

3/21/96-01505

RESTORATION ADVISORY BOARD MEETING

MARCH 21, 1996

7:00	Opening Remarks	Rear Admiral Robert. S. Cole Commander, Naval Base, Norfolk
7:15	Defense Environmental Restoration Account (DERA) Funding	Dave Forsythe - LANTDIV
7:30	Questions	
7:35	Break	
7:50	Relative Risk Ranking	Dave Forsythe - LANTDIV
8:05	Questions	
8:15	National Priorities List (NPL) Update	Dianne Bailey - Navy Co-chair
8:30	Questions	
8:40	Administrative Issues	Dianne Bailey - Navy Co-chair Jack Ruffin - Community Co-chair
8:50	General Questions/Comments	

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## NATIONAL PRIORITIES LIST (NPL) STATUS

Dianne Bailey  
Naval Base, Norfolk  
3/21/96

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### NPL STATUS

What is "NPL" ?

- ◆ EPA's list of industrial sites (federal & commercial) which are considered to be of national environmental concern
- ◆ Anticipate NBN being "proposed" in Spring/Summer 1996

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### NPL STATUS

Who "proposes" sites?

- ◆ EPA determines who gets listed using the Hazard Ranking System (HRS)
- ◆ Sites scoring greater than 28.5 are considered for listing
- ◆ States have to concur

## NPL STATUS

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What does HRS score?

- ◆ HRS scores:
  - Air contamination
  - Water contamination
  - Land contamination
  - Potential for human health risk
  
- ◆ Score is cumulative for *all sites* at Federal Facilities

## NPL STATUS

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What happens next?

- ◆ “Proposed” sites appear in Federal Register
  
- ◆ 45-day public comment period
  
- ◆ Become a “Listed” site
  
- ◆ Navy/EPA/State negotiate Federal Facility Agreement (FFA)

## NPL STATUS

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What is a FFA?

- ◆ Agreement between Navy, EPA and State
  - Sets time constraints for reports and cleanups
  - EPA oversees cleanup actions
  - EPA signs Records of Decision (RODs)
  - FFA includes IR sites and Solid Waste Management Units (SWMUs)

## NPL STATUS

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What is a SWMU?

- ◆ SWMUs are:
  - Hazardous Waste Accumulation Areas
  - Areas of past spills
  - Oil Storage Areas
  - Underground Storage Tanks
  
- ◆ Most SWMUs are still in use

## NPL STATUS

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How were SWMUs identified?

- ◆ 1991 study by EPA contractor
  
- ◆ SWMUs are not IR sites
  - IR sites identified under CERCLA; past actions
  - SWMUs identified under RCRA; current actions
  
- ◆ SWMUs are added to FFA for cleanup under DERA program

## NPL STATUS

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How many SWMUs are there?

- ◆ Study identified 140 SWMUs needed further action; sampling or documentation
  
- ◆ Three types of SWMUs
  - Site Screening Areas
  - Areas of Concern
  - Sites identified in an aerial photography study

## NPL STATUS

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Will the Base have to clean 140 sites?

- ◆ Most SWMUs will be visited by EPA officials to determine those needing cleanup
- ◆ Navy can negotiate with EPA on sites requiring cleanup
- ◆ Anticipate 50 SWMUs being added to FFA

## NPL STATUS

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What are pros/cons of NPL?

- |  |  |
|--|--|
| <ul style="list-style-type: none"><li>◆ Pros</li><li>- EPA adheres to review schedule</li><li>- Dedicated resources at EPA/State</li><li>- Cleanups occur faster</li></ul> | <ul style="list-style-type: none"><li>◆ Cons</li><li>- Potential negative publicity</li><li>- EPA oversees all cleanups</li><li>- EPA signs Record of Decision</li></ul> |
|--|--|

## NPL STATUS

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### Summary

- ◆ NBN to be "Proposed" in Spring/Summer
- ◆ 50 SWMUs added to list of sites needing cleanup
- ◆ Being on NPL will provide quicker cleanup of sites

**RELATIVE RISK SITE EVALUATION  
WITHIN THE DEPARTMENT OF  
DEFENSE**



**Naval Base, Norfolk Virginia  
Restoration Advisory Board Briefing  
21 March 96**

# What is Relative Risk Evaluation?



- Definition** The grouping of sites in the Defense Environmental Restoration Program into High, Medium, and Low categories based on an evaluation of site information using three factors: the contaminant hazard, the migration pathway, and the receptors
- It is**
- A common methodology for evaluating the relative risk posed by a site
  - A screening tool
  - An evolutionary instrument
  - A framework for dialogue with stakeholders
- It isn't**
- A way to avoid our legal agreements
  - A means of reducing our financial obligations
  - An abdication of our cleanup responsibilities
  - An absolute assessment of risk
  - A substitute for a health assessment

## Site Evaluation Framework is a Method for Placing Sites into Relative Risk Categories



*It evaluates source, pathway, and receptor relationships in:*

**Groundwater (human endpoint)**  
**Surface water (human and ecological endpoints)**  
**Sediment (human and ecological endpoints)**  
**Surface soils (human endpoint)**

*Based on:*

**Contaminant Hazard Factor (CHF)**  
*How high are contaminant concentrations relative to standards?*

**Migration Pathway Factor (MPF)**  
*Is the contamination moving or likely to move?*

**Receptor Factor (RF)**  
*Are there humans or sensitive environments affected or potentially affected by the contamination?*

# Benefits



## Benefits

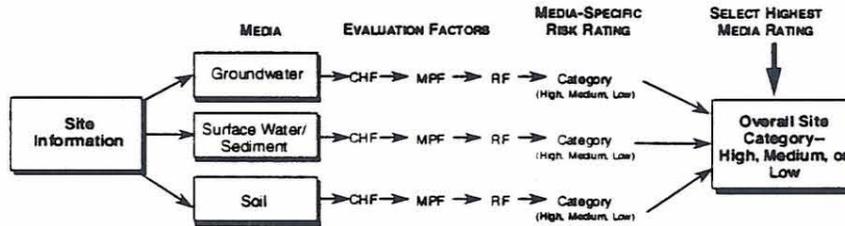
- The framework provides a common approach among DoD components for categorizing sites by relative risk
- The most urgent sites are identified so that resources can be focused on higher relative risk projects first
- The rating serves as a basis for dialogue with stakeholders on sequencing work at installations
- Periodic ratings serve as an indicator of progress in reducing relative risk

## Site Evaluation Factor Information for Groundwater

FACTOR	RATING	DEFINITION
Contaminant Hazard Factor (CHF)*	Significant	Sum of ratios [maximum concentration/standard] > 100
	Moderate	Sum of ratios [maximum concentration/standard] = 2 - 100
	Minimal	Sum of ratios [maximum concentration/standard] < 2
Migration Pathway Factor (MPF)	Evident	Analytical data or observable evidence indicates that contamination in the media is moving away from the source
	Potential	Possibility for contamination to be present at or migrate to a point of exposure; or information is not sufficient to make a determination of Evident or Confined
	Confined	Information indicates that the potential for contaminant migration from the source is limited (due to geological structures or physical controls)
Receptor Factor (RF)	Identified	There is a threatened or potentially threatened water supply downgradient of the source. The groundwater (contaminated or not) is a current source of drinking water or source of water for other beneficial uses such as irrigation/agriculture (equivalent to Class I or IIA aquifer)
	Potential	There is no potentially threatened water supply well downgradient of the source. The groundwater is potentially usable for drinking water, irrigation, or agriculture, but is not presently used (equivalent to Class IIB aquifer)
	Limited	There is no potentially threatened water supply well downgradient of the source. The groundwater is not considered a potential source of drinking water and is of limited beneficial use (equivalent to Class IIIA or IIIB aquifer, or where perched aquifer exists only)

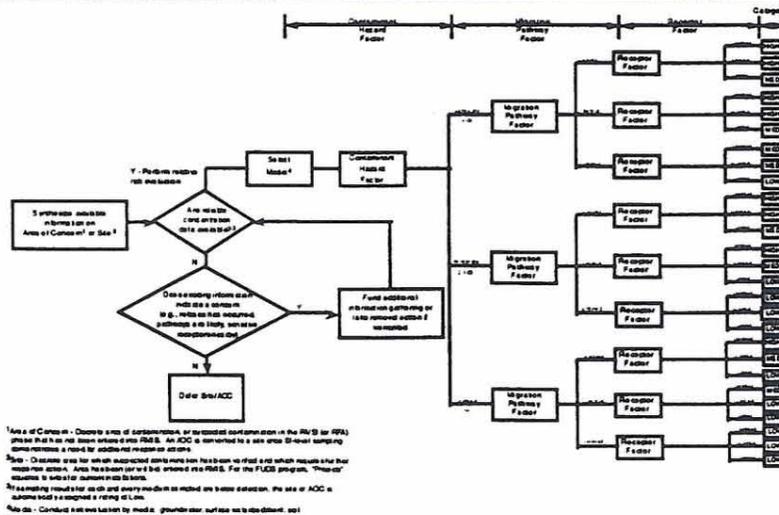
\*Evaluate using standards in Appendix B-1

# Structure of Relative Risk Evaluation Framework

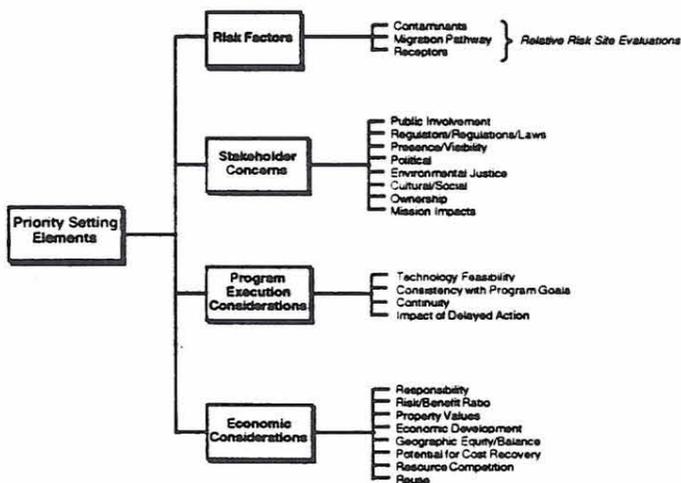


CHF = Contaminant Hazard Factor  
 MPF = Migration Pathway Factor  
 RF = Receptor Factor

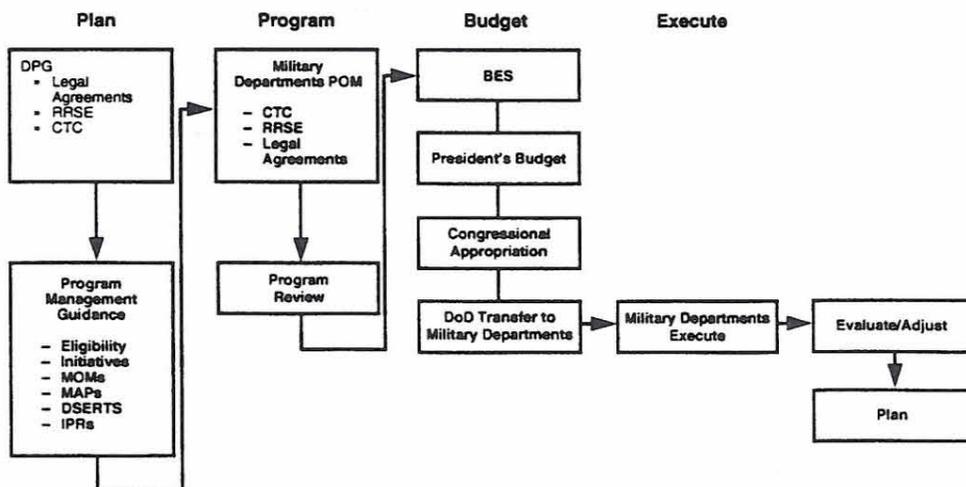
## Risk-Based Site Evaluation Framework: Decision Flowchart



# Relationship Between Relative Risk Site Evaluations and Other Risk Management Considerations



# DERP Planning, Programming, Budgeting, and Execution



# Relative Risk Site Evaluation within the Department of Defense Cleanup Program

## Outline

- Introduction
  - Origins of relative risk
  - Work group composition and products
- Description of framework
  - What it is and is not
  - Media and factors
  - Documentation
  - Example
  - Benefits
- Use of relative risk in program management
- Detailed descriptions of each relative risk factor

## Origin of Relative Risk within DoD



- DoD issued new Management Guidance for DERP on 14 April 1994
- Two new major policies
  - Restoration Advisory Boards (RABs)
  - Relative Risk Site Evaluation Concept

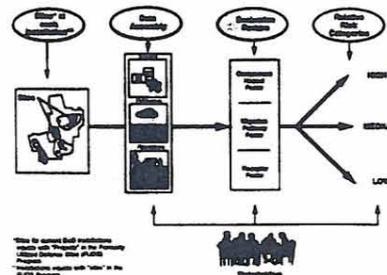
## Work Group Participants

- DoD
- Army
  - Army Environmental Center
  - Army Center for Health Promotion and Preventive Medicine
- Navy
  - Chief of Naval Operations
  - HQ Navy Facilities Engineering Command
- Air Force
  - HQ Air Force Environmental Restoration Program Directorate
  - Office of the Deputy Assistant Secretary of the Air Force
  - Air Force Institute of Technology
- FUDS
  - HQ and Omaha District U.S. Army Corps of Engineers (COE)
- Defense Logistics Agency
- HQ Environmental Protection Agency

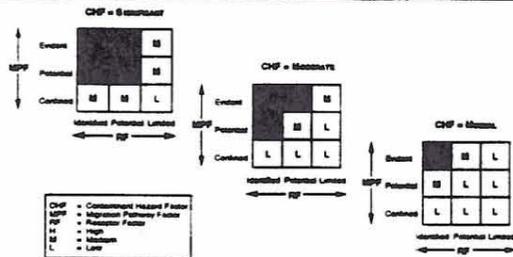
## Work Group Products

- Produced the DoD Relative Risk Site Evaluation Primer
- Developed DoD Question and Answer Fact Sheet, Progress Measurement Addendum, and response to EPA comments
- Produced the Interservice Relative Risk Site Evaluation Peer Review Report

## Relative Risk Site Evaluation Concept Summary



## Relative Risk Site Evaluation Matrix



## How is Relative Risk Evaluated?

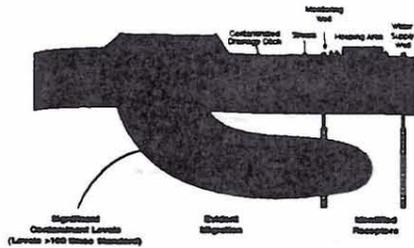


**Documentation** The *Relative Risk Site Evaluation Primer* is the primary source for direction. The *Relative Risk Evaluation Worksheet* in the *Primer* is used to record pertinent information on each site that is evaluated. Instructions in the *Primer* show how to fill out the *Relative Risk Evaluation Worksheet*. A stand-alone/executable computer program has been developed for conducting relative risk evaluations consistent with the *Primer*. Stakeholder input is obtained on project evaluations, where possible.

## Relative Risk Evaluation Example



High Relative Risk (Human) - Groundwater/Surface Water



## Requirements from Defense Planning Guidance

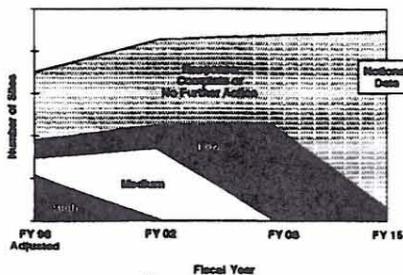


1. Complete relative risk evaluations at every Defense Environmental Restoration Account (DERA) and Base Realignment and Closure (BRAC) site by July 1995.
2. Implement actions that lower relative risk for all high relative risk sites in the DERA program by the end of FY 2002 or have remedial systems in place where necessary for these sites.
3. Implement actions that lower relative risk for all medium relative risk sites in the DERA program by the end of FY 2008 or have remedial systems in place where necessary for these sites.
4. Have remedial systems in place where necessary for all relative risk sites by the end of FY 2015.

## Measure of Merit #1: DERA Site Relative Risk Categorization

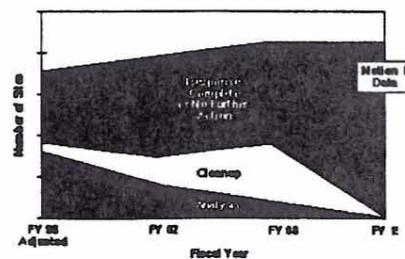


"The number of sites classified as high, medium, and low relative risk, and as response complete/no further action required."

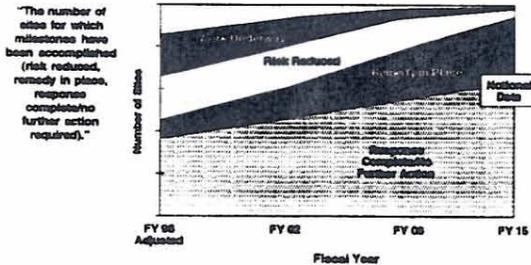


## Measure of Merit #2: DERA Site Phase Categorization

"The number of sites by phase category (analysis, cleanup, or RC/FA) of the restoration process."



## Measure of Merit #3: Relative Risk Reduction and Remedy in Place



## Results of Relative Risk Evaluations in DoD

Relative Risk	No. of Sites
High	3,301
Medium	1,571
Low	1,584
Not Evaluated	3,757
<b>Total</b>	<b>10,213</b>

6,456 (sum of High, Medium, and Low risk sites)

## Relative Risk Data Reports to Help Manage Cleanup Program

- Percentage of high, medium, and low relative risk sites in DoD and by service (FY98 baseline and in out years)
- Relative risk occurrences by environmental media (groundwater, surface water, sediment, soil; human and ecological endpoints)
- Relative risk as a function of National Priorities List (NPL) status or regulatory agreement status
- Costs associated with high, medium, and low relative risk sites
- Number of installations with 100 percent high relative risk sites

## Relative Risk Data Reports to Help Manage Cleanup Program (Concluded)

- Magnitude of CHF values (<2 to >5000)
- Predominant contaminants across DoD, by service, by installation
- Predominant site types for each relative risk category
- Costs associated with responses at various sites (e.g., specific site types or sites with specific contaminants)
- Other

## Contaminant Hazard Factor (CHF)

- Comparison of maximum project contaminant concentrations in each medium to Relative Risk concentration standards

$$CHF = \sum \frac{[\text{maximum concentration of A}]}{\text{Standard for A}}$$

- Three tiers
  - Significant = CHF > 100
  - Moderate = CHF of 2 - 100
  - Minimal = CHF < 2

## Standards for CHF Calculation

- Human health
  - Carcinogens = concentration that presents a 1 in 10,000 risk of increased cancer incidence
  - Non-carcinogens = the reference dose (equivalent to Hazard Quotient of 1)
- Ecological
  - Ambient Water Quality Criteria (AWQC) or EPA Lowest Observed Effects Levels in the absence of AWQC
  - Sediment screening criteria from National Oceanic and Atmospheric Administration (NOAA)

## Appendix B-1: Concentration Standards (For Human Endpoints)

- Apply to water and soil media
- Used in conjunction with potential or actual human exposures
- Derived from EPA Region IX Preliminary Remediation Goals (PRGs) with exception of military materials and radionuclides
- Military Materials standards are taken from [place holder for Army Report/citation]
- Radionuclide standards ("benchmarks") are taken from EPA's Superfund Chemical Data Matrix (SCDM) maintained as part of the Hazard Ranking System and from Argonne National Laboratory [place holder for citation]

## Appendix B-3: Concentration Standards (Ecological Endpoint)

- Apply to sediment medium
- Used in conjunction with potential or actual ecological exposures
- Based on NOAA Sediment Screening Values
- Values used represent concentrations that produced response effects in less than 5% of the observations

## Appendix B-2: Concentration Standards (Ecological Endpoint)

- Apply to surface water medium
- Used in conjunction with potential or actual ecological exposures
- Based on Aquatic Water Quality Criteria or the Lowest Observed Effects Level
- Fresh water and marine (use appropriate column)

## Mechanics of the CHF Calculation

Contaminants	Calculation*	Rating
Carcinogen A: [A] <sup>1</sup> max	$\frac{[A]_{max}}{SUF} + \frac{[B]_{max}}{SUF} + \frac{[C]_{max}}{SUF} = X_1$	$X_1 > 100 = \text{Significant CHF}$ $2-100 = \text{Moderate CHF}$ $< 2 = \text{Minimal CHF}$
Carcinogen B: [B] <sup>1</sup> max		
Non-carcinogen C: [C] <sup>1</sup> max		
Ecological D: [D] <sup>1</sup> max	$\frac{[D]_{max}}{SUF} = X_2$	

[A]<sup>1</sup> - Maximum concentration in media  
 SUF<sup>1</sup> - Standard based on 10<sup>-6</sup> human cancer incidence  
 SUF<sup>2</sup> - Standard based on Hazard Quotient of 1 for humans  
 SUF<sup>3</sup> - Standard for ecological receptors where available  
 \*Use concentration standards in Appendix B of Primer

Note: Contaminants posing a threat to ecological receptors (i.e., ecological contaminants) should be evaluated separately from those posing a threat to human receptors

## Mechanics of the CHF Calculation—Example\*

Contaminant <sup>1</sup>	Maximum Concentration (µM)	Standard (µM)
1,1-Dichloroethylene [carcinogen]	6.0	4.8
1,2-Dichloroethylene [non-carcinogen]	3.0	61.0
Vinyl Chloride [carcinogen]	3.2	2.0
Toluene [non-carcinogen]	16.0	720.0
Manganese [noncarcinogen]	10,700.0	100.0

**Calculation**  

$$\frac{6.0}{4.8} + \frac{3.0}{61} + \frac{3.2}{2.0} + \frac{16.0}{720} + \frac{10,700}{100} = 107.0$$

$107.0 > 100 = \text{Significant CHF}$   
 $107.0 > 2-100 = \text{Moderate CHF}$   
 $107.0 > < 2 = \text{Minimal CHF}$

\*Use Appendix A of Primer  
<sup>1</sup>Concentration Standard

## Mechanics of the CHF Calculation for Substances with both Carcinogenic and Non-Carcinogenic Effects

Contaminants	Calculation*	Rating
Carcinogen A: [A] <sup>1</sup> max	$\frac{[A]_{max}}{SUF} + \frac{[B]_{max}}{SUF} + \frac{[C]_{max}}{SUF} + \frac{[E]_{max}}{SUF} = X$	$X > 100 = \text{Significant CHF}$ $2-100 = \text{Moderate CHF}$ $< 2 = \text{Minimal CHF}$
Carcinogen B: [B] <sup>1</sup> max		
Non-carcinogen C: [C] <sup>1</sup> max		
Carcinogen/Non-carcinogen E: [E] <sup>1</sup> max		
Ecological D: [D] <sup>1</sup> max	$\frac{[D]_{max}}{SUF} = X_2$	

[A]<sup>1</sup> - Maximum concentration in media  
 SUF<sup>1</sup> - Standard based on 10<sup>-6</sup> human cancer incidence  
 SUF<sup>2</sup> - Standard based on Hazard Quotient of 1 for humans  
 SUF<sup>3</sup> - Standard for ecological receptors where available  
 \*Use concentration standards in Appendix B of Primer

Note: Contaminants posing a threat to ecological receptors (i.e., ecological contaminants) should be evaluated separately from those posing a threat to human receptors

## Mechanics of the CHF Calculation—Example 2\*

Contaminant <sup>1</sup>	Maximum Concentration (µM)	Standard (µM)
Cr <sup>6+</sup> (non-carcinogen)	1,300 µg/L	100 µg/L
Pb <sup>2+</sup> (non-carcinogen)	1,400 µg/L	4 µg/L
Cd <sup>2+</sup> (non-carcinogen)	120 µg/L	10 µg/L
Cr <sup>3+</sup>	800 ppm	60 ppm
Pb <sup>2+</sup>	300 ppm	35 ppm
Cd <sup>2+</sup>	10 ppm	5 ppm

$\frac{1,300}{100} = 13$	$\frac{1,400}{4} = 350$	$\frac{120}{10} = 12$	$13 + 350 + 12 = 375 = \text{Significant}$
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$\frac{800}{60} = 13.3$	$\frac{300}{35} = 8.6$	$\frac{10}{5} = 2$	$13.3 + 8.6 + 2 = 23.9 = 24 = \text{Moderate}$
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\*From Appendix A of Primer  
<sup>1</sup>Surface water media: human exposure  
<sup>2</sup>Soil: human exposure to produce

## Mechanics of Surface Water/Sediment Evaluation

- Summary of Relative Risk Evaluation possibilities

Receptor Estimate	Medium	Surface Water	Sediment
Human		CHF = Sum of Ratios using Appendix B-1 (water); MPF, RF	CHF = Sum of Ratios using Appendix B-1 (soil); MPF, RF
Ecologist		CHF = Sum of Ratios using Appendix B-2 (fish or invertebrates); MPF, RF	CHF = Sum of Ratios using Appendix B-2; MPF, RF

- Evaluate separately; take highest rating

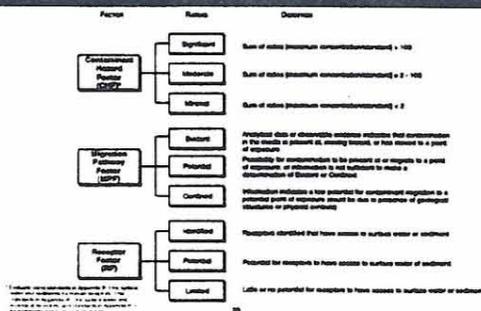
## Migration Pathway Factor (MPF)

- Each media pathway evaluated (groundwater, surface water/sediment, soil)
- Three tiers
  - Evident:** Contamination in media moving away from source
  - Potential:** Contamination in media could move downgradient; or information not sufficient to make determination of Evident or Confined
  - Confined:** Potential for contaminant migration from source is limited due to geological structures or physical controls
- Opportunity for input from regulators and community

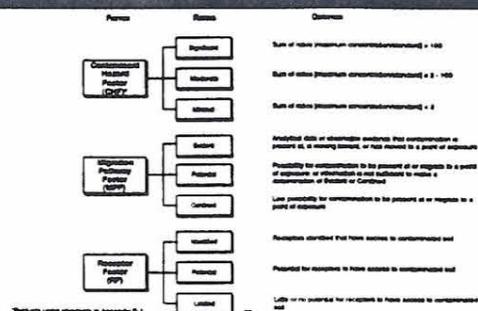
## Receptor Factor

- Receptors (human or sensitive ecological species/environments) evaluated for each media
- Three tiers
  - Identified:** Receptors are threatened or have access to potentially contaminated media
  - Potential:** Receptors are not threatened but have potential access to media of concern
  - Limited:** Receptors are not threatened or have little or no access to potentially contaminated media
- Opportunity for input from regulators and community

## Site Evaluation Factor Information for Surface Water/Sediment



## Site Evaluation Factor Information for Soils



# RELATIVE RISK SITE EVALUATION WITHIN THE DEPARTMENT OF DEFENSE



Naval Base, Norfolk Virginia  
Restoration Advisory Board Briefing  
21 March 96

1

## Relative Risk Ranking - DEFINITION

- Definition** The grouping of all sites in the Department of Defense into High, Medium, and Low categories based on an evaluation of site information using three factors: the contaminant hazard, the migration pathway, and the receptors
- It is**
- A standard method for evaluating the relative risk posed by a site
  - A screening tool
  - A framework for dialogue with stakeholders
- It isn't**
- A way to avoid our legal requirements
  - A means of reducing our financial obligations
  - A way to avoid cleanup
  - An absolute assessment of risk

2

# Relative Risk Ranking -METHODOLOGY

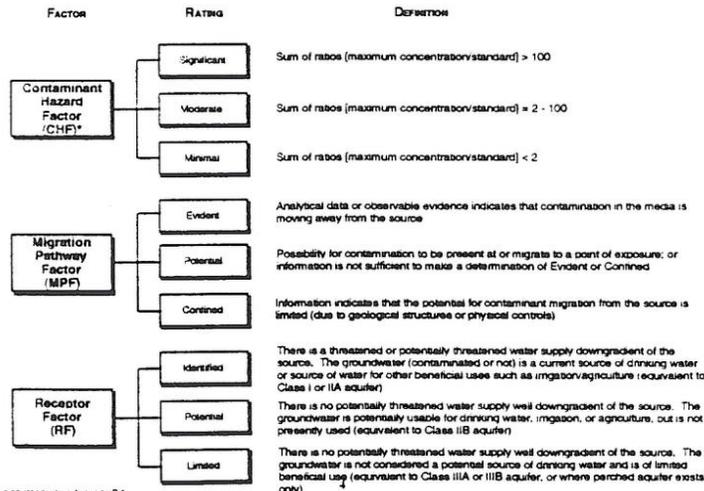
*It evaluates source, pathway, and receptor relationships in:*

- Groundwater (human endpoint)
- Surface water (human and ecological endpoints)
- Sediment (human and ecological endpoints)
- Surface soils (human endpoint)

*Based on:*

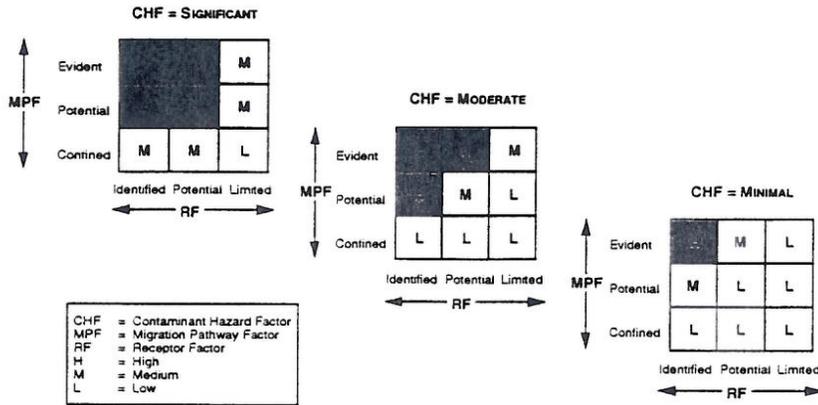
1. **Contaminant Hazard Factor (CHF)**  
*How high are contaminant concentrations relative to standards?*
2. **Migration Pathway Factor (MPF)**  
*Is the contamination moving or likely to move?*
3. **Receptor Factor (RF)**  
*Are there humans or sensitive environments affected or potentially affected by the contamination?*

# Relative Risk Ranking -Matrix -Groundwater Example



# Relative Risk Ranking

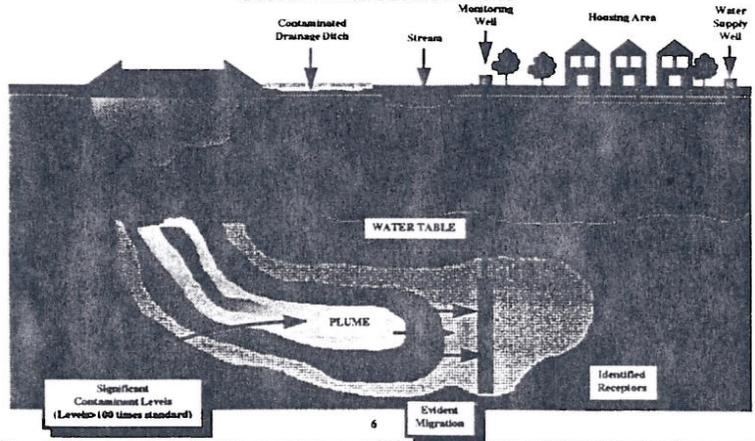
## -Evaluation Matrix



# Relative Risk Ranking

## -Evaluation Example

**High Relative Risk (Human)  
Groundwater/Surface Water**



# NAVY ENVIRONMENTAL BUDGET PROCESS



Naval Base, Norfolk Virginia  
Restoration Advisory Board Briefing  
21 March 96

7

## DERA BUDGET PROCESS

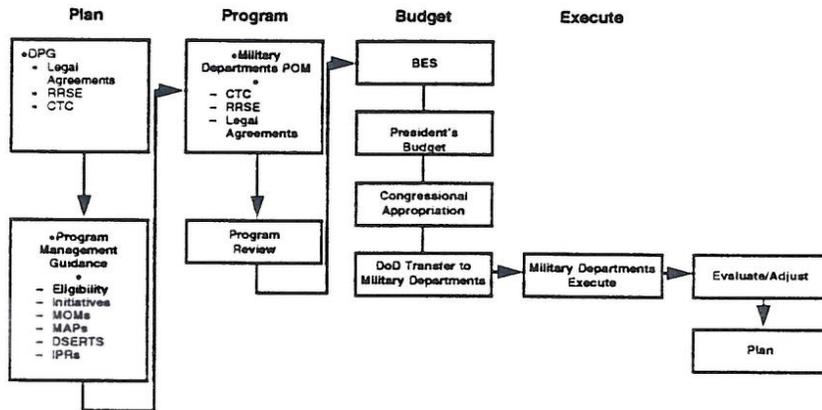
### -Planning Guidance

- Definition: **DERA** - Defense Environmental Restoration Account
- ➡ Complete relative risk evaluations at every Defense Environmental Restoration Account (DERA) and Base Realignment and Closure (BRAC) site by July 1995
- ➡ Implement actions that lower relative risk for all high relative risk sites in the DERA program by the end of FY 2002 or have remedial systems in place where necessary for these sites
- ➡ Implement actions that lower relative risk for all medium relative risk sites in the DERA program by the end of FY 2008 or have remedial systems in place where necessary for these sites
- ➡ Have remedial systems in place where necessary for all relative risk sites by the end of FY 2015

8

# BUDGET PROCESS

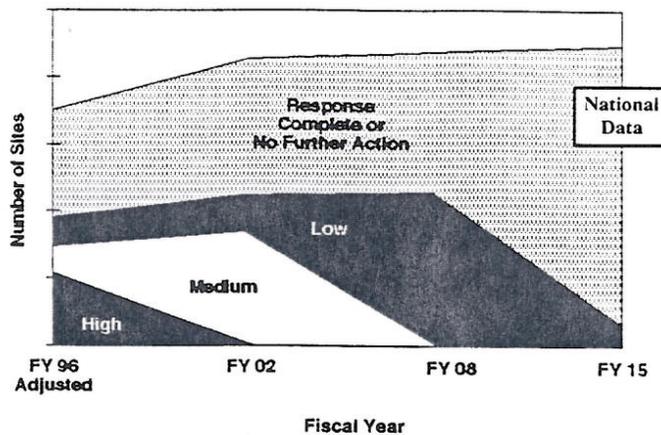
-DERP Planning, Programming, Budgeting, and Execution



# BUDGET PROCESS

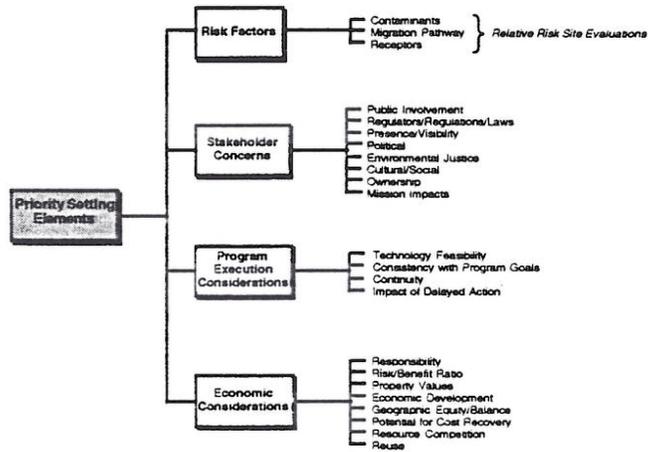
-DERA Site Relative Risk Categorization

"The number of sites classified as high, medium, and low relative risk, and as response complete/no further action required."



# BUDGET PROCESS

## -Risk Management Considerations



# NAVAL BASE SPENDING

- **1994** Spending (\$7,715,426)
  - Construction (\$6,975,403)
  - Study/Design (\$740,023)
- **1995** Spending (\$1,013,666)
- **1996** Spending Planned (\$3,626,553)



# BUDGET PROCESS

## -Risk Results in DOD

Relative Risk	No. of Sites	
High	3,301	} 6,456
Medium	1,571	
Low	1,584	
Not Evaluated	3,757	
<b>Total</b>	<b>10,213</b>	

## Defense Budget Process

### Glossary of Terms

<u>Acronvm</u>	<u>Full Name</u>
LANTDIV	Atlantic Divison of the Naval Facilities Engineering Command
EPA	Environmental Protection Agency of the United States
VDEQ	Virginia Department of Environmental Quality
DOD	Department of Defense
RRR	Relative Risk Ranking
DPG	Defense Planning Guidance (To be used to develop budget)
RRSE	Relative Risk Site Evaluation
CTC	Cost to Complete (Cost Estimate to Investigation and Cleanup)
MOMs	Measure of Merits (Special Individual Programs)
MAPs	Management Action Plans (Programs across several bases)
DSERTS	Defense Site Environmental Tracking System (System for tracking cleanup progress)
IPRs	In-Progress Reviews
BES	Budget Execution Summary

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