



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303-3104

N00204.AR.001434
NAS PENSACOLA
5090.3a

June 18,1997

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding officer,
southern Division, NAVFACENCOM
Attn: Mr. Bill Hill (code 1851)
P.O.Box 190010
North Charleston, South Carolina 29419-9010

SUBJ: Draft Explanation of Significant Differences
Site 39, Operable Unit 12
Naval Air Station Pensacola
EPA Site ID No.: FL9170024567

Dear Mr. Hill:

The U. S. Environmental Protection Agency (EPA), has completed the review of the above subject document, dated March 1997. EPA's comments on the draft version are attached.

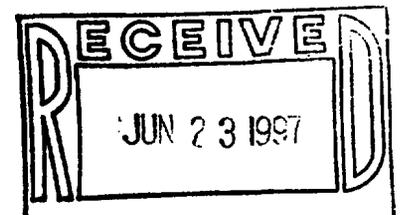
If you have any questions please contact me at (404) 562-8538.

Sincerely,

Gena D. Townsend
Senior Project Manager
Federal Facilities Branch

Attachment

cc: Ron Joyner, NAS Pensacola
Henry Beiro/Brian Caldwell, Ensafe, Pensacola
Allison Dennon, Ensafe, Memphis
John Mitchell, FDEP



Comments

1. The ESD proposes removing the requirement for a five-year review of the no-action alternative. However, the Federal Facilities Agreement, Section 121(c) of CERCLA, and 40 C.F.R. § 300.430(f)(4)(ii) state that, for those remedies resulting in hazardous substances remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less often than every five years. Because there are contaminant levels at Site 39 outside the bounds of the cancer risk level of 10E-4 to 10E-6, and because the ROD indicates a Hazard Index above 1, the ESD should include this information and must explain in more detail why the five-year review is not necessary. [Arsenic is naturally occurring and the detected levels are below the State's drinking water standards]
2. Add a sentence explaining that the evaluation criteria requirements are not applicable because of the "no action" alternative.