

**APPENDIX D**  
**PROJECT JUSTIFICATION GUIDANCE**

- A. Each activity must include a narrative description of the project as justification for funding the project. The narrative may be placed in the “Narrative” or in the “Comments” fields of the EPR software. This justification is reviewed by activity, claimant, and N45 personnel..
- B. Each justification should include a minimum of three items: the regulatory driver, a project description and a cost breakdown.
1. Regulatory Driver: The activity should indicate details of which Federal, state, local regulation or Navy policy is driving the project or recurring cost. Whenever possible cite the specific law/regulation (example: CA State law AB2588). If the requirement is local, indicate the organization that is the appropriate authority (air pollution control district, sanitation district, etc.)
  2. Project Description: Use as much detail as possible, including in which years planning, design, and construction will take place unless such information is provided in table form in the EPR system. List and describe specific locations and equipment. Also indicate who will accomplish the work (contractor, Seabees, in-house).
  3. Cost Breakdown (Place this information in the “Comment” or “Narrative” field of the EPR).
    - a. Provide background of funding request. How was the funding (cost estimate) request determined? Unit price and number of units considered indicated? How was the Guidebook Item cost guidance used? EFD estimate? Contractor bids? See examples provided in paragraph D.
    - b. For training items, how many individuals will be trained per year? What is the specific course/conference/seminar and the its cost? If possible, break down the yearly cost.
    - c. For multiple pieces of equipment, state cost per item and number of items.
    - d. Also provide some justification or explanation for decreases or increases in funding (other than inflation). (e.g. “Project is scheduled for completion in 1999.” or “Partial closure due to BRAC in 1999 will reduce permit/reporting requirements through 2003.”)
- C. Additional Information:
1. Consequences if not fully funded As a result of activity, claimant, or other review, funding changes can occur. A brief statement addressing the consequences of partial, deferred or eliminated funding may assist in preserving the requested funding amount. (e.g. “Full funding in FY 99 will provide necessary activity baseline information. Partial or delayed funding will jeopardize other planned compliance, conservation and/or pollution prevention projects.”)
  2. POC and Phone Number/Internet address. While this information is already requested in other EPR fields, individuals reviewing the narrative field should also have ready access to POC information.

D. Examples

**For: Update Air Toxics Emissions Inventory Guidebook # 01006**

1. Regulatory Driver - CA State law AB2588 requires that the risks due to exposure to toxic air emissions from industrial sources be evaluated
2. Project Description - Toxics Air Emissions Inventory reports require updated toxic emission inventories. Annual inventories will satisfy State law CA AB 2588.
3. Cost Data - FY 98 - FY 03: Developed from historical costs and EFD estimate, expect each Inventory to cost \$60,000 (based on FY 96 \$, calculated using a unit price of \$323/source for 186 source units). 3% inflation for FY 01 - FY 05. If project is not fully funded, the activity will be in non-compliance with CA State law AB 2588.
4. POC is Christian Fletcher (012)-876-0000

**For: Waste Stream Determinations / Analysis # 02012**

1. **Regulatory Driver** - RCRA; as LQG with less than 90 day storage unit, must comply with 40 CFR 262.34 and 40 CFR 265.13, by reference, which requires detailed analysis with information necessary to treat, store, dispose of waste.
2. **Project Description** - Waste stream analysis is performed to update waste profiles when processes change and to properly characterize unknowns or wastes that do not fit existing profiles. Analyses are performed by commercial lab.
3. **Cost Data** - FY 01 - FY 05 costs are based on 3% inflation applied to FY96 historical cost data. Costs are for an average 8 HW profile updates per year @ approx.\$2500 which includes TCLP metals and/or organics as appropriate and underlying hazardous constituent analyses, target analytes are selected based on process knowledge. Cost also includes minimal labor to obtain analysis and update/maintain profile database. Maximum of 3 HW streams per year that are unknown or do not meet existing profiles.

Calculation: (8 HW profile updates/yr) x (\$2500) = \$20,000  
(3 one-time determinations/yr) x (\$2500) = \$ 7,500  
TOTAL Guidebook Item #02012 = \$27,500

CONSEQUENCES IF NOT FUNDED: TSDF will not accept waste for treatment/disposal without proper characterization; will violate accumulation time limit for LQG; will be out of compliance with RCRA and possible subject to fines.

4. POC is Edward "Blackbeard" Teach (222) 222-2222

**For: Species Surveys/Assessment Guidebook # 12001**

1. Regulatory Driver - Endangered Species Act of 1973 and the Marine Mammal Protection Act
2. Project Description - Conduct a fall migration study for the waterfowl on the northeast part of the activity. The results of the study will assist in developing a management plan for the waterfowl. (See A-106 record 00243-12056 for associated project)

3. Cost Data - FY 01 - \$30,000 annual cost based on Guidebook guidance and historical cost.
4. POC is Ishmael Ahab (345) 678-3333

**For: Training Required by Navy Policy Guidebook # 12941**

1. **Regulatory Driver** - OPNAVINST 5090.1B Ch. 20
2. **Project Description** - Training to stay abreast of regulatory changes as well as Navy policy. Cost include 3 people attending annual DOD Meeting in addition to 2 training seminars within the region.
3. **Cost Data** - Travel/hotel costs: \$120/day/person.  
Seminar/registration/training costs: \$250 / person
4. POC is Jean Pierre LeFitte (331) 504-3333

