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NAS PENSACOLA
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July 9, 1997

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U.S. Environmental Protection Agency
Attn: Ms. Gena Townsend
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

**Re: Final Explanation of Significant Differences
Site 39, NAS Pensacola
Contract # N62467-89-D-0318/083**

Dear Ms. Townsend:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit two copies of the Final Explanation of Significant Differences for Site 39, Oak Grove Campground at the Naval Air Station Pensacola in Pensacola, Florida. Responses to USEPA comments are enclosed. FDEP concurred with the March 1997 version. The document will be submitted to the NAS Pensacola mailing list the week of July 14, 1997.

If you should have any questions or need any additional information regarding the document, please do not hesitate to call me.

Sincerely,

EnSafe/Allen & Hoshall

Allison L. Dennen
Task Order Manager

Enclosure

cc: Bill Hill, Code 1851 SOUTHNAVFACENGCOM without enclosure
Ron Joyner, NAS Pensacola - 2 copies
Denise Klimas, NOM - 1 copy
EnSafe/Allen & Hoshall file - 1 copy
EnSafe/Allen & Hoshall Pensacola - 1 copy
EnSafe/Allen & Hoshall Library - 1 copy
Administrative Record - 1 copy

U.S. Environmental Protection Agency, Region IV
Responses to Comments
Site 39 (Operable Unit 12) Explanation of Significant Differences
Naval Air Station Pensacola

Comment 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.

Response:

Arsenic is naturally occurring and the detected levels are below the USEPA's and Florida's drinking water standards. Aluminum is also naturally occurring.

Comment 2:

Add a sentence explaining that the evaluation criteria **requirements** are not applicable because of the "no action" alternative.

Response:

Agreed. The sentence has been added.