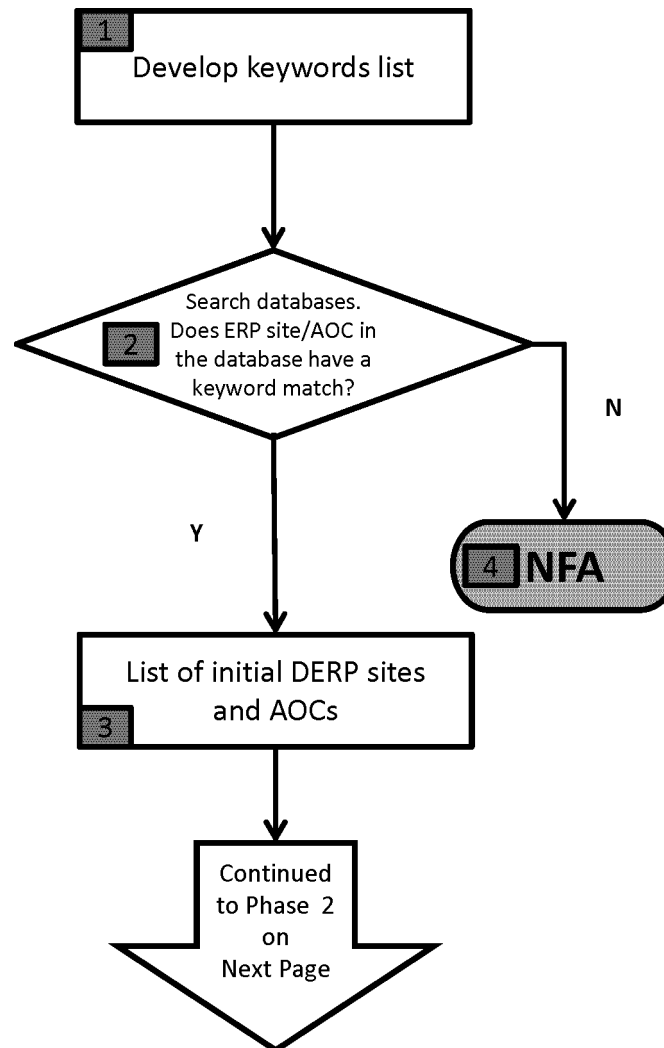


PFC DERP Site and AOC Identification, Validation, Prioritization, and Response Process

Phase 1 – Initial DERP Site Identification Database Screening

- Develop list of keywords related to use of PFCs (including AFFF and other specified keywords)
- ER Program (ER,N & BRAC) Databases (NORM, NIRIS, Delayed Disposal Report, Military Fire & Crash Training Sites Table, BRACMIS, GPRA, Flash Card, NOSC.Net, and Other Databases)

Status/Schedule:
COMPLETE



Business Rules:

- Block 1: Develop a list of keywords to perform an initial screening of ERP (ER,N and BRAC) databases. Keywords provide a broad range of sites/AOCs that have the potential for PFC use or release.

Keywords include but not limited to single or combinations of these words: fire crash training, burn area, plating shop, fire train, fire fight, firefight, burn, hangar, AFFF, foam, plating.

- Block 2: The ERP database search will develop an initial “universe” of potential evaluation areas [existing ERP sites (NORM) or AOCs (NIRIS, other databases)].
- Block 3: Any ERP site/AOC in the databases with a keyword match will be included as a potential PFC evaluation area for further screening.
- Block 4: ERP sites/AOCs in the databases having no keyword matches will be excluded from further PFC use/release evaluation.

PFC DERP Site and AOC Identification, Validation, Prioritization, and Response Process

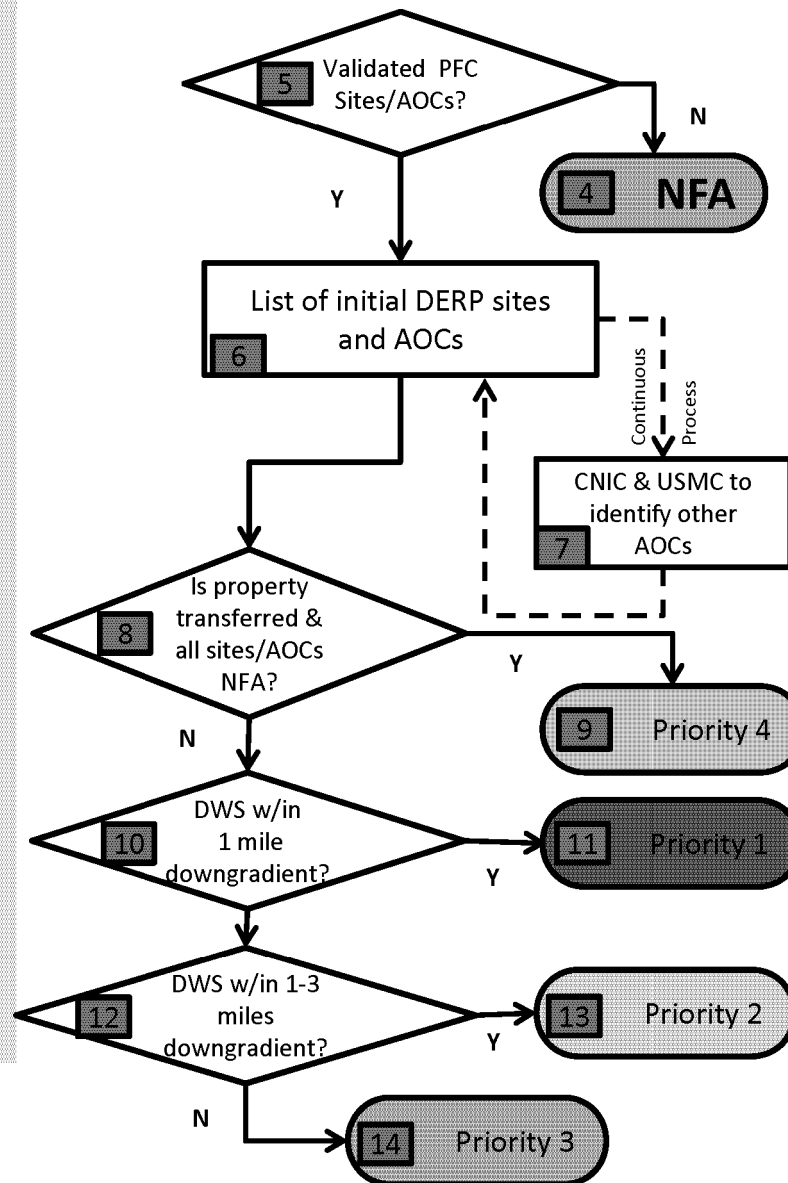
Phase 2 – Site/AOC Validation, Prioritization and Gap Analysis

- Managers and RPMs to validate sites/AOCs progressing from Phase 1
- Prioritize sites/AOCs based on property ownership status, response status, and distance to drinking water sources
- CNIC and USMC to review validated sites/AOC lists per installation with potential release mechanisms and identify additional sites/AOCs for prioritization
- May include limited sampling of groundwater.

Status/Schedule:

- Block 6: Initial list is due 1 June 2016 to DASN(E)
- Block 7: A continuous process; initial validated AOCs to be added to the list by 15 July with additional sites added as discovered.
- Blocks 11, 13, 14, and 9: Initial list is due 31 July 2016 to DASN(E)
- Additional AOCs from CNIC & USMC will be prioritized as they are identified.

Continued
to Phase 3
on
Next Page



Business Rules:

- Block 5: FEC RPMs to confirm/refute PFCs sites/AOCs based on available data on site history and site operations. RPM is to provide the supporting documentation of “negative” response. For example, a “burn pit” site/AOC for debris disposal and not associated with fire-fighting training can be eliminated. Because some of the required information pertains to on-base and off-base drinking water sources, the RPM will need to coordinate with Environmental Compliance, Public Work, and local municipalities.
- Block 7: Additional areas that have the potential for PFC releases will be identified by facility operations personnel (i.e. hanger, crash site, storage area). Coordinate and work closely with RPMs to identify and validate new AOCs.
- Block 8: Could be identified from NORM, NIRIS, Delayed Disposal Report, Military Fire & Crash Training Sites Table, BRACMIS, GPRA, Flash Card, real estate, & other databases
- Block 10: DWS (Navy, public, and private wells) are located within 1 mile downgradient of sites/AOCs.
- Block 12: DWS (Navy, public, and private wells) are or may be located within 1 - 3 miles downgradient of sites/AOCs.
- Blocks 9, 11, 13, and 14: Refer to rules under Phase 3.

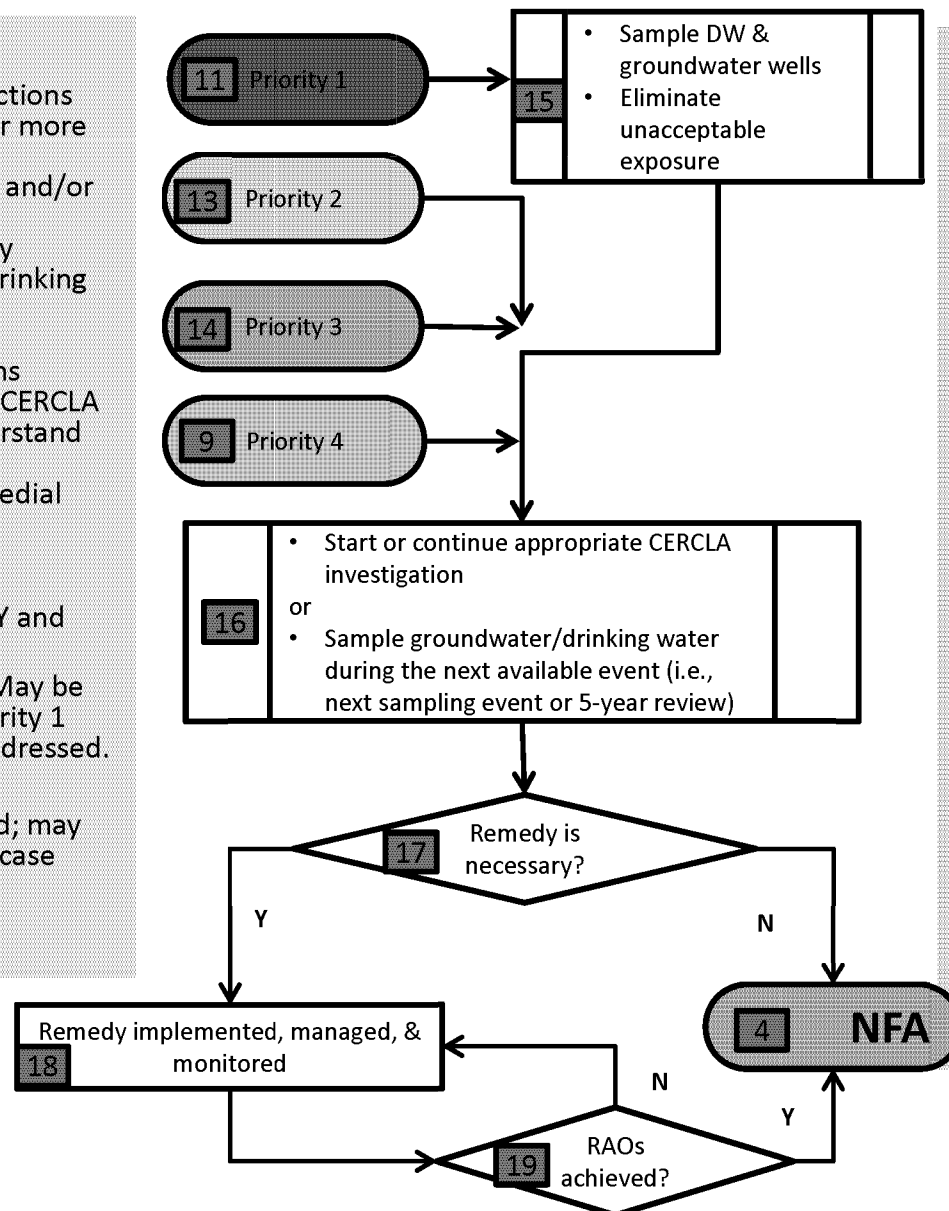
PFC DERP Site and AOC Identification, Validation, Prioritization, and Response Process

Phase 3 - Responses

- Layout prioritization of actions which may include one or more of the followings:
 - Sample groundwater and/or drinking water wells
 - Eliminate exposure by providing alternate drinking water
 - Perform other time critical/interim actions
 - Perform appropriate CERCLA investigation to understand the CSM
 - Perform CERCLA remedial action, if necessary

Status/Schedule:

- Block 11: Immediate (CFY and FY+1)
- Block 13: FY+1 to FY+3; May be expedited only after Priority 1 Sites/AOCs have been addressed.
- Block 14: FY+3 to FY+5
- Block 9: FY+5 and beyond; may be expedited on case by case basis, in particular when requested by the regulators/stakeholders.



Business Rules:

- Block 11: PRIORITY 1 – Perform actions per Blocks 15 and 16 and perform time critical actions as necessary.
- Blocks 13 and 14: PRIORITY 2 and PRIORITY 3 – Perform actions per Blocks 15 and 16.
- Block 9: PRIORITY 4 - PFC evaluation pending additional review by ASN/NAVFAC HQ and regulatory request for assessment and may proceed to Blocks 15 and 16.
- Blocks 15 and 16: Develop a CSM to understand GW flow, PFCs migration potential off-base, and aquifer characteristics. This information may be obtained using existing and/or new MWs to verify the presence and level of PFCs in GW. If these results indicate impact to the DWS (downgradient and greater than 1 mile away), the DWS should be sampled with additional “step-out” sampling, if necessary. Next step is to initiate the CERCLA site investigation to define nature and extent of the PFC contamination, evaluate risk, and develop remedial alternatives, if necessary. Consider implementation of a removal action to implement a short-term solution to eliminate the use of bottled water.

PFC DERP Site and AOC Identification, Validation, Prioritization, and Response Process

Acronyms:

AFFF	Aqueous film-forming foam
AOC	Area of concern
BRAC	Base Realignment and Closure
BRACMIS	BRAC Management Information System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFY	Current fiscal year
CNIC	Commander Navy Installations Command
CSM	Conceptual site model
DERP	Department of Defense Environmental Restoration Program
DW	Drinking water
DWS	Drinking water system
ER,N	Environmental Restoration, Navy Account
ERP	Environmental Restoration Program
FEC	Field Engineering Command
FY	Fiscal year
GPRA	Government Performance and Results Act
HQ	Headquarters
MW	Monitoring well
NAVFAC	Naval Facilities Engineering Command
NFA	No further action
NIRIS	Naval Installation Restoration Information Solution database
NORM	Normalized database; used for ER,N and BRAC accounts budgeting
NOSC.Net	Navy On-Scene Coordinator; NAVSEA-hosted database to track releases
PFC(s)	Perfluorinated chemical(s)/compound(s)
RPM	Remedial Project Manager
USMC	United States Marine Corps