



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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OFFICE OF
ENVIRONMENTAL CLEANUP

SEP 13 2011

Captain Pete Dawson
Commanding Officer
Naval Base Kitsap
120 South Dewey Street
Bremerton, Washington 98314

RE: Final Second Five-Year Review, Jackson Park Housing Complex/Naval Hospital Bremerton, Bremerton, Washington, dated January 4, 2011.

Dear Captain Dawson:

The U.S. Environmental Protection Agency has reviewed the final 2010 Five-Year Review for the Jackson Park Housing Complex/Naval Hospital Bremerton National Priorities List site. This is the Second Five-Year review completed for the Jackson Park NPL site.

The EPA has reviewed the referenced document for technical adequacy, accuracy, and consistency with the National Contingency Plan and EPA Guidance. The document provides a summary of the status and protectiveness of the Operable Units for which Records of Decision have been completed for the Jackson Park NPL site. It also identifies actions to be taken that ensure the protectiveness of the selected remedies and ongoing remedial actions and documents a schedule for completion of the recommended actions.

Based on the EPA's review of the 2010 Five-Year Review, the EPA generally concurs with the Navy's determinations and recommendations, except as noted below. The EPA's primary focus was on ongoing groundwater remedial actions for the OU-1 Benzene Release Area and the adequacy of marine tissue sampling results in which to assess human health risks as outlined in the OU-1 ROD. In the case of the OU-1 Benzene Release Area, the EPA believes the schedule for completion of the follow-up actions needs to be more aggressive than proposed by the Navy in order to ensure protectiveness and provide adequate information for the next Five-Year Review. Many of these same remedy review recommendations were identified in the EPA's comments on the 2005 Five-Year Review.

The following are the EPA's protectiveness determinations and the additional recommendations and follow-up actions necessary to address issues raised in the 2010 Five-Year Review.

OU 1 Benzene Release Area

The EPA concurs that the current groundwater remedy for the OU-1 BRA is Not Protective based on current and future use scenarios. The Navy's Five-Year Review Recommendation 3 on Table 8-1 calls for "complete additional investigation and pilot testing related to the Benzene Release Area, and optimize the remedy for this area" by the milestone date of December 2015. However, the recommendation should include implementing the optimization, including an alternative remedy to the current groundwater remedy. To ensure that the optimized system is successfully implemented, the

milestone date should be moved up a year to December 2014 to allow time to collect and evaluate preliminary performance monitoring data before the next Five-Year Review in December 2015.

OU-1 Marine Tissue Sampling

The EPA concurs that the protectiveness of the remedy with regard to human consumption of marine tissues cannot be determined at this time. The EPA cannot make a protectiveness determination in the absence of reliable analytical data that allows evaluation of the human consumption exposure pathway, including the Suquamish Tribe's subsistence scenarios. Therefore, the EPA is deferring its determination of protectiveness until adequate data are collected by the December 2011 milestone in Recommendation 5 in Table 8-1. The EPA has previously identified significant data quality problems in the 2002, 2004, and 2009 marine tissue-sampling events. Future marine tissue sampling events shall be based on an EPA reviewed and approved Sampling and Analysis Plan and Quality Assurance Project Plan as outlined in the NCP.

Section 9.0 Certification of Protectiveness

The EPA does not concur with the statement "human exposure to marine tissue is being prevented through institutional controls that prohibit harvesting of shellfish from Ostrich Bay." Marine tissues for human consumption of species other than shellfish such as sea cucumber and bottom fish such as flounder have no restrictions in Ostrich Bay with regard to "prohibited harvesting." The Washington Department of Natural Resources does in fact have a commercial season for sea cucumber in Central Puget Sound, which includes Ostrich Bay. These species were identified by the EPA divers in a survey conducted in Ostrich Bay, and sampled for ecological risk assessment purposes as part of the Jackson Park OU-2 Supplemental RI in 2009. Please provide the EPA with documentation that demonstrates reliable institutional controls that prohibit harvesting of all marine tissue samples for human consumption in Ostrich Bay.

If you have any questions on the EPA's protectiveness determination regarding the 2010 Five-Year Review, please have your staff contact Harry Craig at (503) 326-3689 or e-mail at craig.harry@epa.gov.

Sincerely,



Daniel D. Opalski
Director

cc: Mr. Douglas Thelin
NAVFAC NW

Mr. Barry Rogowski
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Ms. Denice Taylor
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Mr. John Bower
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