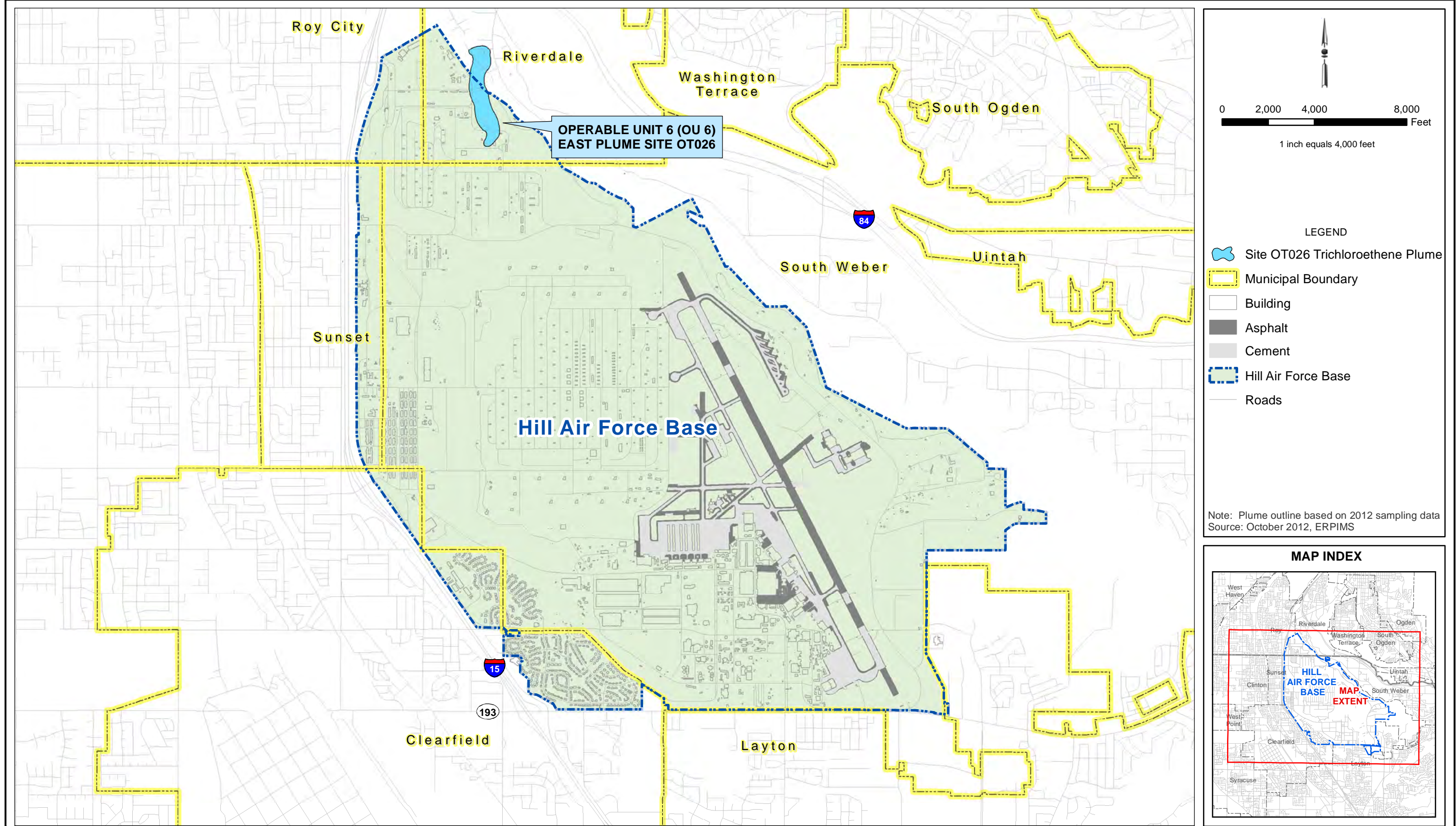
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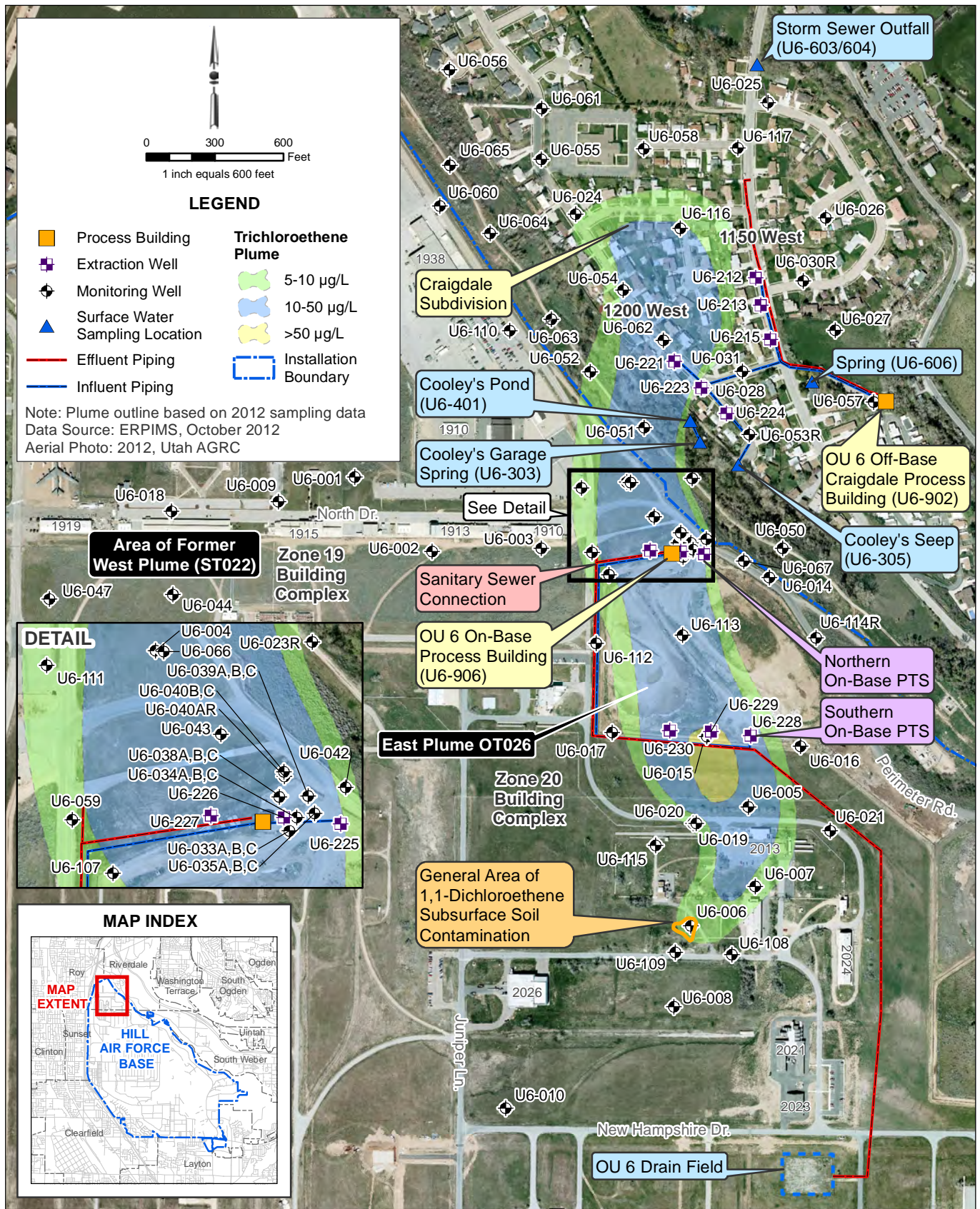


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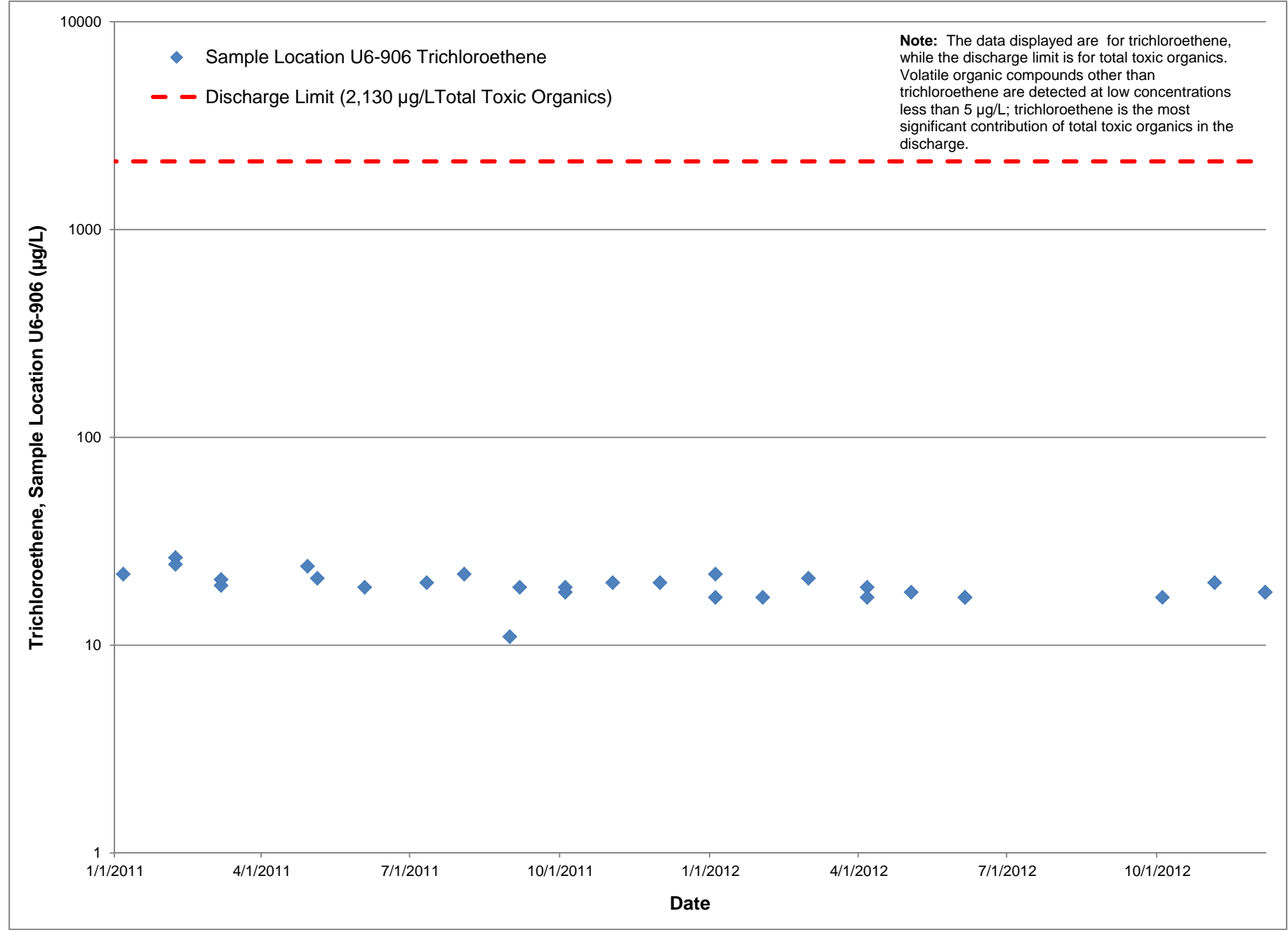






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FIGURE 3  
Discharge Data for the On-Base Pump and Treat System  
*Operable Unit 6 Site OT026, Former Waste Asphalt Pile, Explanation of Significant Differences*



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