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

05 MAY 2004

Captain R.F. Parker
US Department of the Navy
Engineering Field Activity Northwest
19917 7th Ave NE
Poulsbo, WA 98370

RE: NAS Whidbey Island Five Year Review

Dear Captain Parker:

The U.S. Environmental Protection Agency (EPA) is in receipt of the Final Five Year Review for NAS Whidbey Island which you signed on April 15, 2004. EPA has been working with the Navy during the past year on this Five Year Review, the second such review for this Superfund site. However, EPA did not get a chance to review the final version prior to your signature. Since that time, the final version of the report has been provided to us and we have had the opportunity to review the document. Most of the revisions we requested were incorporated and we concur with many of the Navy's conclusions. However, there are a few notable exceptions.

EPA recognizes that it is the Navy's responsibility, as the lead agency, to conduct the Five Year Review and to make determinations regarding the on-going protectiveness of the implemented remedies. However, EPA may either concur with the final Federal agency or department protectiveness determination, or EPA may provide independent findings. At Operable Units 1 and 3 (OU1 and OU3), EPA believes that a protectiveness determination cannot be made until further information is obtained.

In comments provided to the Navy on earlier drafts of the report, EPA requested that the Navy make it clear that due to new information such as the presence of 1,4-dioxane in the groundwater at the Area 6 landfill (OU1) and potential recontamination of the runway ditches (OU3), the Navy should not be stating that the remedies remain protective. EPA remains in disagreement with the Navy over how on-going protectiveness at NAS Whidbey Island is characterized in this review. While the final version of the report acknowledges that there may be potential new exposure pathways that could cause unacceptable risks at the Area 6 landfill and the runway ditch complex, the Navy's protectiveness statements are asserting that the remedies are currently protective.

EPA agrees with the actions outlined in the Five Year Review that the Navy intends to

take to further evaluate the issues raised in the report. These include additional sampling at OU1 to determine the extent of the 1,4-dioxane plume as well as an assessment of the non-point sources that may be causing recontamination of the OU3 runway ditches. It is expected that the 1,4-dioxane sampling and evaluation will be completed by the end of December, 2004, and that there will be additional assessment of the recontamination of the runway ditches by then as well. At that time, a protectiveness determination will be made by EPA. EPA's determination will be included in EPA's Report to Congress on the results of the five year reviews.

If you have any further questions, please contact Nancy Harney of my staff at (206) 553-6635.

Sincerely,

Kathryn M Davidson

Kathryn M. Davidson
Acting Director
Office of Environmental Cleanup

cc: John Gordon, EFA NW
Pam Kromholz, EFA NW
John Mosher, NAS Whidbey Island
Kathy Souders, NAS Whidbey Island
Barry Rogowski, Ecology
Beverly Gaines, EPA