UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

DEC 30 2010

OFFICE OF
ENVIRONMENTAL CLEANUP

Captain Mark J. Olson
Commanding Officer
Naval Base Kitsap
120 South Dewey Street
Bremerton, Washington 98314-5020

Dear Captain Olson:

The Environmental Protection Agency (EPA) Region 10 has reviewed the Third Five Year Review report for the Naval Base Kitsap (NBK), Keyport Superfund site in Keyport, Washington. EPA reviewed this report for technical adequacy, accuracy, and consistency with EPA guidance.

EPA concurs with the protectiveness determinations in this report. I recognize that we had some difficult issues that we needed to work through and I appreciate the Navy's efforts to reach consensus with not only EPA, but also the Washington Department of Ecology (Ecology) and the Suquamish Tribe as well. The project team deferred decisions on some of these difficult issues and therefore, in this letter, we are highlighting the next steps for the work that lies ahead of us.

As stated in the report, the protectiveness determination for the remedy implemented at OU2 Area 8 has been deferred due to concerns about a slowly increasing trend in cadmium concentrations in sediments. Based on recent data, there is uncertainty as to why concentrations have started to increase. Therefore, more site characterization and assessment is necessary. We need information to help us determine if there is indeed a problem that requires additional work, or, on the other hand, to reassure us that there is, in fact, no cause for alarm and further work is not necessary. We currently do not have the data to make a determination that the existing remedy is working to ensure protectiveness. It is my expectation that the project team will work together in a collaborative fashion to collect the necessary information that will lead to a decision in which we can all have confidence.

The Recommendations section of the Five Year Review lays out a broad schedule of milestone completion dates that EPA will be tracking. As a first step, in this coming year the Navy, in conjunction with EPA, Ecology and the Suquamish Tribe, has committed to develop a Sampling and Analysis Plan that will be critical for framing the sediment and marine tissue characterization effort in Area 8. This plan is due by the end of December 2011. EPA looks forward to working with the Navy to not only meet this schedule, but also to develop a plan that will help us all reach the ultimate goal of understanding what is happening at Area 8.

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Thank you again for all the Navy's hard work to complete this Third Five Year Review in a timely manner. EPA looks forward to working with the Navy as we move to the next phase.

Sincerely,

Daniel D. Opalski
Director