

NALEMP GUIDANCE & IMPLEMENTATION

The Native American Lands Environmental Mitigation Program (NALEMP) was developed in 1996 by the Department of Defense (DoD) to address environmental issues from past DoD activities on Indian lands, including Alaska Native Claims Settlement Act (ANCSA)-conveyed lands and Native allotments. The program provides a unique opportunity for Native communities to not only address impacts from past DoD activities on their lands, but also to develop their own environmental programs and expertise.

PROTECTING PEOPLE & LANDS / PRESERVING CULTURE & VALUES

Unlike many other environmental programs, NALEMP takes into consideration potential impacts on traditional cultures, such as the disruption of a Tribe's subsistence activities, in addition to health and safety issues.

NALEMP typically funds the removal of hazardous materials on Native-owned lands, including:

- Abandoned drums, old equipment, and debris
- Unsafe buildings and structures
- Unexploded ordnance.

UNDERSTANDING NALEMP

Bristol understands the NALEMP process and can help guide your tribe through each step to successfully implement mitigation goals on Native lands.

One of the initial tasks under this program—and the first step to obtaining funding—is the preparation of the Strategic Program Implementation Plan (SPIP). The SPIP is the long-term planning document for mitigation of former DoD sites that impact a Tribe's economic, social, or cultural welfare.

Further steps in the NALEMP process include:

- Site Discovery – Identification of potential impacts
- Site Assessment – Collection & review of available information
- Project Selection – Selection of projects for funding
- Partnering – Consultation with DoD to identify the appropriate response
- Mitigation – Implementation of response activities.

WORKING WITH NATIVE LANDS

As a 100% Alaska Native-owned Company, Bristol Environmental Remediation Services, LLC, has a unique understanding of concerns particular to Tribal and Alaska Native entities. The Bristol Alliance of Companies has worked on ANCSA lands, Native allotments and Tribal lands in Alaska and across the nation at remote locations for more than a decade. We are sensitive to issues of cultural and economic



Bristol Operations Manager Patricia Curl trains two Village of Iliamna residents in sampling techniques.

importance to indigenous peoples. Bristol understands the importance of Native peoples taking stewardship of their lands and we are proud to take a supporting role.

BRISTOL SERVICES

Bristol's remediation services include a full range of site assessment and characterization tasks, as well as remediation planning and implementation. Bristol utilizes local labor and subcontractors whenever possible at all our Native lands remediation projects; we understand the importance of providing employment and training opportunities. Bristol's experience working with numerous environmental programs to mitigate damage to Native lands has included a range of activities, including:

- Unexploded ordnance removal from culturally significant lands in Hawaii
- Nationwide remediation of leaking underground storage tanks at 12 reservations (EPA Contract)
- NALEMP project sites throughout Alaska.

The following projects illustrate our experience guiding Native Tribes through the NALEMP process and implementing innovative mitigation solutions.

GULKANA VILLAGE COUNCIL

In 2007, the Gulkana Village Council of Gulkana, Alaska, contracted with Bristol to assist in obtaining NALEMP funding to clean up affected Native lands. Bristol conducted record searches, interviews with elders, and a site visit to identify potential impacts for NALEMP funding and to prepare the SPIP.

Together, Bristol and the Village Council identified five sites of concern comprising approximately 50 acres of Native land that contained unsafe structures, as well as surface and buried debris and potential areas with buried drums from past military operations. For each site, Bristol determined the primary concern, ownership, military impact and proposed action, and tabulated approximate cost of cleanup.

Within the SPIP, Bristol prepared the following information for each site of concern:

- Site description and location
- Description of any previous investigations
- Field activities conducted, samples collected and analytical results
- Potential receptors and exposure routes
- Tribal value and importance.

VILLAGE OF ILIAMNA

From 2004 through 2007, the Village of Iliamna, Alaska, contracted with Bristol to assist with potential NALEMP projects. In 2004, Bristol conducted record searches, interviews with elders, and a site visit to identify potential impacts eligible for NALEMP funding and to prepare the SPIP. Working together, Iliamna and Bristol determined that two drum and debris sites between 40 and 50 years old posed a safety hazard and had the potential to impact the community's health and the environment. The Village of Iliamna sought a cleanup and closure plan that would preserve Native culture in the Iliamna area and provide employment opportunities for the Iliamna Native people.

In 2005, with Bristol as subcontractor, the Village of Iliamna conducted a site investigation/removal action. To that end, Bristol undertook the following activities and innovative field solutions:

- Identified the potential existence of buried drums at four sites through geophysical surveys (electromagnetic surveys that quickly and efficiently identify buried metal debris).
- Sampled soil, surface water, and sediment.
- Removed and crushed 1,349 drums and cleaned contaminated drums. (Of the drums removed, 162 contained petroleum hydrocarbon product residue. Utilizing local labor, those drums were pressure-washed and cleaned prior to crushing.)



Work at Iliamna included the removal of old drums at two sites.



When the Village of Iliamna subcontracted site investigation/removal activities to Bristol, one important goal was to provide employment opportunities to Native Iliamna people, such as the members of this work crew.

- Addressed potential for additional contamination by carbon-filtering drum rinse before discharge to the land.
- Disposed contaminated filters and petroleum hydrocarbon product in containment drums for safe storage and disposal.

In 2006, the Village of Iliamna, with Bristol as a subcontractor, conducted additional removal actions to clean up a second drum dump located on Tribal land. The Alaska Department of Environmental Conservation issued a closure letter on September 20, 2007 confirming that the cleanup is complete and no further action is required.

For more on Bristol's NALEMP services, please contact Operations Manager Patricia Curl at pcurl@bristol-companies.com or 907-743-9309.



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