

9/3/08-02156

Landin, Paul/VBO

From: Salopek, Eric [ejsalopek@deq.virginia.gov]
Sent: Wednesday, September 03, 2008 8:59 AM
To: Johnson, Winoma A CIV NAVFAC MidLant
Cc: Hirsh.Steven@epamail.epa.gov; Rosnick, Holly/WDC; Landin, Paul/VBO
Subject: NSN Draft 5 Year Review Report

Winoma,

Subsequent to the completion of our review, the VDEQ would like to submit the following draft comments on the *Draft Five-Year Review Report* for Naval Station Norfolk, received May 2008.

1. Five-Year Review Summary Form: 5. Site 20, Building LP-20 Site: B. Recommendations and Follow-up Actions: This section stated "The potential for vapor intrusion should be performed based on volatile organic compounds...within the groundwater." The VDEQ has concerns with the utilization of this approach as a surrogate for conducting indoor air and sub-slab monitoring at the Building LP-20 site. While our office recognizes that the concrete cover system has been implemented at Building LP-20, additional data may need to be collected to address VOC indoor air concerns.
2. Page 4-9: Section 4.8. Site 1 Recommendations and Follow-up Actions: This section stated "...utility trenching activities were observed in Area A...Additionally...excavation for a drainage ditch in Area A was observed. Both of these activities resulted in a breach of the landfill cover." As stated, the Navy has revised an *internal review process* to address land use controls. Will the result of the referenced Navy process translate into additional signage along perimeter security fences/structures in Area A?
3. Page 8-6: Section 8.6. Site 20 Technical Assessment: Changes in Risk Assessment Methodologies: This section stated "As part of the AS/SVE pilot study, air monitoring was completed at 22 perimeter utility manholes and inside Building LP-26 to assess the degree of vertical and horizontal migration of the sparged contaminants...into manhole structures." Has any air monitoring activities (indoor air, manhole or sub-slab) been conducted in the area since the AS/SVE pilot test?
4. The VDEQ concurs with the conclusions in the Protectiveness Statements for Site 1, Site 2, Site 3, Site 6, Site 20, Site 22 and Site 23, and that the remedies are functioning to protect current human health and the environment and are expected to remain protective in the future.

Please let me know if you have any questions.

Thank you,

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