



REGION 3

PHILADELPHIA, PA 19103

Captain Janet H. Days
Commanding Officer, Naval Station Norfolk
Captain Matt Fraenzimmer
Commanding Officer, Naval Support Activity Hampton Roads
Norfolk, Virginia
Sent via email

Dear Commanders Days and Fraenzimmer:

On January 29, 2024, the U.S. Environmental Protection Agency (EPA) received the Final Fifth Five-Year Review (FYR) Report for Naval Station Norfolk for concurrence. This review is required by Section 121(c) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended, 42 U.S.C. §9621(c), and by 40 CFR §300.430(f)(4)(ii) of the National Contingency Plan, which require that a periodic review be conducted no less often than every five years after the initiation of remedial actions at sites where hazardous substances, pollutants, or contaminants will remain at the site above levels that allow for unlimited use and unrestricted exposure. The Navy, as lead agency, has the responsibility of conducting this FYR and meeting the statutory deadline.

EPA has reviewed this FYR Report in accordance with EPA's Comprehensive FYR Guidance (OSWER No. 9355,7-03B-P, June 2001). Pursuant to this guidance, EPA's role as the final remedy selection authority at an NPL site under the jurisdiction of another Federal agency or department requires that EPA retain final authority to make protectiveness determinations in connection with the site. EPA may either concur with the Federal agency or department's protectiveness determinations or EPA may provide an independent determination. This determination will be entered in the Superfund Enterprise Management System (SEMS) and in our annual report to Congress. In this case, EPA is making an independent determination because EPA does not agree with the Navy's determination on 3 out of 9 operable units (OU) subject to this review.

Specifically, EPA concurs with the Navy's determination that the remedies for OU 6 (sediment) and OU 7 (soil, surface water and groundwater) – Site 6 Construction Debris Landfill; OU 8 – Site 22 Camp Allen Salvage Yard; OU 10 – Site 23 Building LP-20 Paint Shop; and OU13 – SWMU 14 Q-50 Area Satellite Accumulation Area are protective of human health and the environment because all exposure pathways have been addressed, remedies are in place and functioning as designed, no new information was identified that would question protectiveness of the remedies, and there are institutional controls in place to prevent human exposure to contamination remaining at these OUs.

EPA concurs with the Navy's determination that the remedies at OU 2 – Site 2 Naval Magazine Slag Pile and OU 4 – Site 20 Building LP-20 Area of protective in the short-term because all exposure pathways are under control and no unacceptable risks are occurring. However, in order for the remedy to be protective in the long-term, the Navy needs to complete the following actions:

OU 2 – Site 2 Naval Magazine Slag Pile

Issue: The Human Health Risk Assessment did not evaluate residential exposure pathway for soil or groundwater outside of cover.

Recommendation: Evaluate exposure pathway to ensure LUC boundary is defined.

Due Date: December 2024

OU 4 – Site 20 Building LP-20 Area

Issue: AS/SVE System is less effective at achieving RAOs

Recommendation: Evaluate pilot study of groundwater treatment to replace AS/SVE system; complete post-ROD documentation.

Due Date: December 2027

Issue: Remedy performance is not optimized

Recommendation: Continue to assess VI pathway and optimization efforts to reduce subsurface vapor source

Due Date: December 2027

Issue: PFAS detected in groundwater. Navy has recommended this site for a Remedial Investigation

EPA Recommendation: Prepare QAPP for PFAS RI

Due Date: April 2029

Additionally, EPA is issuing an independent determination for the remedies at OU3 – Site 3 Q - Area Drum Storage Yard and OU 14 – Site 18 Former Naval Magazine Waste Storage Area of protective in the short-term because all exposure pathways are under control and no unacceptable risks are occurring. However, in order for the remedy to be protective in the long-term, the Navy needs to complete the following actions:

OU3 – Site 3 Q - Area Drum Storage Yard

Issue: PFAS detected in groundwater. Navy has recommended this site for a Remedial Investigation.

EPA Recommendation: Prepare QAPP for PFAS RI

Due Date: April 2029

OU 14 – Site 18 Former Naval Magazine Waste Storage Area

Issue: PFAS detected in groundwater. Navy has recommended this site for a Remedial Investigation.

EPA Recommendation: Prepare QAPP for PFAS RI

Due Date: April 2029

EPA is issuing an independent determination for the remedy at OU 1, Site 1, of protectiveness deferred due to an unconfirmed presence of a vapor barrier at Camp Allen Elementary School. Additional information is needed to confirm an exposure pathway does not exist in the building. In order to make a protectiveness determination, the Navy needs to complete the following action:

OU 1 – Site 1 Camp Allen Land Fill

Issue: Vapor Intrusion pathway

Recommendation: Document installation of a vapor barrier at Camp Allen Elementary School

Due Date: June 2024

In addition, the following issues have been identified for Site 1.

Issue: Plume Boundary is not fully defined.

Recommendation: Install Additional monitoring wells to further define plume.

Due Date: January 2029

Issue: Potential for Vapor Intrusion near plume should be evaluated.

EPA Recommendation: Evaluate need for VI investigation at homes near well(s) with VISL exceedance

Due Date: April 2029

Issue: Remedy is underperforming.

Recommendation: Install additional extractions wells to expedite reduction of COC concentrations

Due Date: December 2024

Issue: PFAS detected in groundwater. Navy has recommended this site for a Remedial Investigation.

EPA Recommendation: Prepare QAPP for PFAS RI

Due Date: December 2024

Since EPA is deferring protectiveness for this OU, the Navy will need to submit a FYR addendum as soon as practical but no later than 6 months after completing the recommended actions. Documentation confirming installation can serve as the addendum. Thus, the projected addendum date will be 9/30/2024.

Furthermore, EPA has evaluated the sitewide Government Performance and Results Act measures and has determined their status as follows:

Environmental Indicators

- Human Health: Insufficient Data
- Groundwater Migration: Insufficient Data to Determine Contaminated Groundwater Migration Control Status for all PFAS contamination at site

Sitewide Ready for Anticipated Use

The facility was determined to be Site-Wide Ready for Anticipated Use in 2012.

The requirement for this five-year review at Naval Station Norfolk was triggered by the last five-year review date of April 4, 2019. The next five-year review will be due April 4, 2029, five years from the planned completion date of this Five-Year Review. If you have any questions, please feel free to contact Remedial Project Manager, Lisa Donahue at donahue.lisa@epa.gov.

Sincerely,

Paul Leonard, Director
Superfund and Emergency Management Division

cc: Rebecca Whalen, RPM (Navy)
Eric Salopek, RPM (VDEQ)