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FINAL EXPLANATION OF SIGNIFICANT DIFFERENCES FOR SITE 1 WITH TRANSMITTAL  
NAS PENSACOLA FL  
9/8/1999  
ENSAFE/ALLEN AND HOSHALL



ENSAFE INC.

ENVIRONMENTAL AND MANAGEMENT CONSULTANTS

5724 Summer Trees Drive • Memphis, Tennessee 38134 • Telephone 901-372-7962 • Facsimile 901-372-2454 • www.ensafe.com

September 8, 1999

Commanding Officer  
Attn: Mr. Bill Hill, Code 1851  
SOUTHNAVFACENGCOM  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

Subject: Delivery of Report  
CTO-083, Proposed Plans and RODs

Reference: Contract # N62467-89-D-0318, CLEAN II

Dear Mr. Hill:

EnSafe Inc. is pleased to submit two copies of the Final Explanation of Significant Differences for Site 1 (Operable Unit 1), Inactive Sanitary Landfill, at the Naval Air Station Pensacola in Pensacola, Florida. Also enclosed is a diskette containing an electronic copy of the document.

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

Sincerely,

EnSafe Inc.

Allison L. Harris  
Task Order Manager

Enclosure: Final Explanation of Significant Differences, Site 1, NAS Pensacola

cc: Ms. Kimberly Reavis, Code 0233KR SOUTHNAVFACENGCOM without enclosure  
EnSafe Inc. CTO 083 file without enclosure  
EnSafe Inc. Knoxville file without enclosure  
EnSafe Inc. Library without enclosure  
EnSafe Inc. file without enclosure

# FINAL DECLARATION OF THE EXPLANATION OF SIGNIFICANT DIFFERENCES

## Site Name and Location

Site 1, Inactive Sanitary Landfill  
Naval Air Station Pensacola  
Pensacola, Florida

## Statement of Basis and Purpose

The U.S. Navy, as the lead agency, has prepared an Explanation of Significant Differences (ESD) for Site 1 (Operable Unit 1) — Inactive Sanitary Landfill, Naval Air Station Pensacola. This ESD is issued under the public participation requirements of Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act, Section 300.435(c)(2)(i) of the National Contingency Plan. The ESD is part of the site's Administrative Record.

The Navy, with concurrence from the United States Environmental Protection Agency (USEPA) and the Florida Department of Environmental Protection (FDEP), selected a remedy that called for discharging treated groundwater into a nearby wetland (as documented in the August 21, 1998 Record of Decision [ROD] for Site 1). Since that time, the Navy has considered and adopted a change to the selected cleanup remedy. The modification was necessary because the Navy's wastewater treatment system is better able to handle daily discharges of low chemical concentrations than an annual discharge of more concentrated chemicals. This change will also increase cost effectiveness while continuing to protect human health and the environment.

## Description of the Selected Remedy and Significant Differences

The original selected remedy for Site 1 involved extracting groundwater downgradient of the landfill, treating it, then discharging the treated water into Wetland 3 on the base. The significant difference in the 1999 modification is the discharge location. Groundwater will not be treated and then discharged into the wetland, but groundwater will be discharged directly into the Navy's wastewater system for treatment. This change will still protect human health and the environment and meets the ARARs identified at the time the original ROD was signed. New ARARs are listed in Table 1. USEPA and FDEP have concurred with the modification to the remedy for Site 1.

Table 1  
New ARARs for the Site 1 Selected Remedy

Action-Specific	Status
Florida Water Quality Based Effluent Limitations Title 62 Chapter 62-650	Relevant and Appropriate
Florida Pretreatment Requirements for Existing and New Sources of Pollution Title 62 Chapter 62-625	Relevant and Appropriate

## Statutory Determinations

Considering the changes that have been made to the selected remedy, the Navy (with USEPA and FDEP concurrence) believes the remedy remains protective of human health and the environment, is cost effective, and complies with federal and state requirements identified in the ROD as applicable or relevant and appropriate to this remedial action at the time the original ROD was signed.



Captain Randal L. Baht  
Commanding Officer  
NAS Pensacola

23 Aug 99  
Date

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Captain Randall L. Bahr  
Commanding Officer  
NAS Pensacola

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