PB99-963119
EPA541-R99-090
1999

EPA Superfund
Explanation of Significant Difference for the Record of Decision:

Pensacola Naval Air Station OU 1
Pensacola, FL
9/23/1999

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 23, 1999

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Commanding Officer
Naval Air Station Pensacola
190 Radford Boulevard
Pensacola, Florida 32508-5217

SUBJ: Explanation of Significant Differences
Operable Unit 1, Site 1
Naval Air Station Pensacola
Pensacola, Florida

Dear Sir:

The U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the above subject decision document and concurs with the explanation of significant differences for the Remedial Action at Site 1. This remedy is supported by the previously completed Remedial Investigation, Feasibility Study and Baseline Risk Assessment Reports.

The significant difference to the August 1998 Record of Decision (ROD) is the discharge location of the groundwater. The groundwater is now being discharged into the Navy's wastewater system where it will undergo treatment. The original selected remedy involved extracting groundwater downgradient of the landfill, treating it, then discharging into Wetland 3 on base.

This action is protective of human health and the environment, complies with Federal and State requirements that are legally applicable or relevant and appropriate to the remedial action and is cost effective.

Sincerely,

Richard D. Green, Director
Waste Management Division

cc: Elsie Munsell, Deputy Assistant Secretary of the Navy
Ron Joynes, NAS Pensacola
[illegible]
[illegible] FDEP

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Richard D. Green, Director
Waste Management Division

cc: Elsie Munsell, Deputy Assistant Secretary of the Navy
Ron Joyner, NAS Pensacola
Bill Hill, SOUTHDIV
Joe Fugitt, FDEP

GDT:gt:FFB:28538:9-14-99:OU1ESD.CON

9/20/99 Townsend | 9/21/99 Marshall | Bozeman 9/23/99 | Johnston

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
[illegible]	[illegible]
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) [illegible] the remedy remains protective of human health and the environment, is [illegible] effective, [illegible] federal and state requirements identified in the ROD as applicable [illegible] relevant and appropriate [illegible] at the time the original ROD was signed.

Captain Randall L. Bal[illegible]
Commanding Officer
NAS Pensacola

23 Aug 99
Date

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