

EXPLANATION OF SIGNIFICANT DIFFERENCES

Area of Concern Sites

DP-13, Building 255 Drywells
DP-15, Building 219 Drywell
DP-22, Building 222 Battery Acid Disposal Pit
SD-50, Building 214 Vehicle Maintenance Shop

Former Griffiss AFB
Rome, New York

Site Name: Former Griffiss AFB

Site Location: Rome, New York

Lead Agency: Department of the Air Force

Supporting Agencies: United States Environmental Protection Agency, Region II (USEPA)

New York State Department of Environmental Conservation (NYSDEC)

New York State Department of Health (NYSDOH)

I. Statement of Purpose

The Records of Decision (RODs) for the final remedy for the soils at the Area of Concern (AOC) sites DP-13 and DP-22 were signed on September 27, 2001. The RODs for the final remedy for soils at the AOC sites DP-15 and SD-50 were signed on September 30, 1999. All four (4) AOC sites are located within the Tin City Operable Unit at the former Griffiss AFB. At these AOC sites, the selected remedies were for No Further Action for the Soils with Industrial/Commercial Land Use Restrictions and with the requirement that the groundwater will be further evaluated as part of the On-Base Groundwater AOC (SD-52) Tin City Operable Unit. This Explanation of Significant Differences (ESD) is issued in accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA), and Section 300.435(c)(2)(i) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This ESD has been prepared to provide the public with an explanation of the nature of the change which has been made to the selected remedy set forth in the RODs for these AOC sites; to summarize the information that led to the making of this change; and to affirm that the revised remedy complies with the statutory requirements of CERCLA Section 121, 42 U.S.C. § 9621. The proposed action, involving the removal of the need for further evaluation of the groundwater under the On-Base Groundwater AOC (SD-52) Tin City Operable Unit (includes AOC sites DP-13, DP-15, DP-22, and SD-50), is based upon the completion of a groundwater evaluation that was performed from September 2001 to September 2002 (5 quarters) under the On-Base Groundwater AOC (SD-52) Long-Term Monitoring Program. The results indicate that NYSDEC Class GA Groundwater

Standards, which are considered Applicable or Relevant and Appropriate Requirements (ARARs) for groundwater, have been met. Since this proposed action does not fundamentally alter the primary remedy or performance of the remedy, a ROD amendment is not required. The September 2001 to September 2002 groundwater investigations and this ESD will be incorporated into the Administrative Record for AOC sites DP-13, DP-15, DP-22 and SD-50, in accordance with Section 300.825(a)(2) of the NCP.

II. Summary of Site History, Site Conditions and Selected Remedy

1. DP-13 - The Building 255 Drywell Area of Concern (AOC) (site identification designation DP-13) is located at the former Griffiss Air Force Base (AFB) in Rome, Oneida County, New York. The former Building 255 was located in the west-central portion of the base in an industrial complex referred to informally as "Tin City". This building was used as a Vehicle Maintenance Facility. The former Building 255 (along with Building 230) was demolished in 1997-1998 during the reconstruction of Hangar Road. The suspected drywells associated with this site included several near the former location of Building 255 and other nearby buildings, including Buildings 215/216, 222, 223, and the location of former Building 230. Two suspected drywells, which were reportedly located near the former Building 255 location, were reportedly stone- and gravel-filled pits measuring approximately 3 feet square by 10 feet deep. The exact location of these two drywells was not known; although they were suspected (but never found) in an area on the east side of the building in the grassed area across Langley Road. A third drywell was located during a site reconnaissance on the west side of the former Building 255 location, beneath a manhole cover in the paved parking lot. The third drywell reportedly received liquid wastes from floor drains located within the Vehicle Maintenance Shop and possibly a small glass repair shop located within the former Building 255 location. All floor drains located within the former Building 255 were sealed prior to the demolition of the building. The quantity of wastes disposed by these facilities was estimated at less than 5 gallons per day. Wastes reportedly disposed included lube oil, engine cleaning compounds, caustics, acids, and paint. Pesticide rinse water, solvents, and other waste liquids generated in small quantities by activities in Buildings 215/216, 222, 223, 230 and 255 may also have been disposed in the west side Building 255 drywell. This drywell reportedly operated from an unknown date (possibly the 1940s) until the early 1970s. This site is located on an area of the base that is topographically level, with less than 2 feet of relief occurring in the surrounding area and is not located near major natural surface water drainage features. Runoff from the site is channeled into the base storm drain system, which discharges to the New York State Barge Canal via Three Mile Creek. Groundwater flow is toward the south-southeast.

In 1994, a Remedial Investigation (RI) was performed (Law 1996). The main objective of the RI was to investigate the nature and extent of environmental contamination from historical releases at the AOC in order to determine whether any remedial action was necessary to prevent potential threats to human health and the environment. Eight temporary monitoring wells were installed in August 1994 to collect grab groundwater samples. Six additional temporary wells were installed in April 1995 to collect additional grab groundwater samples for analysis of specific compounds. A total of 10 samples were collected. Analysis of the grab groundwater samples indicated the presence of 22 volatile organic compounds (VOCs), 20 semivolatile organic compounds (SVOCs), 34 pesticides, two PCBs, 26 metals, total glycols, cyanide, and petroleum hydrocarbons. The concentrations of 12 VOCs, six SVOCs, two pesticides, one PCB, 18 metals, and petroleum hydrocarbons that were detected and exceeded the most stringent criteria for groundwater are shown in Table 1.

Table 1
1994 RI Groundwater Data Summary

Compound	Most Stringent Criterion *	Frequency of Detection above Most Stringent	Range of Concentrations
Metals (mg/l)			
Aluminum	0.05	8/8	5.22 - 1,420
Antimony	0.003	1/7	ND - 0.0115
Arsenic	0.025	5/8	0.0041J - 0.19
Barium	1	1/8	0.039 - 8.19
Beryllium	0.003	5/8	0.00173J - 0.0592
Cadmium	0.005	2/8	0.058J - 0.149
Chromium, Total	0.05	5/8	0.0133J - 4.87
Copper	0.2	6/8	0.055 - 9.43
Iron	0.3	4/8	147 - 3,940
Lead	0.015	8/8	0.0196 - 4.68
Manganese	0.05	8/8	0.693 - 293
Mercury	0.0007	1/8	0.00005J - 0.00351J
Nickel	0.1	4/8	0.0186J - 2.48
Selenium	0.01	4/8	0.00083J - 0.115
Silver	0.05	2/8	0.0062J - 0.161J
Thallium	0.0005	2/8	0.0044J - 0.0054
Zinc	2	6/8	0.095 - 15.1
Volatiles (ug/l)			
1,2-Dichloroethane	0.4	2/8	ND - 4
1,2,5-Trimethylbenzene	5	1/8	ND - 190D
Benzene	1	1/8	0.2J - 3
Ethylbenzene	5	1/8	ND - 26
Isopropylbenzene	5	1/8	ND - 15
m,p-Xylene	5	1/8	ND - 160D
Naphthalene	10	1/8	ND - 83D
o-Xylene	5	1/8	ND - 87D
SEC-butylbenzene	5	1/8	ND - 13
Toluene	5	1/8	0.1J - 780D
Trichloroethylene	5	3/8	0.1J - 7.7
Cis-1,2-Dichloroethylene	5	1/8	ND - 96D
SVOCs (ug/l)			
Benzo(a)anthracene	0.002	4/9	0.06J - 0.9J
Benzo(a)pyrene	0.002	4/9	0.06J - 0.9J
Benzo(a)fluoranthene	0.002	4/9	0.1J - 1J
Benzo(k)fluoranthene	0.002	3/8	0.2JU - 0.3J
Chrysene	0.002	4/9	0.06J - 1J
Indeno(1,2,3-cd)pyrene	0.002	1/8	ND - 0.5J
Pesticides (ug/l)			
Aldrin	0.002	1/9	0.001J - 0.004
Dieldrin	0.004	1/8	0.001J - 0.013J
PCB-1260 (Aroclor 1260)	0.1J	1/8	ND - 0.6J
Wet Chemistry			
Petroleum Hydrocarbons	0.1	8/8	0.11J - 28

* NYSDEC Class GA Groundwater Standards

A RI supplemental investigation was performed in 1997 in the Tin City area, which includes the Building 255 Drywell AOC. This investigation included the installation and sampling of two new wells at Building 255. Low levels of chloroform and trichloroethylene were detected in one of the wells, but the concentrations did not exceed the NYSDEC groundwater guidance values.

In 1998, based upon the RI and baseline risk assessment, an interim remedial action was performed to remove contaminated subsurface soil at the drywell located west of the former site of Building 255.

A ROD for the final remedy for the soils at this AOC site was signed on September 27, 2001. The selected remedy for DP-13 was for No Further Action for the Soils with Industrial/Commercial Land Use Restrictions. The ROD also required that groundwater be further evaluated as part of the On-Base Groundwater AOC (SD-52) Tin City Operable Unit.

From September 2001 to September 2002, additional groundwater sampling and analysis was performed for the Tin City Operable Unit under the On-Base Groundwater AOC (SD-52). The results from this Long-Term Monitoring Program are further discussed in Section III, Basis for this Document.

2. DP-15 - The Building 219 AOC (site identification designation DP-15) is located at the former Griffiss AFB. Building 219, the Electric Power Production Shop, is also located in "Tin City". Based on interviews with base personnel, a suspected drywell was reportedly located south of Building 219 in what is now an asphalt parking lot. The actual location of the drywell has not been determined. The suspected drywell was reportedly a 4-foot-square by 10-foot-deep pit filled with stone and gravel and was reportedly used to dispose of liquid wastes. Fuel spills have also been reported at this site. The suspected drywell reportedly operated from an unknown date (possibly the 1940s) until the early 1970s, with the disposal of less than 1 gallon per day of neutralized battery acid, less than 1 gallon per day of ethylene glycol, and less than 1 gallon per month of shop floor washwater.

In 1994, an RI was performed (Law 1996). The main objective of the RI was to investigate the nature and extent of environmental contamination from historical releases at the AOC in order to determine whether any remedial action was necessary to prevent potential threats to human health and the environment. In 1993 and 1994, during the RI, a surface geophysical survey was performed, and one test pit was excavated in an attempt to locate the drywell. Neither the drywell nor any discharge points were detected by the survey, and they were not discovered during excavation. In 1994, one grab groundwater sample was collected from the temporary monitoring well installed in the soil boring. In 1995, a second grab groundwater sample was collected and analyzed for SVOCs (the laboratory had failed to analyze for SVOCs in the first sample). One VOC (trichloroethylene), three SVOCs (acenaphthylene, anthracene, and di-n-butylphthalate), five pesticides, sixteen metals, total glycols, and petroleum hydrocarbons were detected in the grab groundwater sample. None of the VOCs, SVOCs, or pesticide concentrations exceeded the screening levels. Five of the sixteen metals exceeded the standards or guidance values (aluminum, iron, manganese, sodium, and thallium). The concentration of total glycols (0.44 mg/L) in the grab groundwater sample exceeded the New York State Groundwater Standard of 0.05 mg/L. Based on historical information, the presence of glycols does not appear to be related to drywell usage, but it was investigated under a separate RI AOC. Petroleum hydrocarbons were detected at a concentration of 0.3 mg/L which slightly exceeds the New York State Groundwater Standard for unspecified organic compounds (0.1 mg/L). The compounds

that were detected and exceeded the most stringent criteria for groundwater are shown in Table 2.

Table 2
1994 RI Groundwater Data Summary

Compound	Most Stringent Criterion*	Frequency of Detection above Most Stringent	Range of Concentrations
Metals (mg/l)			
Aluminum	0.05	1/1	3.25
Iron	0.3	1/1	9.06
Manganese	0.05	1/1	14.2
Sodium	20	1/1	21.2
Thallium	0.0005	1/1	0.002J
Glycols (ug/l)			
Total Glycols	0.05	1/1	0.44
Wet Chemistry			
Petroleum Hydrocarbons	0.1	1/1	0.3

* NYSDEC Class GA Groundwater Standards

A ROD for the final remedy for the soils at this AOC site was signed on September 30, 1999. The selected remedy for DP-15 was for No Further Action for the Soils with Industrial/Commercial Land Use Restrictions. The ROD also required that groundwater be further evaluated as part of the On-Base Groundwater AOC (SD-52) Tin City Operable Unit.

From September 2001 to September 2002, additional groundwater sampling and analysis was performed for the Tin City Operable Unit under the On-Base Groundwater AOC (SD-52). The results from this Long-Term Monitoring Program are further discussed in Section III, Basis for this Document.

3. DP-22 - The Building 222 AOC (site identification designation DP-22) is located at the former Griffiss AFB. Building 222 is also located in "Tin City" and was the former truck maintenance facility and entomology laboratory. A battery acid disposal pit (BADP) was located inside Building 222 in the truck bay area (north central portion of the building). The pit was an opening approximately 2 square feet in the concrete floor that was covered with a steel grate. Baking soda-neutralized battery acids were discharged into the BADP from the 1940s to 1984.

In 1994, an RI was performed (Law 1996). The main objective of the RI was to investigate the nature and extent of environmental contamination from historical releases at the AOC in order to determine whether any remedial action was necessary to prevent potential threats to human health and the environment. Analysis of the grab groundwater samples indicated the presence of one volatile organic compound, five semivolatile organic compounds, and 20 metals. Cyanide was also detected in the groundwater at Building 222 but did not exceed the most stringent criteria for groundwater or twice the detected background concentration. The sample was also analyzed for PCBs and none were detected. The concentrations of compounds that were detected and exceed the most stringent criteria for groundwater are shown in Table 3.

Table 3
1994 RI Groundwater Data Summary

Compound	Most Stringent Criterion*	Frequency of Detection above Most Stringent	Range of Concentrations
Metals (mg/l)			
Aluminum	0.05	1/1	162
Arsenic	0.025	1/1	0.07
Beryllium	0.003	1/1	0.008
Cadmium	0.005	1/1	0.052
Chromium, Total	0.05	1/1	0.28
Copper	0.2	1/1	0.9
Iron	0.3	1/1	420
Lead	0.015	1/1	0.096
Manganese	0.05	1/1	24.9
Nickel	0.1	1/1	0.58
Sodium	20	1/1	56.3
Zinc	2	1/1	4.1

* NYSDEC Class GA Groundwater Standards

In 1998, based upon the RI and baseline risk assessment, an interim remedial action was performed to remove contaminated subsurface soil at the drywell located in the truck bay area of Building 222.

A ROD for the final remedy for the soils at this AOC site was signed on September 27, 2001. The selected remedy for DP-22 was for No Further Action for the Soils with Industrial/Commercial Land Use Restrictions. The ROD also required that groundwater be further evaluated as part of the On-Base Groundwater AOC (SD-52) Tin City Operable Unit.

From September 2001 to September 2002, additional groundwater sampling and analysis was performed for the Tin City Operable Unit under the On-Base Groundwater AOC (SD-52). The results from this Long-Term Monitoring Program are further discussed in Section III, Basis for this Document.

4. SD-50 - The Building 214 AOC (site identification designation SD-50) is located at the former Griffiss AFB. The Building 214 AOC, also located in "Tin City", consists of Building 214, an underground storage tank (UST), parking areas, and two suspected drywells. Building 214, a former vehicle maintenance shop, covers approximately 3,000 square feet of the site. Grass-covered areas line the east and west sides of the building, an asphalt parking area is to the north, and a gravel-covered parking area is to the south. Solvent and petroleum product releases have been reported in the gravel-covered parking area. Two suspected drywells have also been reported to exist at this AOC, one located outside the southeast corner and the other outside the southwest corner of the building. The historical and operational uses of these suspected drywells are unknown. The floor drain system in Building 214 is connected to an oil/water separator system located in the southeastern portion of the building. The water discharges to the sanitary sewer system, and the oils are directed to a 275-gallon UST located outside of the southeast corner of the building. This UST has reportedly overflowed in the past because of a mechanical failure of the tank gauge.

In 1994, an RI was performed (Law 1996). The main objective of the RI was to investigate the nature

and extent of environmental contamination from historical releases at the AOC in order to determine whether any remedial action was necessary to prevent potential threats to human health and the environment. Geophysical investigations performed during the RI were unable to locate the suspected drywells. Two grab groundwater samples were collected from the temporary wells installed near the suspected drywell locations. Both samples contained VOCs, SVOCs, petroleum hydrocarbons, and pesticides; most concentrations were below the guidance values. One SVOC and two pesticides were detected at concentrations above the most stringent criteria in one of two samples. Five metals were detected above the guidance values. Petroleum hydrocarbons were detected at a concentration of 3.9 mg/L which exceeds the most stringent criteria for groundwater for unspecified organic compounds (0.1 mg/L). The compounds that were detected and exceeded the most stringent criteria for groundwater are shown in Table 4.

Table 4
1994 RI Groundwater Data Summary

Compound	Most Stringent Criterion*	Frequency of Detection above Most Stringent	Range of Concentrations
Metals (mg/l)			
Aluminum	0.05	2/2	5.96 - 9.22
Lead	0.015	1/2	ND - 0.0171
Manganese	0.05	2/2	0.905 - 1.38
Sodium	20	1/2	ND - 24.7
Thallium	0.0005	1/2	ND - 0.0006J
SVOCs (ug/l)			
Bis(2-ethylhexyl)phthalate	6	1/2	5J - 6J
Pesticides (ug/l)			
3,5-dimethyl-4-methylthio)	5	1/2	ND - 13
Aldrin	ND	1/2	0.002J - 0.014J
Wet Chemistry			
Petroleum Hydrocarbons	0.1	2/2	3.9

* NYSDEC Class GA Groundwater Standards

The oil/water separator and associated UST were removed in June 1997. The excavation walls, floor, and excavated soil pile were sampled, and no petroleum constituents were encountered above NYSDEC regulations.

A ROD for the final remedy for the soils at this AOC site was signed on September 30, 1999. The selected remedy for SD-50 was for No Further Action for the Soils with Industrial/Commercial Land Use Restrictions. The ROD also required that groundwater be further evaluated as part of the On-Base Groundwater AOC (SD-52) Tin City Operable Unit.

From September 2001 to September 2002, additional groundwater sampling and analysis was performed for the Tin City Operable Unit under the On-Base Groundwater AOC (SD-52). The results from this Long-Term Monitoring Program are further discussed in Section III, Basis for this Document.

III. Basis for the Document

The selected alternative as stated in the RODs for these sites is for No Further Action for the Soils with Industrial/Commercial Land Use Restrictions and with the requirement that the groundwater will be further evaluated as part of the On-Base Groundwater AOC (SD-52) Tin City Operable Unit. This determination was based upon information presented in the draft RI report dated December 1996 and the Closure Certification Report for Interim Remedial Actions at Building 20, 112, 222 and 255 dated March 2001. Subsequent to the execution of the RODs, groundwater monitoring was initiated under the On-Base Groundwater (SD-52) Long-Term Monitoring Program for the "Tin City" Operable Unit which encompassed these sites. Groundwater sampling and analysis was performed during the period September 2001 to September 2002 (5 sample rounds). VOC, SVOCs (AFCEE QAPP 3.1 List for VOCs & SVOCs) and metals analysis was performed in the March 2002 sample round and target VOCs (i.e., the chlorinated ethenes and chloroform) were analyzed in the four other sampling rounds. Four monitoring wells were sampled during all five events and two additional monitoring wells were sampled during the September 2001 and March 2002 event. Exceedances were only reported in the third (March 2002) sampling round and only for iron and sodium. The iron exceedances are indicative of background conditions, because iron exceedances have been reported in many sampling locations throughout the Base. The sodium exceedances reported in the same sampling event (March 2002) is most likely attributed to infiltration of road salt use during the winter. Therefore, the concentrations of both metals are not considered to be compounds of concern. Target VOC detections were reported in five of the six sampling locations, but none exceeded their respective Groundwater Standards. No other VOCs (AFCEE Quality Assurance Project Plan, 3.1 List for VOC analysis) were detected in any of the monitoring wells sampled in March 2002. SVOCs were also not detected in any of the sample locations during the March 2002 sample round. The groundwater sampling methodology and analytical results are presented in the final *Tin City Area of Concern, Long-Term Monitoring Program, Annual Groundwater Monitoring Report* dated August 2003 and the compounds that were detected and exceeded the most stringent criteria for groundwater are summarized in Table 5.

Table 5
2001 - 2002 "Tin City" Operable Unit Groundwater Data Summary

Compound	Most Stringent Criterion*	Frequency of Detection above Most Stringent Criterion				Range of Concentrations
		September 2001	December 2001	March 2002	June 2002	
Metals (mg/l)						
Aluminum	--	N/A	N/A	0/6	N/A	0.0807F - 2.59
Antimony	0.003	N/A	N/A	0/6	N/A	ND
Arsenic	0.025	N/A	N/A	0/6	N/A	ND
Barium	1	N/A	N/A	0/6	N/A	0.0105 - 0.126
Beryllium	0.003	N/A	N/A	0/6	N/A	ND
Cadmium	0.005	N/A	N/A	0/6	N/A	ND - 0.0016
Calcium	--	N/A	N/A	0/6	N/A	43.2B - 62.9B
Chromium, Total	0.05	N/A	N/A	0/6	N/A	ND - 0.0021F
Copper	0.2	N/A	N/A	0/6	N/A	ND
Iron	0.3	N/A	N/A	5/6	N/A	0.101 - 4.09
Lead	0.015	N/A	N/A	0/6	N/A	ND
Magnesium	35	N/A	N/A	0/6	N/A	3.67 - 21.8
Manganese	0.03	N/A	N/A	0/6	N/A	0.0088 - 0.283
Mercury	0.0007	N/A	N/A	0/6	N/A	ND
Nickel	0.1	N/A	N/A	0/6	N/A	ND
Potassium	--	N/A	N/A	0/6	N/A	1.02 - 6.56
Selenium	0.01	N/A	N/A	0/6	N/A	ND
Silver	0.05	N/A	N/A	0/6	N/A	ND
Sodium	20	N/A	N/A	5/6	N/A	5.07 - 52.8
Thallium	0.0005	N/A	N/A	0/6	N/A	ND
Vanadium	--	N/A	N/A	0/6	N/A	ND - 0.0041F
Zinc	2	N/A	N/A	0/6	N/A	ND - 0.0136F
Volatiles (ug/l)						
Toluene	5	N/A	N/A	0/6	N/A	ND - 0.49F
Trichloroethylene	5	0/6	0/6	0/6	0/6	ND - 4.3
Cis-1,2-Dichloroethylene	5	0/6	0/6	0/6	0/6	ND - 3.2
Chloroform	7	0/6	0/6	0/6	0/6	ND - 5.4
SVOCs (ug/l)						
No SVOCs were detected		N/A	N/A	0/6	N/A	ND

* **NYSDEC Class GA Groundwater Standards**

B - Result is a positive value; however, analyte was detected in associated blank at concentration above the Reporting Limit (RL)

F - Analyte was detected above the Method Detection Limit (MDL), but below the RL

IV. Description of Significant Differences

The Air Force proposes to delete the requirement in the RODs for AOC sites DP-13, DP-15, DP-22 and SD-50 that groundwater be further evaluated as part of the On-Base Groundwater AOC (SD-52) Tin City Operable Unit. This proposal is based upon the completion of a groundwater evaluation that was performed from September 2001 to September 2002 (5 quarters) under the On-Base Groundwater AOC (SD-52) Long-Term Monitoring Program which indicates that ARARs for groundwater (NYSDEC Class GA Groundwater Standards) have been met. This information is presented in the draft *Tin City Area of Concern, Long-Term Monitoring Program, Annual Groundwater Monitoring Report* dated May 2003. The USEPA provided their concurrence by correspondence dated July 15, 2003 and a final report was issued on August 18, 2003.

1. Performance: Based upon the analytical results stated in the May 2003 report, it has been demonstrated that groundwater ARARs have been met.
2. Timing: As documented by this ESD, groundwater ARARs have been met for this operable unit.
3. Costs: Since no further evaluation of groundwater is recommended by this ESD, there are no costs associated with this recommendation.

V. Public Participation

This ESD and the information upon which it is based will be included in the Administrative Record for the subject AOC sites. The Administrative Record also includes the final RODs and all documents that formed the basis for the Air Force's selection of the final remedy for AOC sites DP-13, DP-15, DP-22 and SD-50. The Administrative Record is available for public review at the location listed below:

AFRPA/DA-Griffiss
Griffiss Business and Technology Park
153 Brooks Road
Rome, NY 13441-4105
(315) 330-2275

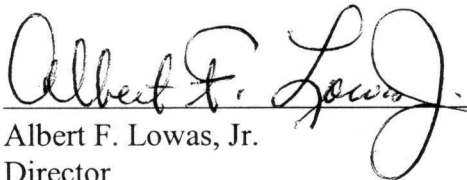
or, in the Information Repository located at:

Jervis Public Library
613 North Washington Street
Rome, NY 13440
(315) 336-4570

A notice summarizing this ESD will be placed in the Rome Daily Sentinel in accordance with the NCP § 300.435 (c)(2)(i).

VI. Support Agency Review

The Department of the Air Force has determined that the remedy outlined in the final RODs for AOC sites DP-13, DP-15, DP-22 and SD-50 remains protective of human health and the environment. Despite the removal of the requirement that groundwater be further evaluated as part of the On-Base Groundwater AOC (SD-52) Tin City Operable Unit, these RODs will remain protective of human health and the environment because the results of the September 2001 to September 2002 sampling demonstrate that groundwater ARARs have been met.




Albert F. Lowas, Jr.

Director

Air Force Real Property Agency



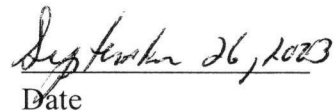
Date



Jane M. Kenny

Regional Administrator

United States Environmental Protection Agency, Region 2



Date