



REGION 10

SEATTLE, WA 98101

September 29, 2025

Captain John Hale
Commanding Officer
Naval Base Kitsap - Bangor
1101 Tautog Circle
Silverdale, Washington 98315-1101

Dear Captain Hale:

The U. S. Environmental Protection Agency Region 10 (EPA) has reviewed the Final Sixth Five-Year Review (FYR) Report for the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites associated with Naval Base Kitsap-Bangor. The conclusions in this letter are based on the signed Final Sixth FYR Report which is dated September 17, 2025. It is EPA policy to make a protectiveness determination at federal facilities by the statutory FYR due date, which for Bangor is September 30, 2025.

The EPA reviewed the Final Sixth FYR Report for technical adequacy, accuracy, and consistency with the National Contingency Plan, CERCLA, and EPA guidance. The report provides a summary of the status and protectiveness determinations on operable units (OUs) for which Records of Decision (RODs) have been issued and are not considered No Further Action (NFA). It also identifies actions to be taken that ensure protectiveness of the selected remedies and ongoing remedial actions and documents a schedule for completion of the recommended actions at the respective OU.

The EPA is making an independent finding of protectiveness for OU 8. The following are the EPA's protectiveness determinations for all the OUs that will be provided in EPA's annual report to Congress. Also included are additional recommendations and follow-up actions necessary to address issues raised in the FYR Report that affect or could affect protectiveness. OU 8 is discussed below, with reference to the corresponding numeric OU designations assigned in EPA's Superfund Enterprise Management System database.

OU 8

The EPA does not concur with the "short-term protective" determination for OU 8 and is making an independent finding of "not protective". OU 8 is included in an ongoing PFAS RI and PFAS has not been delineated at this site. The nature and extent of PFAS contamination and a cumulative risk assessment will need to be completed by the Navy.

More specifically, the EPA considers the remedy at OU 8 to be not protective because of the following issues:

1. On- and off-base PFAS delineation and groundwater flow model is ongoing and pending a Remedial Investigation Report.
2. PFAS exposures above the MCLs are known in this area.

The following actions need to be taken to ensure protectiveness:

1. Submit OU8 PFAS RI Report to the EPA by the end of fiscal year 2030 (September 30, 2030).
2. Address the residential wells that have PFAS concentrations above the MCLs.

Below is a table summarizing the protectiveness determinations.

Operable Unit Name	Navy Protectiveness Determination	EPA Protectiveness Determination
OU 1, Site A	Protective	Protective
OU 2, Site F	Protective	Protective
OU 3	Protective	Protective
OU 6	Protective	Protective
OU 7	Protective	Protective
OU 8	Short-Term Protective	Not Protective

Sitewide – Bangor Naval Submarine Base: EPA Site ID WA5170027291

PFOS and PFOA are present at OU 8 with concentrations above the current MCL of 4 ppt and exceeding the current regional screening levels (RSLs). PFAS in groundwater at this OU may impact the protectiveness of the remedies. There are known off-base residential drinking water wells that have been impacted and are being addressed through LUCs and removal actions. As of the most recent PFAS sampling and public outreach effort in February of 2024, additional PFAS contaminated residential wells were discovered.

The Navy plans to continue the PFAS off-base drinking water sampling and outreach efforts again through the Department of Defense policy on PFAS implementation. At this point, there are known exceedances of PFOS and PFOA above the MCLs at private wells that have not been addressed. Therefore, the EPA considers the remedies at OU 8 to be not protective of human health and the environment. The EPA will be reporting these protectiveness determinations in its FY 2025 Report to Congress.

The next FYR is due September 30, 2030. It is my understanding that our staff will continue to discuss a timeline that would ensure EPA receives the draft report with adequate time to provide comments to the Navy, and to allow follow-up discussions and revision of the next draft FYR Report. Our goal is to be able to work with the Navy to come to a resolution on issues, recommendations, and protectiveness determinations before the statutory deadline.

If you have questions concerning this letter, please contact the Remedial Project Manager, Chan Pongkhamsing, at 206-553-1806 or by email to pongkhamsing.chan@epa.gov.

Sincerely,

**CALVIN
TERADA**

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Calvin J. Terada

Director

Superfund and Emergency Management Division

cc: Mr. Phillip Nenninger
Environmental Restoration Manager
Naval Facilities Engineering Command, Northwest