APPENDIX M
SITE PHASES IN THE DON'S ENVIRONMENTAL RESTORATION PROGRAM

Site phases in the DON's Environmental Restoration Program include:

PRELIMINARY ASSESSMENT

The installation restoration process normally begins with a Preliminary Assessment (PA) which is accomplished by the Naval Facilities Engineering Command (NAVFACENGCOM). The purpose is to identify potentially contaminated sites at an installation. This step involves the collection and review of readily available, existing information on past hazardous waste disposal operations or hazardous material spills at Navy or Marine Corps installations. The information is studied to determine the potential for the presence of hazardous substances. It considers pathways of exposure and possible receptors, the source, nature and threat of any release, the magnitude of the potential threat and whether or not removal or treatment is necessary.

SITE INSPECTION

A Site Inspection (SI) is performed for sites identified in the PA as potentially contaminated. The purpose is to augment the data collected in the PA and to generate, if necessary, sampling and other field data to determine if further action or investigation is warranted. It consists of an on-site investigation to determine whether there is a release or potential release and the nature of the associated threats.

Information from the PA and SI are used by the Environmental Protection Agency (EPA) to determine if an installation should be proposed for inclusion on the National Priorities List (NPL). The NPL is a list of sites nationwide, both public and private, that pose the greatest threat to human health or the environment. EPA makes this determination through their Hazard Ranking System (HRS) which assesses the information provided on a site and calculates an HRS score. An HRS score of 28.5 or greater qualifies the site for the NPL. The DON, in accordance with DOD policy, enters into a Federal Facilities Agreement (FFA) with the cognizant EPA region as soon as possible after the installation is listed on the NPL. In many cases, states in which NPL installations are located are third parties to the FFA. The FFA specifies the roles and responsibilities of the regulatory agencies and the DON. It also establishes milestones for future cleanup actions.

REMEDIAL INVESTIGATION/FEASIBILITY STUDY

If a site is verified as contaminated in the SI, it then proceeds to a Remedial Investigation/ Feasibility Study (RI/FS). The purpose of the RI/FS is to determine the nature and extent of the threat presented by a release, and where appropriate, to evaluate proposed remedies. The RI is a detailed study that involves a variety of investigative sampling and analytical activities, including installation of monitoring wells, and geophysical studies. It also includes the collection of soil, air, water and other samples to determine contaminant characteristics, hazards and routes of exposure. When appropriate, a Human Health Risk Assessment and an Ecological Risk Assessment are conducted according to EPA guidelines. The FS uses information generated by the RI to identify potential cleanup actions. During the FS, a number of potential remedial alternatives are developed and screened to evaluate their ability to meet a range of factors including technical and regulatory requirements. After consideration of public and regulatory agency comments, the RI/FS is concluded by selection of the remedy, which may also include a recommendation of no further action. The selection is documented by a Record of Decision (ROD) for NPL sites and by a Decision Document for sites not listed on the NPL.

REMEDIAL DESIGN

A site identified in the RI/FS as requiring a cleanup action will then move into the Remedial Design (RD) phase. The goal of the RD is to prepare all technical drawings and specifications needed to implement the selected cleanup action. The Remedial Design begins the cleanup phase.

INTERIM REMEDIAL ACTIONS, REMOVALS, REMEDIAL ACTION

Interim Remedial Actions (IRAs) and removal actions may be undertaken at any point during the investigation or cleanup of a site to respond to a release that may present an imminent and substantial threat to human health or the environment, to reduce the overall risk of a site or to stabilize a site until the final cleanup action can be completed. On an increasing basis, the DON is using IRAs as a tool to quickly respond to site contamination, reduce study costs and accelerate the cleanup process.

The Remedial Action (RA) is the actual construction, operation and implementation of the selected final cleanup action.

The DON's overall goal for FY-96 was to allocate at least 65% of its DERA budget on cleanups.

RESPONSE COMPLETE

When the DON has completed all the necessary study and cleanup actions, and the DON considers all work completed, the site is designated Response Complete (RC). At this point, regulatory concurrence that all work is complete is sought from the appropriate agencies.

SITE CLOSEOUT

When no further actions under the IRP are considered by the DON to be appropriate because the site does not pose a threat to human health or the environment and consent from the regulators is obtained, the site is designated Site Close Out (SCO). At NPL installations, it is necessary for the EPA to concur with this decision. At non-NPL installations, state concurrence with SCO may be required, depending on the individual state policy. A site may be closed out at the end of the PA, SI, RI/FS or RA.