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Ray Morris

MEMORANDUM FOR CODES 09P, 10, 111 and 113

Subj: Navy Assessment and Control of Installation Pollutants (NACIP)
Program, Initial Assessment Studies (IAS)

Encl: (1) NAVENENVSA ltr 112N/WSE/pm 11000/1:273A Ser 1755 of 18 Dec 1981
(2) NACIP Program Management Plan, Executive Summary
(3) NACIP Program Elements, Initial Assessment Study

1. Enclosure (1) provides notification of pending commencement of NACIP IAS for Norfolk Naval Shipyard, Marine Corps Base, Camp Lejeune, and Marine Corps Air Station, Cherry Point. Enclosures (2) and (3) are included to provide insight to the Program and its Management Plan. In the IAS, the activities, as well as the cognizant EFD are tasked with making relevant file information readily available to the study team; in this case the consulting firm of Water and Air Research, Inc., of Gainesville, Florida.

2. Enclosure (1) also provides a listing of the types of information to be sought and reviewed in the IAS.

3. Addressees are requested to designate a point of contact and initiate an inventory of relevant file information. Additionally, points of contact are requested to telephone Code 114 (Mr. Jerry Wallmeyer, 444-9566) to confirm necessary arrangements.

4. It is anticipated that another NACIP IAS contract will be issued shortly for work at the Sewell's Point Complex, Craney Island, and Allegeny Ballistics Laboratory. Similar EFD action and information will be required.

R. D. CROWSON, P.E.
Director, Utilities, Energy
and Environmental Division

Blind Copy to:

114

T/By: 11S:ME/12-29-81

Doc. #0150M



DEPARTMENT OF THE NAVY
NAVAL ENERGY AND ENVIRONMENTAL SUPPORT ACTIVITY
PORT HUENEME, CALIFORNIA 93043

IN REPLY REFER TO:
112N/WSE/pm
11100/1:273A
Ser 1755
18 DEC 1981

From: Officer in Charge
To: Commander (114), Naval Facilities Engineering Command, Atlantic Division,
Norfolk, VA 23511

Subj: NACIP Initial Assessment Study at NSY Norfolk, MCB Camp Lejeune, and
MCAS Cherry Point

Ref: (a) OPNAVNOTE 6240 Ser 45/733503 of 11 Sep 1980
(b) MCO 6280.1 of 30 Jan 1981
(c) Navy Assessment and Control of Installation Pollutants (NACIP) Program:
Guide for Conducting an Initial Assessment Study, NEESA 20.2-035
(d) CNO ltr Ser 451/397464 of 3 Aug 1981

Encl: (1) Initial Assessment Study - EFD Records Review

1. The Navy Assessment and Control of Installation Pollutants (NACIP) program, references (a) and (b), provides for identification, assessment, and control of environmental contamination from past storage, use, and disposal of chemicals and hazardous materials at Navy and Marine Corps Activities. Details of the NACIP program are discussed in reference (c).
2. Under the NACIP program, the Naval Energy and Environmental Support Activity (NEESA), in coordination with an Engineering Field Division (EFD) of the Naval Facilities Engineering Command, conducts an Initial Assessment Study at an activity to ascertain the potential for contamination of the environment. This team of engineers and scientists reviews archival and activity records, interviews activity personnel, and makes an on-site inspection of the activity. If, as a result of the study, contamination is suspected, a follow-on confirmation study and corrective measures will be initiated by the cognizant EFD. If no contamination is found, no further action is required.
3. In reference (d), the Norfolk Naval Shipyard, Portsmouth, VA; the Marine Corps Base, Camp Lejeune, NC; and the Marine Corps Air Station, Cherry Point, NC, have been designated for an Initial Assessment Study (IAS). A consultant firm, Water and Air Research, Inc., of Gainesville, Florida, has been selected to conduct the study. Further details of the records search, Command brief, and site visitation, will be forwarded when scheduling is completed.
4. The EFD is requested to provide a person for liaison during all aspects of the NACIP study. This individual will also coordinate the review of available records at the EFD as specified in enclosure (2).

(1).

ENCLOSURE (1)

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5. The NEESA point of contact for this study is Mr. Eakes, Code 112N, A/V 360-3351, FTS-799-3351, or commercial (805) 982-3351.

Wallace Eakes

WALLACE EAKES
By direction

Copy to:
CMC (LFF-2)
COMNAVSEASYS COM (SEA 07C2)
COMNAVFACECOM (112)
Norfolk NSY
MCB Camp Lejeune, NC
MCAS Cherry Point, NC

INITIAL ASSESSMENT SURVEY-EFD RECORDS REVIEW

I. Records Available from NAVFAC Engineering Field Divisions:

- a. Environmental Branch
 - Activity Files (EESs, ESRs, A&E Studies, Project Information, Correspondence)
 - Applicable Regulations
 - Hazardous Materials Management Surveys & Plans
- b. Utilities Division
 - Utility Maps (Water, Sewage, etc.)
- c. Facilities Planning & Real Estate Department
 - General Development Map
 - Facilities Index
 - Activity Master Plans
 - EIAs/EISs
 - Real Property Listing
 - Military Readiness (NBC)
 - Real Estate Actions (Outleasing, Excessing, Geology Information, etc.)
 - Aerial Photos
- d. Maintenance or Utilities Division
 - Applied Biology (Pesticide Usage)

II. Type of Information Desired

General activity information including current and past operations; missions; history; layout; land usage; geology/hydrology; spill incidents; explosions; chemical usage; storage, and disposal; contamination incidents; and disposal operations.

Enclosure (1)

NACIP PROGRAM MANAGEMENT PLAN

EXECUTIVE SUMMARY

In the past few years, national attention has been focused on the public health and environmental issues emanating from inadequate past waste disposal practices. In keeping with public concern over these issues, the Department of the Navy has initiated a program to identify past operations which may have contaminated Navy and Marine Corps lands and to institute corrective measures, as needed. This program is named Navy Assessment and Control of Installation Pollutants (NACIP). The NACIP program consists of four phases:

(1) Initial Assessment Study (IAS) - collecting and evaluating all evidence which indicate the existence of pollutants which may have contaminated a site or pose an imminent health hazard for people located on or off the installation.

(2) Confirmation - performing field investigations, including physical and analytical monitoring, to confirm or deny contamination or a health hazard and to quantify the extent of any problem which may exist.

(3) Control Technology Development - developing pollutant treatment criteria, discharge standards and new technology design criteria to control or abate contamination.

(4) Corrective Measures - instituting needed remedial measures to control and mitigate contamination.

Extensive use is made of expertise available within the Department of Defense during the performance of NACIP investigations. In accordance with direction from the Chief of Naval Operations (CNO) and the Commandant of the Marine Corps (CMC), the NACIP program will be executed through the Naval Environmental Protection Support Service (NEPSS).

The NACIP program will systematically identify any contamination problems at Navy or Marine Corps installations, and then assess and control the effects of any contamination. Installations are designated as candidates for the program, and assigned relative priority for investigation, based on several factors, including: (1) current or past industrial operations, (2) the environmental sensitivity of the area, (3) the degree of development surrounding the installation, (4) and suspected contamination based on general knowledge or results of previous environmental investigations.

Candidate installations will normally receive initial assessment studies in the order of their assigned priorities. Such studies involve a review of documented evidence from installation and archival records, a physical survey of installation facilities, aerial surveys, and interviews with long-time employees. All evidence of potential contamination is documented in a technical report, with findings and recommendations. The report is subjected to extensive review by high-level Navy or Marine Corps personnel. Evidence

indicating the potential presence of a contamination problem which may pose an immediate health or environmental threat at the installation would be the basis for conducting a confirmation study.

The confirmation study will be performed by consulting engineers under contract. This study will normally involve sampling and analytical monitoring at potential contamination sites. The study will confirm or rule out the existence of a pollution problem. If contamination is discovered, the problem is quantified. Whenever necessary, interim measures, using available technology, will be initiated to control any migration of pollutants which may exit the installation boundary or which may endanger the health of on-base personnel.

Any contamination and/or migration problem that cannot be controlled using current state-of-the-art technology constitutes the basis for entering the control technology development phase in coordination with the U. S. Army Toxic and Hazardous Materials Agency (USATHAMA). The Department of the Navy will request that USATHAMA develop appropriate technology and standards. USATHAMA will develop pollutant criteria and standards in keeping with health and environmental considerations, establish appropriate sampling and analytical techniques as necessary, and provide design criteria for control and mitigation of the problem in a cost-effective manner.

Instituting corrective measures constitutes the final phase of the NACIP program. Design and construction of projects to institute these measures at Navy installations will be funded with Navy centrally-managed Pollution Abatement Program funds. Corrective measures at Marine Corps installations will be funded through normal funding channels utilizing Navy centrally-managed Pollution Abatement funds for projects of military construction scope, and Marine Corps special project funds for projects of lesser scope. Procedures consist of internal project and cost development, followed by review and approval at the appropriate level.

The NACIP program provides a systematic means of identifying and assessing contamination potential to ensure that the most urgent and important contamination problems may be addressed first. The program reflects the necessity for the Department of the Navy and the Department of Defense to ensure a clean environment and healthful living and working conditions at Navy and Marine Corps installations and surrounding civilian communities.

B. Initial Assessment Study

The objective of the Initial Assessment Study (IAS) is to ascertain whether any contamination exists that may pose a threat to human health or the environment. NEESA maintains a specially trained NACIP team to conduct IASs and monitor contracted IASs. In-house IAS studies are conducted by a team of engineers and scientists from NEESA and the OESO, supplemented as necessary by other expertise within DOD. Typically, the IAS team consists of three to five people headed by a team leader. Team members are specialists in such fields as: environmental engineering, chemistry, hydrology, geology, biology, ordnance and radiation safety. Contractor teams will be similar in makeup to those maintained in-house. IAS studies will be funded through the Navy centrally-managed Pollution Abatement Program.

The IAS consists of a systematic collection and evaluation of all available evidence to determine whether a hazard to human health or environmental contamination exists at an installation. During the study, pertinent records and documents from the installation and various archival sources are obtained and evaluated; knowledgeable personnel are interviewed; and field inspections are performed. A detailed guide describing IAS procedures is available from the Naval Energy and Environmental Support Activity, Code 212, Port Hueneme, CA, 93043.

A variety of sources are utilized in the search for installation records that may shed light on past operations. These include, but are not limited to:

- Files
- Naval History Office (Washington Navy Yard)
- National Archives (Washington, DC)
- Federal Records Centers (various locations)
- Engineering Field Division records and drawings
- Aerial photographic records
- DOD Explosive Safety Board files
- Naval Sea Systems Command files "SAFEORD" file (Alexandria, VA)
- NAVFAC Command Historian (NCBC Port Hueneme, CA)
- U. S. Geological Survey hydrogeology records

These records will be compiled by one or two members of the NACIP IAS team in an intensive search. The collected information will be reviewed and

lyzed by all team members for a minimum of two weeks before the team visits installation. Depending on the size and scope of the investigation, the length of the installation visit will vary from one to three weeks. Elements of the installation visit include:

- Installation command briefing on the NACIP program prior to the on-site survey,
- Survey of past and present industrial operations,
- Collection of existing hydrogeological, environmental, chemical, and biological information,
- Examination of hazardous waste, solid waste, and domestic/industrial wastewater operations,
- Aerial survey,
- Interviews with long-term employees,
- Physical inspection of the installation, its environs, and adjacent lands, and
- De-briefing of installation command upon departure.

The results of the IAS are summarized in a draft report, along with conclusions and recommendations. After a thorough internal review by the IAS team members and within NEESA, the report is forwarded for review and comment to the installation, the cognizant EFD, the Program Manager, and the responsible major claimant. These parties, along with the Program Director, constitute the NACIP IAS Review Board for the study. Initial response involves review of the draft report and concurrence in the recommendations or return of the draft with comments. If required, the NACIP Program Director may call a meeting of the Review Board to receive a formal briefing by the IAS team leader and to resolve any disagreements among the reviewers. The review board will then approve or amend the report recommendations, and decide whether to proceed with a Confirmation Study. Upon completion, the IAS report will be provided to all reviewers. Additional copies will be provided by NEESA for distribution by the installation.

The Confirmation Study will be conducted only if the review board concludes that:

(1) Sufficient evidence exists to suspect that contaminated disposal sites exist, and that

(2) The contamination presents a definite danger to (a) the health of civilians in nearby communities or installation personnel, or (b) the environment within or outside the installation. If a Confirmation Study is recommended, the IAS team will develop a preliminary scope of work for revision to the EFD.