



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

These comments are in response to the Navy's responses to EPA's comments on the April 14, 2006 Draft Second Five Year Review. EPA requests these comments be included with the Final document as an addendum, without revising the Final Document.

General Comments:

1. The Navy has addressed the majority of EPA's comments and the revisions are acceptable with a few remaining concerns. Overall the document is easier to read and satisfies the intent of five year reviews.
2. There are numerous instances where Practicable Quantitation Limits (PQL) are above the cleanup levels, MCLs in this case. This may be due to interference, but should be addressed in the Comprehensive Monitoring Plan. This is especially relevant for VOC analysis. For example: The discussion on SWMU 14 indicates that the PQL in 2003 was above the cleanup level for several contaminants of concern (COC) TCE, 1,1-DCE, and vinyl chloride. MCLs for these COCs are 5ug/L, 7ug/L, and 2ug/L respectively. Analytical procedures should be reviewed because the target PQL for all these contaminants is 1ug/L [OAC Rule 3745-27-10(C)(7)(e)]. There are other examples of this. A recommended action would be to evaluate the analytical procedures to ensure that the method is capable of measuring to at least the cleanup level. It would also benefit to know what the PQLs were in 2003, and other years when it was greater than the MCL, to evaluate the potential range of exceedance. Developing a trend analysis is necessary to determine whether the COCs are decreasing or if there are other sources.
3. ARARs discussion in Section 7.0, page 7-7 does not capture the purpose of evaluating site data for comparison with ARARs. ARARs are fixed at the ROD and do not change. If a standard within a regulation changes then the effect of that change is evaluated. If it is determined that the standard used in the remedy selection is no longer protective then a possible change in the cleanup levels would be documented through change in the remedy document (explanation of significant difference, for example). This would apply to non-contaminants of concern or contaminants of concern. The Five Year Review should evaluate any changes in standards which could apply to contaminants identified at a site. It is incorrect to not evaluate these changes, as stated on page 7-7. Overall, the ARAR has not changed, ie: the Clean Water Act, but a standard within it has.
4. The Navy's response to EPA's specific comment # 3 regarding the appropriateness of specifying the "nine most important sites in OU A" versus not specifically mentioning the OU B sites states that: the revised FYR would specifically mention the seven OU B-1 sites mentioned in the paragraph. The revised FYR only mentions four sites. What happened with the remaining three?

5. Page 7-8, 1st paragraph under **Sediment** contradicts the second sentence in the second paragraph. The first paragraph says that PCBs were the only COC identified for sediments. The second sentence in the next paragraph states there were no COCs or RGs established in the ROD.
6. Page 7-8, 2nd paragraph under **Sediment** discussing the risk based values presented in Table 7-3 states that the values are generic, not site specific. If site specific values were used in the RI, than they should be used for future evaluations, unless exposure assumptions have changed. If that's the case an explanation should be included. (We recognize the discussion in Section 7.2.2 discusses this, but the way the sentence reads it implies generic values are more appropriate than site specific.)
7. Page 7-13, OU B-1 **Soil** discussion: The paragraph refers to Region 9 PRGs changing. Further on in the paragraph it says the sampling results were well below the new (16 ug/kg) cleanup level. PRGs are not cleanup levels, unless the ROD selected that as the cleanup level. If that was the case, it would be useful to state that. The rationale on protectiveness is acceptable.
8. Page 7-16, Last Paragraph: Toward the end of this paragraph there is a discussion on NOAA's ERL and ERM for PCBs. The ERM value is incorrect. It should be 0.180 mg/kg, not 0.018 mg/kg.
9. Table 7-2: the value of "none" should be explained. Does none mean 0.0, or no value exists? For revised numbers does it mean ADEQ eliminated that chemical from their standards? What is the significance of the values in parentheses? Why were the changes adopted in the 18 AAC 70 amendment not shown? All symbols on future documents should be defined.
10. Table 7-3: The reference to Region 9 PRGs is inappropriate for sediment values. The Region 9 PRGs do not apply to sediments. Recommend using either NOAA Screening Quick Reference Tables or Washington State Screening values.
11. Page 9-3, Sec. 9.2, 2nd Para, 1st Sent: This sentence should be revised to read: "Completion of the OU B-1 remedy is pending Navy, EPA, and ADEC concurrence on the Work Plan for implementing the OU B-1 remedy selected in the December 2001 Record of Decision for the Mount Moffett Sites...."
12. Navy response to EPA specific comment #35, #36, and #37: Although the Navy may not have the legal ability to impose institutional controls at the sites, the Navy does have the legal authority, and obligation, under 42 U.S.C. 9620 120(h)(3)(A)(ii) to take any additional remedial action found to be necessary after the date of such transfer. If an institutional control is not implementable, then another action should be considered.

13. Navy Response to EPA comment #46: EPA cannot concur that the Navy has no authority to police or patrol all of the OU B sites. The Navy characterizes these sites as part of a "Military Reservation" for which the Navy controls access. See Draft Final Feasibility Study Supplement (15 JAN 07) at ES-1. EPA cannot believe that the Navy, as part of the military, has no authority to patrol a Military Reservation that it purports to maintain. If the Navy truly has no authority to patrol the OU B sites, then the Navy's ability to implement Institutional Controls at Adak to prevent trespassing and exposure to unexploded ordnance would be severely limited and unreliable. In addition, if the property is ever transferred, 42 U.S.C. 9620, CERCLA Sections 120(h)(3)(A)(ii) and (C)(ii) provide the authority the Navy claims it does not have. EPA requests the Navy to respond to this comment in a letter within 30 days of receipt of EPA's independent protectiveness determination.

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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 February 2006

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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