



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

July 23, 2007

Reply to
Attn Of: ECL-117

Mr. Jim Brown
Department of the Navy
Naval Facilities Engineering Command Northwest
1101 Tautog Circle
Silverdale, WA 98315-1101

Re: EPA Concurrence with Second Five Year Review,
Former Naval Complex, Adak, Alaska, December 13, 2006

Dear Mr. Brown:

EPA has reviewed the Second Five Year Review for the Former Naval Complex, Adak, Alaska (Adak), which was signed by the U.S. Navy (Navy) on December 13, 2006. EPA is encouraged by the progress the Navy has made in implementing the recommendations set forth in previous Five Year Reviews and acknowledges the efforts of the Federal Facility Agreement project team. This Five Year Review covers all Operable Units at Adak (OU A, OU B-1, and OU B-2).

EPA reviewed the document for technical adequacy, accuracy, and consistency with EPA guidance. The document provides a generally clear summary of the status of individual sites. It also identifies a number of actions to be taken that affect the protectiveness of the selected remedies and documents a schedule for completion of the recommended actions.

Based on EPA's review of the 2006 Second Five Year Review and other knowledge and documents regarding the site and remedies, and consistent with EPA's "Comprehensive Five Year Review Guidance, July 2001, EPA has identified some concerns in interpretation of cleanup or screening values and ARARs. These findings can be found in the attached comments and Issues Identified Table. EPA's independent Protectiveness Determination is also attached to this letter. In general EPA concurs with the Navy's determinations that the selected remedies for OU A and OU B-1 will be protective so long as the Remedial Actions are completed as planned and the follow up actions identified by the Navy and EPA are addressed in a timely manner.

EPA looks forward to working with the Navy and the Alaska Department of Environmental Conservation on implementing the recommended actions in the five year review report and in EPA's findings.

The next statutory five year review will be done no later than five years from receipt of this concurrence letter. If you have questions concerning this letter, please call me at 206/553-1855, or contact EPA's site manager for this review, Christopher Cora, at 206/553-1478 (email: cora.christopher@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel D. Opalski".

Daniel D. Opalski, Director
Office of Environmental Cleanup

Enclosures

cc: Jennifer Roberts, ADEC
Marcia Combes, Alaska Operations Office
Greg Siekaniec, USDOJ

Sincerely,

Daniel D. Opalski, Director
Office of Environmental Cleanup

Enclosures

cc: Jennifer Roberts, ADEC
Marcia Combes, Alaska Operations Office
Greg Siekaniec, USDOJ

Concurrence

Name	C. Cora	D. Yamamoto	T. Brincefield
Date			
Initial			

Region 10 Former Naval Complex, Adak, Alaska Second Five Year Review
 Summary of EPA's Protectiveness Determinations
 February 2007

OU	Protectiveness Determination	Protectiveness Statement
OU A Sites 178 Sites, 9 Sites require follow up	Will be protective	Remediation of the OU A sites is in progress and is expected to be protective of human health and the environment upon completion. Remediation and construction are being done in accordance with the requirements of the decision documents and design specifications included in the respective RD/RA work plans. In the interim, exposure pathways that could result in unacceptable risks are being controlled and reinforced with the implementation of ICs. The following sites are not complete and may require additional actions: ASR-8 Facility, SA 77 Small Drum Storage Area, NMCB Building T-1416 Expanded Area, South of Runway 18-36 Area, SWMU-17 Power Plant 3, SWMU 62 New Housing Fuel Leak, SA-88 P-70 Energy Generator UST 10578, NORPAC Hill Seep Area, SWMU 61 Tank Farm B.
OU B-1 156 Unexploded Ordnance Sites	Will be Protective	Remediation of the OU B-1 sites is in progress and is expected to be protective of human health and the environment upon completion of the Selected Remedy. Remediation and construction were done at most sites in accordance with the requirements of the decision documents and design specifications included in the respective RD/RA work plans. 16 Sites are under review. In the interim, exposure pathways that could result in unacceptable risks are being controlled and reinforced with the implementation of ICs.
OU B-2 38 Unexploded Ordnance Sites	NA - RI/FS underway	A protectiveness determination cannot be made until the RI/FS is complete and the final remedy for the OU B-2 Sites is selected. In the interim, exposure pathways that could result in unacceptable risks to humans are being controlled through voluntary ICs and Engineering Controls. Continued evaluation and improvements to ICs to prevent unauthorized access to OU B-2 is required.

Table 2 EPA's Addendum to U.S. Navy's Table 8-1
 Issues Identified in the Former NAC Adak Second Five Year Review
 February 2006

Issues	Affects Protectiveness (Y/N)		Recommendations/Follow-up Actions	Anticipated Completion Date	Follow-up Actions Affect Protectiveness (Y/N)	
	Current	Future			Current	Future
OU A						
The presence of volatile organics compounds in downtown aquifer assoc. w/ SWMU 11 and 14	No	Yes	Continue annual monitoring to track concentrations of VOC in the aquifer and their concentration trend. Maintain institutional controls.	Annually until next 5 Year Review	No	Yes
Presence of groundwater contaminants other than COCs identified in ROD which exceed MCLs	No	Yes	Continue annual monitoring to determine if concentrations of non-COCs reflect an unknown source. Evaluate protectiveness of remedy for surface water and groundwater remedies.	Annually until next 5 Year Review	No	Yes
Institutional Controls, downtown dig notification program	Yes	Yes	Enhance procedures and oversight for notification and approval of subsurface activities in areas with potential subsurface contamination	2008	Yes	Yes
Sediment screening values unavailable for Alaska	Yes	Yes	When Alaska specific sediment screening values for contaminants are unavailable, use NOAA or Washington State Screening Tables	Annually until next 5 Year Review	Yes	Yes
OU B - 1 and B - 2						
Trespassing on Naval property contaminated with unexploded ordnance	Yes	Yes	Install and monitor additional access restrictions to prevent unauthorized access to Parcel 4	2007 (Navy has installed or repaired gates)	Yes	Yes

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Navy ceased remedial action at three OU B-1 sites in 2004, unexploded ordnance remains on the surface and in the subsurface.	Yes	Yes	Complete the selected remedy for the remaining sites on Mount Moffett. Institute enhanced institutional controls to prevent access to area until remedy is completed.	2010	Yes	Yes
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