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JEB LITTLE CREEK
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LETTER FROM U S EPA REGION III REGARDING FINAL SECOND COMPREHENSIVE FIVE
YEAR REVIEW NAB LITTLE CREEK VIRGNIA BEACH VA (PUBLIC DOCUMENT)
03/27/2014
U S EPA REGION III



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

MAR 27 2014

Capt. F.E. Hughlett
Commanding Officer
Joint Expeditionary Base Little Creek-Fort Story
2600 Tarawa Court, Suite 100
Norfolk, Virginia 23521

Subject: Final Second Comprehensive Five-Year Review, Joint Expeditionary Base Little Creek,
Virginia Beach, Virginia

Dear Captain Hughlett:

Thank you for submitting the Department of the Navy (Navy) Naval Facilities Engineering Command Mid-Atlantic Report, entitled "*Final Second Comprehensive Five-Year Review, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia*," dated March 2014, to the U.S. Environmental Protection Agency (EPA). The purpose of this letter is to provide concurrence on this report. The Navy conducted this Five-Year Review as required by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Section 121(c), as amended, and the National Oil and Hazardous Substances Pollution Contingency Plan, Part 300.430(f)(4)(ii) of 40 Code of Federal Regulations. EPA has reviewed this Five-Year Review report and found it to be consistent with EPA's June 2001 guidance document, Comprehensive Five Year Review Guidance (OSWER No. 9355.7-03B-P, EPA 540-R-01-007).

A Five-Year Review is required for remedial actions that have resulted in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure (UU/UE). There are currently a total of 12 Operable Units (OUs) at Joint Expeditionary Base (JEB) Little Creek: four with Records of Decision (RODs) where UU/UE has been achieved; one in the remedial investigation phase; and seven which are the subject of this second Five-Year Review.

This second Five-Year Review was triggered by the EPA concurrence date of March 31, 2009 on the first Five-Year Review report. The Protectiveness Statements for each OU will be reported to Congress as required by CERCLA Section 121(c). Five-Year Review Summaries for each OU, also contained in the report, are provided below for documentation purposes.

OU 1 (Site 7 – Amphibious Base Landfill)

Issue:

- *Remedy capital costs are below the -30%/+50% range estimated in the ROD.*

Recommendation and Follow-up Action:

- *Evaluate changes to remedy costs and prepare the appropriate documentation, as needed.*

Protectiveness Statement:

The remedy at Site 7 is in place, functioning as designed, and is protective of human health and the environment. The soil cover is in good condition and prevents direct contact with landfill contents. Land Use Controls (LUCs) are in place and prevent unauthorized intrusive activities and unauthorized site use. Groundwater monitoring data indicate a release has not occurred from the landfill. There have been no changes in the physical conditions or use of the site that would affect the protectiveness of the remedy.

OU 3 (Site 9 – Driving Range Landfill) and OU 4 (Site 10 – Sewage Treatment Plant Landfill)

Issues:

- *Due to discussions during the current five-year review period to cease groundwater sampling, data to evaluate groundwater quality since completion of the previous Five-Year Review are not available for Sites 9 and 10 landfills.*
- *Ruts in the soil cover and debris, including steel pipe, asphalt, and tires, were observed during the site inspection at Site 10.*

Recommendations and Follow-up Actions:

- *Reach consensus regarding the sampling of groundwater and, as needed, develop and implement a groundwater sampling plan in conjunction with Five-Year Reviews to demonstrate continued protectiveness of the remedy.*
- *Repair existing ruts and remove surface debris from Site 10. Continue annual landfill inspections to monitor potential continued debris disposal and cover conditions. Conduct an investigation to determine the means by which debris has been disposed of within the area and make recommendations to prevent future disposal activities.*

Protectiveness Statement:

The remedies at Sites 9 and 10 are in place, functioning as designed, and are currently protective of human health and the environment. Exposure pathways that could result in unacceptable risk are being controlled through a combination of soil cover and LUCs. There have been no changes in the physical conditions of the sites that would affect the protectiveness of the remedy. However, in order to determine if the remedies are protective in the long-term, a consensus on five-year review data requirements should be reached and, as needed, a groundwater sampling and analysis plan developed and implemented in conjunction with Five-Year Reviews to demonstrate continued protectiveness of the remedy.

EPA notes the tire ruts from vehicle training operations and surface debris observed during the Site 10 inspection were minor and did not impact the protectiveness of the remedy.

OU 5 (Site 11 – School of Music Plating Shop)

Issue:

- *Risk Screening Levels have been established for 1,4-dioxane. Previous sampling did not include analysis of this constituent; therefore, the presence or absence of 1,4-dioxane in Site 11 groundwater is unknown.*

Recommendation and Follow-up Action:

- *Sampling for 1,4-dioxane to confirm its the presence or absence in groundwater.*

Protectiveness Statement:

The remedy at Site 11 is in place, functioning as designed, and is currently protective of human health and the environment. Exposure pathways that could result in unacceptable risk are being controlled through LUCs. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. However, in order to evaluate the long-term protectiveness of the remedy, a groundwater evaluation to determine the presence or absence of 1,4-dioxane should be completed.

OU 12 (Site 11a – Building 3033 Former Vehicle Repair Facility and Waste Oil Tank)

Issue:

- *Remedy capital costs are below the -30%/+50% range estimated in the ROD.*

Recommendation and Follow-up Action:

- *Evaluate changes to remedy costs and prepare the appropriate documentation, as needed.*

Protectiveness Statement:

The remedy at Site 11a is in place, functioning as designed, and is protective of human health and the environment. Exposure pathways that could result in unacceptable risk are being controlled through LUCs. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy.

OU 6 (Site 12 - Former Exchange Laundry/Dry Cleaning Facility)

Issue:

- *No project action levels in Long Term Monitoring Uniform Federal Policy Sampling and Analysis Plan to account for potential ecological exposures at the groundwater/surface water interface.*

Recommendation and Follow-up Action:

- *Revise existing surface water project action levels in the plan to account for potential ecological exposures at the groundwater/surface water interface within the canal.*

Protectiveness Statement:

The remedy at Site 12 is in place, functioning as designed, and is protective of human health and the environment. Exposure pathways that could result in unacceptable risk are being controlled through LUCs. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy.

EPA notes a comparison of monitoring well data to project action levels, i.e., freshwater ecological screening values, was completed. All groundwater concentrations were below the screening values.

OU 7 (Site 13 - Former Public Works Pentachlorophenol (PCP) Dip Tank and Wash Rack)

Issue:

- *Remedy costs to date are above the -30%/+50% range estimated in the ROD.*

Recommendation and Follow-up Action:

- *Evaluate changes to remedy costs and prepare the appropriate documentation, as needed.*

Protectiveness Statement:

The remedy at Site 13 is in place, functioning as designed, and is protective of human health and the environment. Exposure pathways that could result in an unacceptable risk are being controlled through LUCs. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy.

Furthermore, as part of this five-year review, EPA has evaluated the Government Performance and Results Act (GPRA) measures for this site and has determined their status is as follows.

Environmental Indicators

Human Health: Current Human Exposure Under Control

Groundwater Migration: Groundwater Migration Under Control

Sitewide Ready for Anticipated Use

The Site is not Site-Wide Ready for Anticipated Use but is expected to be by 6/30/2015.

EPA concurs with the protectiveness determinations for all seven OUs and congratulates the Navy in preparing and completing the second Five-Year Review report consistent with EPA's June 2001 guidance document. The third Five-Year Review report will be due March 31, 2019.

If you have any questions, please contact Paula Estornell, Chief of the NPL/BRAC Federal Facilities Branch, at 215-814-5632 or Jeffrey M. Boylan, Remedial Project Manager, at 215-814-2094.

Sincerely,



Cecil Rodrigues, Director
Hazardous Site Cleanup Division
Region III

cc: Mr. Bryan Peed, Naval Facilities Engineering Command Mid-Atlantic
Mr. Paul E. Herman, P.E., Virginia Department of Environmental Quality