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CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Ms. Allison Drew
Department of Defense Remedial Unit
RCRA & Federal Facilities Branch
United States Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Ms. Drew:

We are in receipt of your April 3, 1992 letter identifying areas in the Federal Facilities Agreement (FFA) to be changed per EPA's request and in accordance with Section XXXI of the FFA.

At this time, we do not believe it is in the best interest of the Navy to make the requested changes. Changing the Baseline Risk Assessment Report from a secondary document to a primary document **requires** coordination within the Department of the Navy as well as with the State Agencies (i.e., Florida Department of Environmental Regulation (FDER) and Georgia Environmental Protection Division (GEPD) and others). The requested changes impact not only the Naval Air Station Pensacola, Florida FFA, but other Florida and non-Florida National Priority Listed Sites FFAs as well as those other activities with Hazardous Ranking Scores II (HRS-II) high enough to be placed on the NPL with FFAs.

Concerning 40 CFR 300.430 (d) (4) which states that "the lead agency" (the Navy) "shall conduct a site-specific baseline risk assessment to characterize the current and potential threats to human health and the environment...", and the function of the RI is to provide the information needed to "assess (these) risks... and to support the development, evaluation and selection of appropriate response alternatives (i.e., the Feasibility Study (FS))" (40 CFR 300.430(d)(1), these quoted regulations do not specify that the Baseline Risk Assessment Report is a primary document.

We have received a January 8, 1992 comment on the *SMP* from EPA which states "whenever the Baseline Risk Assessment is submitted separately rather than with the RI report then it is a primary document. We are concerned that EPA did not review our response to this comment.

Please contact Ms. Suzanne O. Sanborn at (803) 743-0574, if you should have any questions or concerns regarding these issues.

Sincerely,

SIDNEY L. ALLISON, P.E.
DIRECTOR
ENVIRONMENTAL DIVISION

copy to:
NAS Pensacola (Mr. Ron Joyner)
FDER (Mr. Eric Nuzie)

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