

FORMER NAVAL COMPLEX ADAK, ALASKA

OPERABLE UNIT A RECORD OF DECISION AMENDMENT PROPOSED PLAN

May 2003

This Proposed Plan describes the Navy's, Environmental Protection Agency's (EPA), and the Alaska Department of Environmental Conservation's (ADEC) rationale for Amending the *Former Adak Naval Complex Operable Unit A Record of Decision* (OU A ROD). It is provided in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Section 300.435(c)(2).

The Former Naval Complex Adak is located approximately 1,200 air miles southwest of Anchorage, Alaska, in the Aleutian Island chain (Figure 1). It occupies 76,800 acres on the northern portion of the Adak Island.

The purpose of the proposed OU A ROD Amendment is to:

- Replace subsistence fish advisory signs along Kuluk Bay and Sweeper Cove with fish advisory fact sheets for Adak residents; and
- Remove sixty-two (62) petroleum sites from the OU A ROD, consistent with the *Naval Air Station Adak Federal Facility Agreement (FFA)* and the *State-Adak Environmental Restoration Agreement (SAERA)* as amended in March 2002.

SCOPE AND ROLE OF THE FUNDAMENTAL CHANGE



Figure 1:
Adak Island
Location

Navy, EPA, and ADEC signed the OU A ROD in October 1999, March 2000, and April 2000, respectively. The OU A ROD included petroleum site remedies, consistent with the SAERA, an agreement between Navy and ADEC, and consistent with the FFA, a separate agreement among the Navy, EPA, and ADEC. This proposed OU A ROD Amendment modifies the requirements for the subsistence fish advisory signs along the shores of Sweeper Cove and Kuluk Bay, and replaces them with

fact sheets to target the residents of the City of Adak. The fact sheets will provide a greater level of detail on the presence of polychlorinated biphenyls (PCBs) in specific species, and will also discuss potential health risks and benefits associated with fish consumption. Since recreational fishing does not pose a health risk, advisory or educational materials will not be prepared regarding these exposure scenarios.

This proposed OU A ROD Amendment also removes sixty-two (62) petroleum sites (listed on page 3) from the OU A ROD and clearly establishes 18 AAC 75 as the basis for regulatory procedures and requirements for future petroleum cleanup decisions. The OU A ROD selected final decisions for forty-eight of the sixty-two petroleum sites. The petroleum sites are included in this Amendment in order to streamline regulatory oversight of the petroleum cleanup, and to potentially expedite the partial delisting of the Downtown Area from the NPL. The OU A ROD selected interim remedies for the fourteen of the petroleum sites without defining the process for selecting a final remedy. The amendment establishes that the final remedies for these 14 sites, known as the petroleum free-product recovery sites will not be selected under a CERCLA ROD, but will instead be selected by the Navy and the State of Alaska using the state's petroleum release regulations. These regulations have been changed significantly since the OU A ROD (see below) and can be found in 18 AAC 75.

The OU A ROD and SAERA maintain that the primary regulatory authority for the petroleum-contaminated sites is Alaska's regulations. The revisions, grouped under Article 3 as 75.300 to 75.396, constituted a comprehensive reorganization and revision of the petroleum cleanup regulations. It is the intent of the OU A ROD to have the petroleum sites cleaned up in accordance with these applicable state regulations.

In order to meet the ADEC cleanup standards, recoverable free-product had to be first removed by using product-recovery systems. This first step is referred to in the OUA ROD as the Interim Remedial Action. After it becomes obvious that free-product can no longer be efficiently removed using these systems due to the presence of small amounts of petroleum, a final remedy must be chosen.

This proposed OU A ROD Amendment would remove forty-eight petroleum sites that have final remedies and fourteen petroleum free-product recovery sites that were selected for interim remedies from the federal CERCLA Record of Decision and confirm Alaska's regulations 18 AAC 75 as the basis for regulatory procedures and requirements for future petroleum cleanup decisions.

The Navy will use a focused feasibility-like process to evaluate several potential remedies that might work to clean up the remaining petroleum contamination. This process looks at the risks associated with the presence of the remaining petroleum at the sites and gives the best cleanup choice to complete the cleanup (Final Remedy). The cleanup and decision process is presented as guidance to ADEC project managers in the *Guidance on Decision Documentation Under the Site Cleanup Rules* (18 AAC 75.325 - 18 AAC 75.390).

For the forty-eight other petroleum sites, final remedies were selected in the OU A ROD. These sites are included in this proposed OU A ROD Amendment in order to streamline regulatory oversight of the petroleum cleanup, and to potentially expedite the

partial delisting of the Downtown Area from the National Priority List of contaminated sites.

This proposed Amendment also contains a significant difference from the OU A ROD. The requirements for the subsistence fish advisory signs at Sweeper Cove and Kuluk Bay are modified allowing the signs to be replaced by fact sheets. The fact sheets will target the residents of the City of Adak and provide a greater level of detail on the presence of PCBs (polychlorinated biphenyls) in specific species. They will also discuss potential health risks and benefits associated with fish consumption. Since recreational fishing poses no unacceptable health risks, no advisory or educational materials will be prepared regarding these exposure scenarios.

The proposed OU A ROD Amendment is based on available information in the administrative record, located at Naval Engineering Field Activity, Northwest, 19917 7th Avenue NE, Poulsbo, WA 98370.

How You Can Participate

The Navy, EPA, and ADEC encourage you to comment on this proposed OU A ROD Amendment. You may comment in person at the public meeting to be held on May 28, 2003 in Anchorage, or you may submit your written comments to:

Mark Murphy, N05ER2
Engineering Field Activity, Northwest
19917 7th Avenue NE
Poulsbo, WA 98370
Murphym@efanw.navy.mil
1-866-239-1219

Information regarding the petroleum regulations (18 AAC 75) and guidance documents may be accessed via the internet at:

18 AAC 75 may be found at
www.state.ak.us/dec/dspar/csites/

The Guidance may be found at
www.state.ak.us/dec/dspar/csites/guidance/decisdoc.pdf

Petroleum sites addressed in this proposed OU A ROD Amendment (14 Free Product Sites Shown in Boldface)

Amulet Housing, Well AMW 706 Area
 Amulet Housing, Well AMW 709 Area
 Antenna Field (USTs ANT 1, ANT 2, ANT 3, and ANT 4)
 ASR 8 Facility (UST 42007 B)
 Boy Scout Camp, West Haven Lake (UST BS 1)
 Contractors Camp Burn Pad
 Finger Bay Quonset Hut
 Former Power Plant Building (T 1451)
GCI Compound (UST GCI 1)
 Girl Scout Camp (UST GS 1)
 Housing Area (Arctic Acres)
 MAUW Compound (UST 24000 A)
 Mount Moffett Power Plant No. 5 (USTs 10574 through 10577)
 NAVFAC Compound (USTs 20052 and 20053)
 Navy Exchange Building (UST 30027 A)
 New Roberts Housing (UST HST 7C)
 NMCB Building Area (UST T-1416-A)
NMCB Building Area, T 1416 Expanded Area
NORPAC Hill Seep Area
 Officer Hill and Amulet Housing (UST 31047 A)
 Officer Hill and Amulet Housing (UST 31049 A)
 Officer Hill and Amulet Housing (UST 31052 A)
 Quarters A
 ROICC Contractor's Area (UST ROICC 7)
 ROICC Contractor's Area (UST ROICC 8)
 ROICC Warehouse (UST ROICC 2)
 ROICC Warehouse (UST ROICC 3)
 Runway 5-23 Avgas Valve Pit
SA 73, Heating Plant No. 6
 SA 77, Fuels Facility Refueling Dock, Small Drum Storage Area
SA 78, Old Transportation Building (USTs 10583, 10584, and ASTs)
 SA 79, Main Road Pipeline
SA 80, Steam Plant No. 4 (USTs 27089 and 27090)
 SA 81, Gun Turret Hill (USTs 10593 and 10595)
SA 82, P 80/P 81 Buildings (UST 10579)
 SA 84, Sand Shed
 SA 85, New Baler Building
 SA 86, Old Happy Valley Child Care Center
 SA 87, Old Zeto Point Wizard Station
SA 88, P 70 Energy Generator (UST 10578)
 SA 89, Tank Farm C
South of Runway 18-36 Area
 SWMU 14, Old Pesticide Storage and Disposal Area
 SWMU 15, Future Jobs/Defense Reutilization Marketing Office (Non-Petroleum Chemicals)
SWMU 17, Power Plant No. 3
 SWMU 22, Avgas Drum Storage Area South of Tank Farm A
 SWMU 31, Runway 18-36 Avgas Drum Disposal Area
 SWMU 34, Steam Plant #4, Used Oil AST
 SWMU 35 Ground Support Equipment (GSE) Used Oil AST
 SWMU 41, Ground Support Equipment (GSE) Used-Oil Storage Area
 SWMU 44, AIMD Used Oil Storage Area
 SWMU 45, Sewage Treatment Plant Petroleum Contamination
 SWMU 56, Public Works Transportation Department (UST T 1441 A)
 SWMU 57, Fuels Facility Refueling Dock
SWMU 58, Heating Plant No. 6
 SWMU 60, Tank Farm A
 SWMU 61, Tank Farm B
SWMU 62, New Housing Fuel Leak
 SWMU 64, Tank Farm D, Northern Area
Tanker Shed (UST 42494)
Yakutat Hangar, USTs T 2039 A
 Yakutat Hangar, USTs T-2039 B, and T-2039 C

Public Meeting

Location: ADEC Offices
Anchorage, Alaska
Date: May 28, 2003
Time: 6:00 PM (Anchorage Time)

A public comment period will be held from May 16 through June 16, 2003

Please Submit Comments to:
Mark Murphy
Naval Engineering Field Activity, Northwest
19917 7th Avenue NE
Poulsbo, WA 98370
murphym@efanw.navfac.navy.mil

Information regarding the petroleum regulations (18 AAC 75) and guidance documents may be accessed via the internet at:
18 AAC 75 may be found at www.state.ak.us/dec/dspar/csites/ or www.state.ak.us/dec/dspar/csites/guidance/decisdoc.pdf

Commanding Officer, N05ER2
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