BRAC Talk

Environmental Base Realignment and Closure News

Fall/Winter 1996

BRAC TALK - A SUCCESS!

BRAC Talk - *A Success!* The first issue of *BRAC Talk*, released early this summer, was very well received both inside and outside of the Navy. We want to personally recognize and thank those people who have contributed material for the publication and the Naval Facilities Engineering Service Center for their efforts in putting together this newsletter. We encourage you to continue to submit material and ideas for future issues of *BRAC Talk* that will be coming out every four months.

A lot of things have happened since the inaugural issue of *BRAC Talk* only a couple of months ago. This past summer, we conducted our annual East and West Coast BCT (BRAC Cleanup Team) Seminars, which were attended by over 250 environmental professionals. (See BRAC CLEANUP TEAM SEMINARS, Page 8). Revised Fast Track Cleanup Guidance (18 May 1996) was issued by the Deputy Under Secretary of Defense (Environmental Security) and our BRAC-95 BCTs are working hard to submit their initial BRAC Cleanup Plans (BCPs) by 1 November 96. In addition to the requirement for a Navy BCP Abstract, there is a new requirement for submittal of a DoD BCP Abstract, for all BRAC-88, 91, 93, and 95 BCTs, to the Under Secretary of Defense (Acquisition and Technology) by 29 November 1996. In order to meet this requirement in a most effective and timely manner, the latest release of the electronic BCP Abstract Program was modified to collect data once and allow generation of both abstracts from the same database. In this way, we hope to facilitate the continued development of quality products by the BCTs to meet our customers' needs.

We continue to support and have an ongoing commitment to enable the use of less expensive, more cost effective, and potentially expedient technologies for the remediation of contaminated soil and groundwater within the Navy's environmental program including our efforts in support of BRAC. This is reinforced by a recent directive that was issued by EPA's Office of Solid Waste

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Port Hueneme Facility Completes Accelerated Cleanup

By Lee H. Saunders

The U.S. Navy achieved an environmental cleanup milestone in May 1996 when the oceanfront home of the former Naval Civil Engineering Laboratory (NCEL) in Port Hueneme, California completed regulatory cleanup requirements. The property is now ready for turnover to the local community.

In a letter dated May 20, 1996, the California Environmental Protection Agency's Department of Toxic Substances Control stated that the laboratory's six cleanup sites required no further action. The decision was based on the agency's review of the Navy's final removal action close-out report. The agency also conducted routine on-site observations during the cleanup process.

"This is the first BRAC Navy base in California with soil and groundwater contamination that has met all the regulatory requirements for environmental cleanup and complete and unrestricted transfer to the public." said Todd Margrave, Southwest Division Naval Facilities Engineering Command (SWESTDIV) Remedial Project Manager for NCEL.

Partnerships between Engineering Field Activity (EFA) West and regulators contributed to the accelerated cleanup schedule. Cleanup goals were established in accordance with site specific preliminary remediation goals identified through risk assessments. This was a result of negotiations with the Los Angeles Regional Water Quality Control Board (RWQCB) regarding cleanup of petroleum-impacted sites.

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BRAC TALK-A SUCCESS!

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and Emergency Response (OSWER) for their programs involving initiatives to support environmental technology development and commercialization. The directive encourages reasonable risk taking and support in using new technologies on the part of EPA regional and headquarters managers. In that spirit, and where it makes sense to do so, we should continue to facilitate the implementation of innovative technologies within our program that can be more cost-effective, provide a higher or more effective level of performance, and/or accelerate the cleanup of our contaminated sites.

Another item of note that affects the BRAC Environmental Program is language that amends Section 120(h)(3) of CERCLA in Section 334 of the FY 1997 Defense Authorization Bill ("Authority to Transfer Contaminated Federal Property Before Completion of Required Response Actions"), which was recently agreed to by House and Senate Conferees and signed by the President. We will be looking for opportunities that allow us to take advantage of these provisions in the FY97 Defense Authorization Bill and that present a win-win scenario for the federal government and the local community. Further guidance will be forthcoming on how the Department of Defense and the Navy can transfer contaminated federal property in support of expediting reuse and economic revitalization using these new provisions.

One last reminder that it is important to share the successful efforts and valuable lessons learned with other BCTs to take advantage of our experience in meeting the goals of the BRAC Environmental Program. *BRAC Talk* is one of the ways we can do this and material from the BCTs is meant to be the cornerstone of the newsletter. If you have any comments, material, or recommendations for future issues, please feel free to provide them so that we can maximize the benefits of the newsletter to you and the BRAC Environmental Program.

Mr. Joe Graf, Executive Editor NAVFAC 41JG, (703) 325-6431 or DSN 221-6431.

Port Hueneme

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The former NCEL is located approximately 60 miles northwest of Los Angeles and 40 miles southeast of Santa Barbara in Ventura County. The 33 acre laboratory served as a Navy engineering research laboratory for the development and testing of maritime equipment and materials.

NCEL was selected for realignment in 1993 through the federal government's military facilities closure program called BRAC (Base Realignment and Closure). On October 1, 1993, NCEL was merged with the Naval Energy and Environmental Support Activity to form a new command called the Naval Facilities Engineering Service Center (NFESC). NFESC moved to the Naval Construction Battalion Center Port Hueneme in April 1996. The former laboratory property will transfer to the city of Port Hueneme and the Oxnard Harbor District in the future.

The six sites at NCEL were a former storage yard, a former boiler plant, and four underground storage tank sites. The storage yard housed salvage materials and hazardous waste such as paints, gasoline, diesel fuel, hydraulic fluids, transformer fluids, solvents and industrial cleaners. Contaminants such as motor oils were found in the soils at the former boiler plant site. The soils at the four underground storage tank sites were contaminated with motor oils and other hazardous chemicals such as xylene and ethylbenzene.

Approximately 2,866 tons of contaminated soil were removed. The removed soil was transported to a treatment center in Maricopa, California for bioremediation. Bioremediation reduces the contaminated soil to a harmless, non-toxic material suitable for landscaping, structural fill, backfill, and paving parking surfaces.

OHM Remediation Services of San Diego was the civilian contractor that performed the $830,000 cleanup. SWESTDIV coordinated the cleanup.

"This cleanup is a great example of how the BRAC process worked." Jim Bray, SWESTDIV BRAC environmental coordinator for NCEL said. "This cleanup and transfer would not have been completed successfully without the community, the Restoration Advisory Board, the state and federal regulators, and the Navy working together.

SWESTDIV in San Diego, commanded by Captain Mike Johnson, Civil Engineer Corps, U.S. Navy, manages a fiscal year 1996 environmental cleanup budget of over $200 million for over 600 sites at 38 Navy and Marine Corps bases in Arizona, New Mexico, and Southern California.

This article was based on a press release written by Lee H. Saunders. Mr. Saunders is the Environmental Public Affairs Officer at Southwest Division, Naval Facilities Engineering Command, (619) 532-3100, DSN 522-3100. Information was also taken from the article "Accelerated Cleanups at Port Hueneme" in the Spring 1996 issue of CleanSweep, News on EFA West's Environmental Cleanup Actions, Al Fung, Editor (415) 244-2517.

NFESC

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"You must be working on BRAC"

Lessons Learned from the San Francisco Bay Area

By Dean R.Wolf, R.A., and William E. Oswood

"The information is right here somewhere on my desk," I told the caller. He said, *"You must be working on BRAC."* I was surprised that he guessed correctly. He explained that everyone he encounters who is involved with BRAC (Base Realignment and Closure) has a messy desk, himself included.

The cluttered desk provides an analogy for me and my co-author's experiences following the third round BRAC announcement in March 1993. Despite months of responding to seemingly endless BRAC data calls, few of us at Navy Public Works Center San Francisco Bay were prepared for the intense activity and compressed time frames that followed the announcement.

Context

In March 1993, the Secretary of Defense nominated most of the San Francisco Bay Area naval complex for closure. The Defense Base Closure and Realignment Commission voted to close Naval Shipyard Mare Island, Naval Air Station Alameda, Naval Station Treasure Island, Naval Hospital Oakland, Naval Aviation Depot Alameda, and our command, Navy Public Works Center San Francisco Bay (PWCSFB). PWCSFB is scheduled to close in April 1998.

Implementing BRAC commission recommendations required us to assume numerous roles—including: Commander, Naval Base San Francisco's planning staff; owner of utility systems, houses and other facilities at each of the closing bases; owner of the geographically separate, Department of Defense Housing Facility in Novato, California, also marked for closure; service provider to bases not closing; and the job of planners for the $350 million BRAC expansion at Naval Air Station Lemoore, California.

Lessons Learned

From our experience with the 1993 San Francisco Bay Area BRAC we learned how important it is to organize and staff the Base Closure Planning Office. Other lessons include:
Skilled management is essential to control time and resources in the months following the BRAC announcement.
Well-written planning documents appreciate in importance as the closure progresses.
Interrelating data records save time in the later stages of the closure process.
Military construction (MILCON) documentation is more difficult than normal.
Budget support is a critical initial function of the base closure plan.
Bases affected by BRAC face similar issues, whether closing or gaining bases.

Benefits of BRAC Plan

For closing bases, the benefit of a good base closure plan lies in the tools and resources it provides to effectively manage the drawdown. For gaining bases, the benefit of a good BRAC plan lies in preserving opportunities for additional growth (which can readily accommodate new or expanded missions) after the BRAC facilities are constructed.

Organization and Staffing

San Francisco Bay area bases originally took one of two approaches to BRAC planning. Some commands set up base closure offices with a full-time staff. Others assigned base closure planning responsibilities as collateral duties.

It turns out that BRAC management is not well served as a collateral duty task. The bases with full-time staffs got a fast start and developed comprehensive planning data. These closure teams found gaps in the local BRAC scenarios and resolved questions that might not have otherwise been uncovered. All closing bases now have a full-time staff in their closure offices. Because of the variety of roles required of a BRAC staff, a BRAC office might include some or all of the following personnel:

- Program analyst
- Workload analyst
- Budget or financial analyst
- Facilities planner
- Personnel analyst

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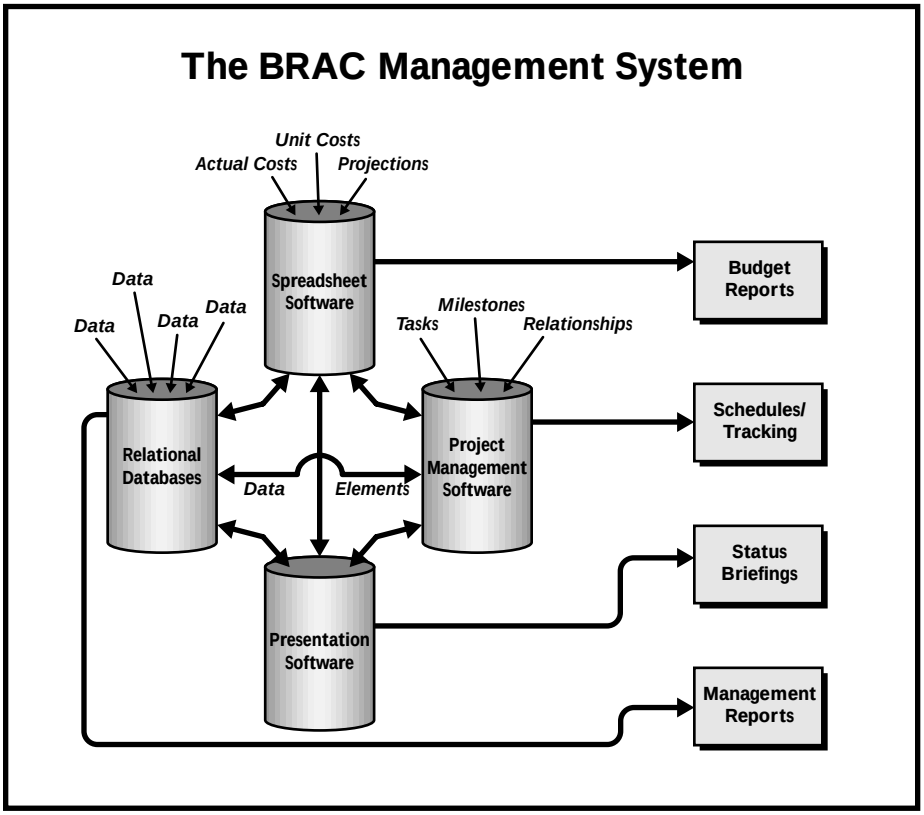


- Plant property account specialist
- Environmental advisor
- Utilities systems planner
- Housing planner
- Legal advisor
- Mapping specialist
- Computer programmer
- Presentation coordinator
- Editor

Time Management

For senior managers, the BRAC announcement triggered an avalanche of time demands. Higher commands needed immediate information—and lots of it. The task of providing this information fell on key command personnel who were not easily diverted from their usual work responsibilities.

Closure planning required extensive new information as well as an update on existing internal mission planning. At first, BRAC was a moving target. The milestones frequently changed as schedules and relationships were refined.

In addition, there were demands on time from outside the chain of command. Base commanders were called upon to provide educational information to the media and nearby communities. At the same time, DoD's Office of Economic Adjustment (OEA) representatives needed information to become familiar with the installation and the nearby communities. OEA's representatives needed this information because they provide funds to communities impacted by base closure. OEA's first information resource is the local base commander.

Well-Written Plan

Our experiences show that the base closure plan report's value is in the continuity it provides. Almost none of the original personnel who were involved in preparing our plan are still around. All of the senior officers and many of the civilians who participated in developing the plan have either retired or moved on to new positions. The continuity of the Bay Area base closure effort relies on how well new Navy managers implement their predecessors' ideas.

Organizing and editing the closure plan pays off. The concepts of a *concise and well-written plan* stand a good chance of being assimilated throughout the chain of command.

We received appreciative comments from the Washington, D.C. level about the clarity of the San Francisco Regional BRAC Coordination Plan. We believe that the extra effort we put into a well-written plan sharpened our thinking and helped gain support for our drawdown efforts and budget.

Data Management

A controlled and simple data management system saves time and becomes ever more important as the base closure progresses. Information management can be a nightmare if data is not integrated or the system is poorly organized. It is useful to establish a data dictionary to ensure consistent terminology between data bases—otherwise, usefulness of the extensive data developed for BRAC is limited.

Starting with the data calls, various degrees of expediency are built into the BRAC resource data. No one responding to data calls has the time to rebuild data bases, or restructure the existing records. Consolidating and simplifying data should be a priority soon after the closure announcement is made.

To simplify BRAC management you need an interrelated system of command-wide relational data bases, integrated with spreadsheets, presentation, and project management software. We are now folding a variety of data sources into a central BRAC information system. Ideally, statistical data should be supplemented by electronic drawing and mapping programs. We are also identifying personnel and property on building plans, which will help track their location through the drawdown and closure period.

MILCON Documentation

In BRAC 93, the MILCON data forms (DD-1391s) were the last planning elements to be completed. Preparation times were short, and the BRAC MILCON documentation process contained extra steps.

Through the initial budget submission period, closing commands were responsible for preparing the MILCON documentation. This work, however, relied heavily on information available only from the receiving bases. And,

although the receiving command later assumed responsibility for all MILCON programming, the original project estimates were already in the system.

Segregating the BRAC from non-BRAC impact proved tricky, particularly when the receiving activity already had a similar project, such as an unfunded child care center. In contrast to the quickly made initial decision, the auditor's later reviews were often painstakingly detailed. We developed existing as well as proposed base loadings at the gaining activity to help clarify the BRAC-only impacts. Later in the process, we prepared annual base loadings during the multi-year move-in period to justify the timing and size of facility projects.

Once the BRAC-only scope was identified, we screened each project again to assure that the new facility would be no larger than the facility being replaced (regardless of condition) at the losing activity.

The Naval Facilities Engineering Command required full MILCON documentation regardless of the number of BRAC projects at a base. In response, we developed automated forms on spreadsheet software to expedite the documentation workload. Automated DD-1391 forms, back-up estimates, and basic facility requirements worksheets helped improve the productivity of our engineering and planning staff. Using these systems, PWCSFB and Engineering Field Activity West identified sites and prepared MILCON documentation for more than 50 BRAC projects at a single gaining base.

Budget Support

Is budget support the primary or secondary function of a base closure plan? Arguments are valid for both positions. However, if the closure budget projection is inadequately supported, another round of closure plan revisions is likely. As with MILCON documentation, we found that budget projections required more thorough back-up than under normal conditions. The finality of closure leaves little room to make up for funding shortfalls.

Gaining Bases

Gaining bases must address many of the same issues faced by losing bases. Fortunately, a planning system and support structure already exists for the gaining bases. The similarities between BRAC planning for losing and gaining bases include:

- Bases that dedicate full-time resources to BRAC have more comprehensive plans.
- The additional workload falls on key command personnel, and the deadlines are short.
- Local communities look to the base for information about the BRAC impacts.
- A well-written plan clarifies and informs about how the base could expand without foreclosing its options for future growth.
- Productivity improvements in preparing MILCON project documentation benefits all bases.
- BRAC planning reports support the budget request.
- The interrelated data bases save time when planning and managing base expansion.

Conclusion

Force restructuring and realignment will be part of the military mission over the next decade. We found that organizing early helps manage the process, whether it involves new construction or drawdown and closure.

WHO WANTS WHAT

Type of Information	Navy	DOD Office of Economic Adjustment	Community
Cost of closure	X		
Coordination and sequence of proposed move	X		X
Military readiness during move	X		
Base profile		X	X
Reuse potential of land and facilities	X	X	X
Closure schedule	X	X	X
Process for transfer of assets	X		X
Impact funds required		X	X
How to obtain impact funds			X
Copies of presentations		X	X
Environmental concerns/constraint areas	X		X
Utility data	X		X
Historical structures, areas, or settings	X		X

When this article was written, Dean Wolf was a community planner in the Base Closure Office of the Navy Public Works Center San Francisco Bay, Oakland, California. He is now working in environmental compliance at PWC. Dean's phone number is (510) 302-5482, DSN 672-5482. William Oswood is the director of the Business Strategies Department at PWC San Francisco Bay, which includes the Base Closure Office.

EPA Helps Tackle Nation's Largest Environmental Problem

Accelerating Cleanups at Federal Facilities Through Teamwork, Innovation, and Community Involvement

by Deborah L. Tremblay

When thinking about environmental problems, contaminated Federal property usually isn't the first image that comes to mind. People often associate contaminated sites with big, industrial, private companies. As such, many people are surprised to learn that the Federal government has enormous environmental problems of its own.

Due to years of dedication to Cold War activities, environmental issues took a back seat to the pressing needs of national security. As a result, thousands of Federal facilities are contaminated with hazardous waste, unexploded ordnance, and a variety of other toxic contaminants. The Department of Defense (DoD) is responsible for more than 21,000 potentially contaminated sites. The Navy accounts for about 4,000 of the DoD sites. The Department of Energy (DOE) has more than 10,000 sites, and the Department of Interior (DOI) more than 26,000. There are also challenges facing other Federal entities, though to a lesser extent.

While the sheer number of contaminated sites may seem overwhelming, the potential cost of cleaning them up is staggering. Current estimates indicate that it will cost about $30 billion to address DoD's sites, between $200 and $350 billion to address DOE's sites, and between $4 and $8 billion to address DOI's sites.

As one can imagine, there is a pressing need for the U.S. government to take a highly organized and focused approach to tackling environmental problems at Federal facilities. In response to this need, there is a unique and innovative program within the U.S. Environmental Protection Agency (EPA) which is doing just that.

"EPA has changed and continues to improve the way business is done at Federal facilities by developing partnerships, fostering innovation, and promoting public participation."
Jim Woolford, Director,
EPA/Federal Facilities
Restoration and Reuse Office

EPA's Federal Facilities Response Program is working with DoD, DOE, and other Federal entities to help them develop creative, cost-effective solutions to their environmental problems. By focusing on teamwork, innovation, and public involvement, EPA is improving environmental cleanup, while protecting and strengthening the conditions of human health, the environment, and the national economy.

Partnerships for Fast-Track Cleanup

To move cleanups forward, EPA is assisting DoD in furthering the goals of President Clinton's Fast-Track Cleanup Program. The Fast-Track Cleanup Program accelerates cleanups and speeds the economic recovery of communities affected by closing military bases.

A major success of this program is the formation of Base Realignment and Closure (BRAC) Cleanup Teams at 108 fast-track installations. BRAC Cleanup Teams (BCTs) have marked a new way of doing business for the government. The teams, which include DoD, EPA, and state agency representatives, engineer common-sense approaches to cleanups by developing common goals and priorities up-front. This streamlined approach promotes immediate decision-making and rapid resolution of conflicting priorities. It is estimated that, in the first two years of this new way of doing business, BCTs have eliminated nearly 90 years of cleanup process time and saved more than $100 million.

For instance, a BCT at Fort Devens, Massachusetts streamlined its cleanup by working with the local community. By integrating a number of initial investigations, the Fort Devens BCT expedited the assessment of environmental conditions at the base. This approach eliminated four years of environmental study and saved an estimated $5 million.

At the Sacramento Army Depot in California, a BCT facilitated the use of an innovative cleanup technology, air sparging, which enabled the property to be transferred to the private sector in months, rather than years. Packard-Bell relocated its world headquarters to the former installation and created more than 3,000 new jobs.

To further assist with Fast-Track Cleanup, EPA fosters public participation by working with DoD to establish Restoration Advisory Boards (RABs) at military installations. RABs foster teamwork by bringing members of the community together with military officials and government regulators to discuss cleanup issues raised by reuse options. Not only have RABs been established at most BRAC bases, there are over 150 additional RABs at other DoD installations nationwide, with many more being formed.

Maximizing Innovation

In addition to the Fast-Track Cleanup Program, EPA has formed partnerships with non-BRAC components of DoD, DOE, DOI, and other Federal agencies. To optimize the results of teamwork and partnering, EPA is working to develop new, streamlined approaches to dealing with problems at Federal facilities. For example, EPA has accelerated the cleanup of similar types of sites by developing "presumptive remedies." Presumptive remedies are preferred technologies for common categories of sites based on historical patterns of remedy selection. Their use enables site managers to limit the number of technologies considered, focus data collection, and streamline site assessment, resulting in time and cost savings.

"Streamlined oversight" is another process which provides non-traditional relief to resource intensive oversight. As opposed to traditional oversight methods, EPA is now moving to tailor the level of regulatory oversight at a facility to correspond with the complexity of its environmental problems. Rather than applying similar requirements for oversight to all sites, streamlined oversight uses streamlining concepts and tools to reduce time frames and save money.

Along with streamlined oversight, EPA has worked to improve the cleanup process by promoting innovative technologies for site assessment and remediation. Innovative technologies have the ability to make cleanups faster, more effective, or less costly. Examples of innovative technologies include bioremediation, soil venting, and land farming. To spread the word on these technologies, EPA chairs the Federal Remediation Technologies Roundtable, a working group of senior officials from federal agencies involved in the development and use of innovative technologies. Since its inception six years ago, the Roundtable has served as an excellent platform for inter-agency cooperation to advance innovation.

Involving People in Decisions Which Affect Them

Experience has shown that cleanups improve at Federal facilities when local stakeholders share information and become involved in environmental decision-making.

To this end, EPA works with numerous Federal, state, local, and tribal governments; environmental groups; labor organizations; and community groups.

Visit EPA's Federal facilities home page at http://www.epa.gov/swerffrr/ to learn more about the program and download current documents. An electronic calendar lists upcoming meetings and conferences. All parties are welcome to add relevant events to the calendar.

During the coming year, EPA is supporting workshops nationwide which will educate communities about their role in the Federal facilities cleanup process. These workshops will provide a means for implementing the recommendations of the Federal Facilities Environmental Restoration Dialogue Committee, an EPA-sponsored advisory committee composed of 50 members representing diverse viewpoints.

To promote environmental justice, EPA works to ensure that low-income and minority communities have every opportunity for public participation. For example, EPA supports Citizens for Environmental Justice. This organization is designing and implementing strategies that enhance partnerships among affected communities, governments, environmental organizations, historically black colleges and universities, tribal colleges, and Hispanic institutions.

EPA also works closely with the Association of State and Territorial Solid Waste Management Officials (ASTSWMO). ASTSWMO is a national organization of waste managers at the state level that focuses on information-sharing and working collectively to solve environmental problems.

To further strengthen partnerships at military bases, EPA supports the efforts of the National Association of Attorneys General (NAAG) to accelerate cleanups. NAAG is researching legal issues and improving cooperation between EPA, DoD, and states.

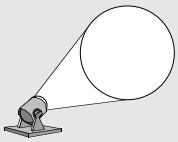
And, to examine the role of local governments in Federal facility cleanups, EPA is funding a cooperative agreement with the International City/County Management Association (ICMA). The final report of this cooperative venture is due later this year; however, preliminary work indicates that both EPA and local governments have much to gain by partnering and working as a team.

Many Challenges Ahead

While EPA has made tremendous progress in tackling the Federal government's environmental problems, the challenges of tomorrow lie ahead. The breadth and scope of existing environmental problems at Federal facilities are growing larger as an increasing number of releases are becoming evident. At the same time, the funding available to environmental programs at the Federal level is decreasing.

In the coming years, EPA will have to continue to adapt to the dynamic conditions which exist. New ways of doing business will be even more critical to meeting environmental goals. Fortunately, to meet the challenges ahead, EPA is continuing to change the way it does business today by strengthening existing partnerships, further streamlining clean up, and getting more return on each dollar spent.

Deborah Tremblay is an environmental engineer at EPA where she promotes innovative technologies, fosters agency partnering, and coordinates public outreach. Her phone number is (202) 260-8302.



HIGHLIGHTS

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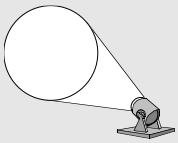

EPA's CERCLA AND RCRA TRAINING FOR BRAC FAST TRACK INSTALLATIONS

In July, EPA conducted a pilot course to present an overview of how CERCLA and RCRA statutes, regulations, and policies can be applied to effectively address restoration and reuse issues at BRAC installations. Approximately 120 attendees from DoD, EPA and the State regulatory agencies took part in the training with the target audience being newly assigned BCT members with little experience (i.e. BRAC-95 and new BECs). Presentations covering the following topics were given as part of the pilot course:

- Overview of Superfund and NCP
- Removal Response Authority
- EPA's Regulatory Role at Non-NPL sites
- Preparing Removal Action Memoranda
- Removal Action Case Study (Fort Sheridan)
- RCRA and UST Programs
- Pesticide Releases at Golf Courses
- RI/FS
- Data Validation and Quality Assurance Project Plans
- Risk Assessment/Methodology
- Geo-technical Requirements
- Remedy Selection Process
- Cleanup Standards in Absence of Planned Reuse
- RD/RA Process
- Comparing Removal and Remedial Processes
- RCRA Corrective Action
- RCRA/CERCLA Integration

Response from personnel attending the training was favorable and DoD is presently exploring additional joint training opportunities for personnel involved in the Fast Track Cleanup Program. Ideas as to additional training that would be of value to the BRAC Environmental Program are welcome. Please provide any feedback or ideas to the NAVFAC HQ point of contact: Mr. Joe Graf, NAVFAC 41JG, at (703) 325-6431 or DSN 221-6431.

NEW AUTHORITY TO TRANSFER PROPERTY BEFORE COMPLETING REMEDIATION

On 23 September 1996 the President signed the FY97 Defense Authorization Act which contains a provision (Section 334) that modifies CERCLA 120(h)(3) to allow contaminated federal real estate to be transferred to private parties before remedial action has been taken. This authority provides an opportunity for the Department of Defense (DoD) to assist communities in expediting the reuse of closing military installations although it also presents certain challenges in properly structuring the arrangement. Until we have final implementing guidance, a 24 September DUSD(ES) Memo permits the Services to explore the use of this new authority with Restoration Advisory Boards, Local Redevelopment Authorities, and others in consultation with DUSD(ES) on a case-by-case basis.

The objective of Section 334, "Authority to Transfer Contaminated Federal Property Before Completion of Required Response Actions", is to facilitate reuse of contaminated federal property and to eliminate disparate treatment between public and private sector transfers of contaminated property. The provisions of this legislation allow deferral of the requirement that a deed contain a covenant warranting that all remedial action necessary has been taken as follows:

EPA Administrator, with concurrence of the Governor, may defer the requirement for NPL property.
Governor may defer the requirement for non-NPL property.

The standards for this deferral must include that the property is suitable for intended use, intended use is consistent with protection of human health and the environment, the Federal Agency has provided adequate notice for at least 30 days, and deferral and transfer will not delay necessary response action. Assurances with respect to necessary response actions may include: restrictions on use to ensure protection of human health and the environment; restrictions on use to ensure that remedial investigations, response action, and oversight activities will not be disrupted; assurance that necessary response action will be taken; schedules for investigation and completion of necessary response action, as approved by the appropriate regulatory agency, are identified; and the Federal Agency will submit budget request to OMB that adequately addresses schedules, subject to Congressional authorizations and appropriations. Upon completion of necessary response actions, warranty will be executed and delivered to the transferee which shall satisfy the requirement of Section 120(h)(3).

DoD is working closely with EPA and the Services to revise Fast-Track Cleanup Guidelines to ensure effective implementation of this provision consistent with protection of human health and the environment. We anticipate that a draft implementation plan/ guidance will be available for comment in mid to late November 1996.

NAVFAC HQ point of contact for additional information is Mr. Joe Graf, NAVFAC 41JG, at (703) 325-6431 or DSN 221-6431.

BRAC CLEANUP TEAM SEMINARS

The Naval Facilities Engineering Command again sponsored BRAC Cleanup Team (BCT) Seminars on each coast this year. The East Coast BCT Seminar was held 9-10 July in Charleston, SC and the West Coast BCT Seminar was held 30-31 July in Newport Beach, CA. An optional third day was also added to each seminar to take advantage of an opportunity to host the Bioremediation Innovative Technology Seminar being sponsored by the Naval Facilities Engineering Service Center. This year marked the third consecutive year that these seminars were held on each coast for our Navy and Marine Corps BRAC Cleanup Teams. The seminars were attended by over 250

environmental professionals involved in the Department of Navy BRAC Environmental Program. Participants included Navy, Marine Corps, EPA (Headquarters and Regions), State regulatory agencies, Army, Air Force, Department of Energy, U.S. Geological Survey, U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration, academia and community representatives to name a few. The format was adjusted to provide additional time for breakout sessions and areas of interest identified by the BCTs in planning of this year's seminars. Some of the areas covered during this year's seminars included:

- Unexploded Ordnance
- Landfills
- Budget
- Future Land Use
- Geographic Information Systems
- Intrinsic Bioremediation
- Funding and Project Priorities
- Risk Communication
- Lead Based Paint
- Ambient/Background Levels
- Expedited Site Characterization & Technologies
- Risk Management
- Strategic Planning and Geostatistics
- Interagency Partnering
- "Green" Technologies
- Data Quality Objectives
- Rational National Standard Initiatives
- Restoration Advisory Boards
- Field Analytic Techniques
- Site Closure Documentation

Although Hurricane Bertha was an uninvited attendee, did not pre-register, and put a bit of a damper on things for the east coast, both BCT Seminars were considered a great success. Both the NAVFAC Southern Division and Southwest Division are commended for the outstanding jobs they did in hosting this year's seminars. We at NAVFAC Headquarters were very pleased with the quality and enthusiasm displayed by the Navy and Marine Corps BCTs. It is not too early to start thinking about next year's BCT seminars. One primary goal, which has been strongly supported by comments on the seminar evaluation sheets yet has eluded us in implementation, is to have more presentations made by the BCTs instead of Washington level folks. As in the past, we strongly endorse this idea and again encourage BCTs to select a success story, lesson learned, or topic and volunteer to present it as a case study to the other Navy and Marine Corps BCTs at next year's seminar. Input from the BCTs and other personnel involved in BRAC Environmental is invaluable to the continued success of the program and these annual seminars. We will continue to request your ideas on how we can improve the quality of the seminars and demonstrate the progress being made in the BRAC Environmental Program. For more information on this year's seminars or to provide ideas/suggestions for next year, please contact Mr. Joe Graf at (703) 325-6431, DSN 221-6431, or internet email address *jgraf@hq.navfac.navy.mil.*

OSD/NAVY BRAC COMMUNITY CONFERENCE

On 19-21 November in La Jolla, California, the OSD (Office of the Secretary of Defense) Office of Economic Adjustment (OEA) and the Navy will be co-hosting the annual conference for Base and Community representatives of BRAC-88, 91, 93, and 95 bases. The purpose of this conference is to provide an update on issues and procedures related to implementation of BRAC, with particular emphasis on base redevelopment. The conference will offer Navy and Community leaders a constructive environment to exchange ideas, meet their counterparts, and interface with OSD/Navy decision makers. In addition, it will include in-depth training with regard to redevelopment issues (i.e. interim leasing, caretaker operations, methods of real and personal property conveyance, etc...).

The conference will consist of both general sessions and a series of workshops that will allow time for questions and answers with the subject matter experts. Panel discussions by experienced Navy and Community personnel will also be included. The conference is open to major claimant representatives, commanding officers, and their base closure implementation personnel. OEA has extended invitations to civilian leaders of affected communities. Contractor personnel are not invited. Look for highlights from the conference in the next issue of BRAC Talk.

NAVFAC HQ Environmental point of contact for additional information is Mr. Joe Graf, Code 41, at commercial (703) 325-6431 or DSN 221-6431.

Field Screening at Treasure Island

Naval Station Treasure Island (NSTI) is scheduled to close in September 1997. Immunoassay field tests were used extensively at NSTI to guide the Phase IIB Remedial Investigation (RI). Immunoassay field tests allow data to be analyzed faster and for less money than sending samples to an analytical laboratory. To confirm the effectiveness of the immunoassay field tests as a screening tool, EFA West compared the immunoassay field tests to the off site analytical laboratory test results at the first site investigated. It was found that the site's characteristics must be known in advance to tailor the immunoassay tests to the requirements of the investigation. The information gathered by EFA West at NSTI can be used at Navy installations across the country.

Immunoassay test kits were used to screen over 2,000 samples collected with the Geoprobe for total petroleum hydrocarbons (TPH), polynuclear aromatic hydrocarbons (PAH), and benzene, toulene, ethylbenzene, and xylenes (BTEX). Immunoassay tests are run in the field office the day after samples are collected. The results are available within 24 hours rather than weeks with an analytical laboratory. Since the results were immediately available, additional sampling locations could be quickly identified and the field investigation accelerated.

Sampling was focused on specific chemicals of concern rather than a broad spectrum of analytes, allowing more locations to be sampled to more accurately delineate the extent of contamination.

The immunoassays were used at a majority of the sites investigated during the Phase IIB RI. At least 20% of all samples were sent to the off site analytical laboratory for confirmation. By field screening the other 80%, approximately $1 million in analytical costs were saved.

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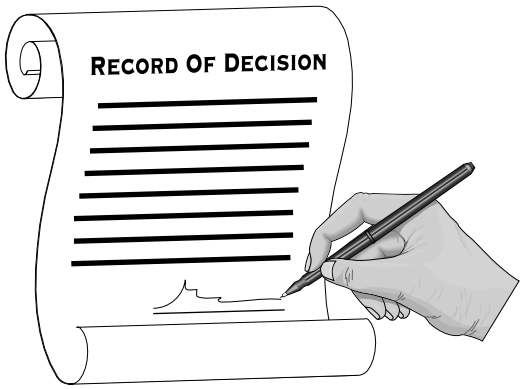
Record of Decision Signed at Hunters Point Annex



Hunters Point Annex closed in October 1994. A Record of Decision (ROD) for the Hunters Point Annex (HPA) Parcel A has been successfully signed. Plans are underway for transfer of the property to the City of San Francisco. This ROD is an agreement between the Engineering Field Activity (EFA) West, the United States Environmental Protection Agency (EPA), the California EPA (Cal/EPA) and the California Regional Water Quality Control Board (CRWQCB). After months of investigation, these agencies agreed with EFA West that Parcel A needs no further cleanup.

HPA is located on a promontory in southeast San Francisco. HPA covers 936 acres, of which 493 are on land and 443 under water. To facilitate the environmental investigation and remediation, and ultimate transfer of the property, HPA was divided into several parcels (Parcels A through F). This ROD addresses the remedy for sites at Parcel A.

Parcel A covers approximately 88 acres and is bound by the other portions of HPA and the Bayview-Hunters Point District. Under the San Francisco Redevelopment Agency's current land-use plan, reuse of Parcel A will include residential areas and light commercial businesses.

EFA West and EPA Region IX have selected no action for the following sites at Parcel A:

IR-59: The groundwater underlying Parcel A

IR-59: Jerrold Avenue Investigation (JAI): The soil at a residential lot on Jerrold Avenue within Parcel A

These two sites are the only sites at Parcel A that were carried through to the Remedial Investigation (RI) stage. The first site studied groundwater and found no potential use as a water supply. It does not meet the municipal supply criteria as defined by the single well supply criteria in the San Francisco Bay Regional Water Quality Board Resolution No. 89-39 (incorporation of "Sources of Drinking Water Policy"). The second site studied the soil. The concentrations of hazardous substances in the soil are either within or below EPA's acceptable risk levels and metals are at ambient levels.

All other sites investigated at Parcel A were determined by the EFA West, EPA, and Cal/EPA to require no action at the conclusion of the Site Inspection (SI) stage of the investigation. In selecting no action for the RI sites, the Navy has determined that the overall condition of Parcel A is protective of human health and the environment.

The following three documents need to be completed prior to transfer of Parcel A to the City of San Francisco. These are:

The Environmental Baseline Survey:
It will summarize the present environmental condition of Parcel A.

The Finding of Suitability for Transfer (FOST):
This will declare the property ready for transfer.

Joint Environmental Impact Statement/Environmental Impact Report:
The Navy, in coordination with the City and County of San Francisco is preparing a document on the disposal and proposed reuse of the HPA property.

These documents are scheduled to be completed soon. Congratulations again to the dedicated efforts of EFA West, EPA, Cal/EPA, CRWQCB and the community in achieving this significant accomplishment!

Note these other actions at HPA:

Approximately 5,000 tons of sandblast grit was collected throughout HPA and sent to an asphalt plant to be recycled.

Hazardous waste materials are being removed from the pickling and plate yard project site.

Soil and associated groundwater below the former location of the HPA tank farm were investigated in 1993. Pilot treatability studies for soil contamination are now in progress.

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NOAA Assists Northern Division BRAC Installations

The closure of bases, acceleration of remedial activities, and the reduction in environmental funding provide impetus to optimize limited resources. Together with the sensitivity, biological significance, and commercial value of coastal habitats surrounding naval installations, these factors underscore the need to accurately and quickly evaluate the environmental risk posed by hazardous waste sites on these installations and to develop cost-effective remedies. DoD is authorized by DERA to "enter into agreements on a reimbursable basis with any other Federal agency to obtain the services of that agency to assist ... in carrying out any ... responsibilities." Therefore, DoD can solicit co-trustee agencies' specialized technical expertise to assess ecological risk and remedial alternatives.

Under a recently signed agreement, the Coastal Resource Coordinator Branch (CRCB) of the National Oceanic and Atmospheric Administration (NOAA) is extending to Northern Division of Naval Facilities Engineering Command (NAVFAC) the benefits of over a decade of experience in evaluating natural resource issues at Superfund sites. NOAA provides NAVFAC project managers the technical support they require to evaluate the environmental soundness of methods proposed to investigate naval installations; to develop remedial action decisions and plans; and ultimately, to restore impacted environments. Base Realignment and Closure (BRAC) installations taking advantage of our expertise include Davisville Naval Construction Battalion Center and the Philadelphia Naval Complex. Northern Division installations on the National Priorities List (NPL) included in the agreement are New London Naval Submarine Base, Portsmouth Naval Shipyard, Newport Naval Education and Training Center, Willow Grove Naval Air Station, and Mechanicsburg Naval Inventory Control Point.

NOAA's CRCB is delegated the trustee authority for receiving notification of releases by a lead agency, coordinating on investigations and assessments; and cooperating with co-trustees. NOAA's network of Coastal Resource Coordinators (CRCs), in all eight EPA regions with coastlines, have helped project managers evaluate complex natural resource concerns and make environmentally sound yet cost-effective decisions. CRCs regularly deal with competing interests and have become skilled in negotiating solutions to satisfy multiple needs. NOAA CRCs have earned a reputation as credible technical advisors and are supported by an interdisciplinary team of scientists in Seattle, Washington.

Funding is provided by Military Interdepartmental Purchase Request (MIPR) to NOAA for the following specific activities at Northern Division installations:

- assist DoD in scoping work plans, developing ecological risk assessments guidelines and designs, and determining the severity of risk posed to natural resources from site releases;
- evaluate criteria and standards to determine appropriate final clean-up requirements as they relate to coastal resources to mitigate adverse impacts;
- ensure remedial effectiveness, monitoring, and performance requirements are conducted appropriately;
- identify alternatives for mitigation or compensation elements, as part of the remedial process, for past or residual natural resource injuries and help develop restoration plans;
- help communicate results or issues involving coastal resources to interested parties; and,
- participate in Base Closure Teams or Restoration Advisory Boards.

Providing technical liaison among NOAA, the U.S. Navy, and EPA under this agreement is ensuring that the best scientific information is available for remedial decision making.

Michael Buchman is the Defense Natural Resource Coordinator and primary contact for CRCB, at (206) 526-6340 or at MFB@hazmat.noaa.gov.

Regulatory Closure After Innovative Technology Remediation

From EPA Groundwater Currents of June 96 (EPA-542-N-96-003) Issue #15

At the Lawrence Livermore National Laboratory (LLNL) in Livermore, California, environmental regulatory agencies have concurred that remediation of gasoline contaminated soil above the water table is complete. This is the first formal regulatory closure of a non-excavation cleanup activity at the Laboratory's Livermore site since cleanup began in 1988. A relatively inexpensive innovative technology known as Dynamic Underground Stripping was used to clean up 7,000 gallons of gasoline that leaked into the ground from an underground gasoline storage tank a number of years ago. Researchers from LLNL and the University of California (UC) at Berkeley teamed up to demonstrate a unique and new combination of technologies that comprise Dynamic Underground Stripping. The process employs vapor extraction during underground steaming and electrical heating. The heat is applied by steam and electricity to vaporize trapped contaminants in the soil.

Once vaporized, the contaminants are removed by vacuum extraction. The processes are monitored and guided by underground imaging. Dynamic stripping removed most of the gasoline (7,000 gallons) in only nine months of active time and at a cost of $11 million for treatment and the supporting research. It is estimated that the same cleanup would now cost $6 million over six months. This is in contrast to excavation biodegradation that would have taken a year and cost about $30 million. Pump and treat activities have been estimated to take 200 years at this site with cost ranging from $20 million to $60 million.

The U.S. EPA, the California Department of Toxic Substances Control and the California Regional Water Quality Control Board-San Francisco Bay Region concluded that soil cleanup efforts above the water table at the site of the gasoline spill were no longer necessary and that the soil remediation efforts have met or exceeded "Applicable or Relevant and Appropriate Requirements" as stated in the Livermore Site Record of Decision agreed to by the regulatory agencies in 1992. Cleanup of contaminated groundwater continues.

For more information, contact Albert Lamarre, Lawrence Livermore National Laboratory, at (510) 422-0757.

GIS at Alameda

Operational closure of Naval Air Station (NAS) Alameda is scheduled for September 1997. NAS Alameda has direct access to Installation Restoration (IR) data through an easy to use Geographic Information System (GIS). GIS technology is being used as a highly efficient database management and data presentation tool to accommodate the ever growing large volume of IR data, including chemical analysis from over 3,000 water, soil, and sediment samples. GIS is a computer based system for compiling, analyzing, and displaying spatial data such as the locations of monitoring wells, sewer pipelines, and land parcels for lease or sale and integrating these spatial features with attributes such as chemical concentrations, lithology, and lease restrictions.

For NAS Alameda, the query station application was developed to quickly establish GIS querying capabilities so users wouldn't need extensive GIS training. Using an intuitive graphical interface, the query station application provides icons and menus that help the user build complex queries without learning cryptic command line syntax. The application allows Engineering Field Activity (EFA) West to browse through the data and display selected features and attributes in both graphic and tabular formats in adjacent windows. For instance, the user can select base map and sampling locations to be displayed, query and display the distribution of chemical concentrations such as trichloroethene (TCE) in groundwater, calculate basic statistics, zoom and pan across the map, display an aerial photograph of the installation as a backdrop, and create hard copy maps and tables of the queried data. Independently, the user can browse through the data and compare numerous scenarios quickly and easily.

This application has been installed at NAS Alameda and provides both EFA West and its regulatory partners direct access to the data. With this technology available, hydrologists, chemists, toxicologists, ecologists, and engineers can browse through the data, iteratively change query parameters, and view the results in a graphic format.

This GIS application was designed to incorporate additional data anticipated in the future, such as Environmental Baseline Survey (EBS) information. The Navy has already begun to lease some NAS Alameda property. Each time property is leased or sold, the condition of the property must be documented. A centralized GIS database containing both IR and EBS data will help facilitate this process and expedite both cleanups and the turnover of parcels.

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