

Performance Work Statement Environmental Compliance Services ID/IQ

I. Introduction

The United States Army's Installation Management Command's (IMCOM) mission is to enable Soldier and Family readiness and provide a quality of life that matches the quality of service they provide to the Nation. IMCOM provides equitable, effective and efficient management of Army installations worldwide to support mission readiness and execution, enable the well-being of Soldiers, civilians and family members, improve infrastructure, and preserve the environment. IMCOM US installations are located in Alaska, Hawaii and 32 CONUS states. As part of this mission, IMCOM meets the environmental requirements at its garrisons/ installations, headquarters organizations, regions, and US Army Environmental Command (USAEC) through a combination of government employees and contracted environmental service support. Contractor support has been a key factor in the IMCOM management of environmental services and generally, the types and levels of environmental services support are similar across IMCOM.

The objective of this contract is to provide a vehicle for performance based environmental services support to meet legal environmental requirements throughout IMCOM. The contract will provide contract support services to satisfy the requirements of IMCOM Headquarters, IMCOM Regional Offices, IMCOM garrisons/installations, the USAEC, and other organizations (to include the US Army Corps of Engineers) that may require support under this contract.

IMCOM training, administrative, and research, development, test and evaluation (RDTE) installations may conduct the following activities:

- Maneuver training at the company, battalion, or brigade level
- Munitions live-fire training
- Tactical vehicle and weapons system maintenance, usually below depot level
- RDTE in laboratories and on outdoor ranges and test tracks
- Managing facility utilities including drinking water treatment and distribution, wastewater and storm water collection and treatment, heating or power-generating boiler operation, emergency power generation, hazardous and non-hazardous waste collection and disposal, pest management, and spill response
- Building and facility infrastructure renovation and demolition

These installations must comply with Federal, regional, state, and local environmental regulation of air pollution, drinking water, water pollution, waste management, above-ground and under-ground storage tank management, spill prevention and cleanup, emergency planning and reporting, and pesticide management. The corresponding Federal laws are the Clean Air Act (CAA), the

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Safe Drinking Water Act (SDWA), the Clean Water Act (CWA), the Resource Conservation and Recovery Act (RCRA) Subtitles C, D, and I, the Emergency Planning and Community Right-to-Know Act (EPCRA), the Oil Pollution Prevention regulation, the Toxic Substances Control Act (TSCA), and the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). In addition, DOD and Army regulations set additional requirements.

Representative performance objectives under this PWS include completing permit applications or revision requests, assessing spill or construction sites for contamination, recommending pollution control technology and strategies, training facility personnel, developing and implementing sampling strategies, and creating or revising required plans, surveys, and studies.

The following are EXCLUDED from this PWS:

- Management and professional services provided by contractor personnel routinely working at the Army facility
- All stages of contaminated site investigation, remedy selection, and cleanup required by CERCLA or RCRA except 1-time preliminary site investigation of a new suspected contaminated site to determine further action
- Waste transport and disposal on or off post
- Work on any privatized utility that is the responsibility of the utility manager
- Natural resources compliance
- Cultural resources compliance
- Representing the US Army in negotiations or discussions with regulators
- Purchase of equipment for installation use, other than sampling or monitoring equipment

The contractor shall provide technical assistance to the Army and other military components with environmental compliance requirements in five broad categories of requirements: (1) Survey, inventory, or investigation, (2) Program Improvement, (3) Sampling and Analysis, (4) Training, and (5) Environmental Compliance Review. Each service is described below.

This procurement may require the following services ***occasionally***:

- State registered professional engineer or professional geologist certification of documents or plans, if required by law or regulation, for example, to prepare a Spill Prevention, Countermeasures, and Control Plan.
- Site surveys for unexploded ordnance (UXO) or munitions and explosives of concern (MEC), for example to conduct a construction site survey.
- Personnel security clearances, for example to prepare a Water System Vulnerability Assessment.
- Drilling services for installing or closing sampling wells.

II. Tasks

1) ***SURVEY, INVENTORY, OR INVESTIGATION***

Gather data (includes developing or updating an inventory of installation compliance sites, sampling, and sample analysis); develop management strategies or conceptual designs; prepare, review and update permit applications/modifications/renewals and prepare, review and update management plans required by permit or environmental regulation. Example products include permit applications; legally required but not permit-related plans such as Spill Prevention, Control, and Countermeasures Plan; legally required reports such as the EPCRA toxic release inventory; and studies for meeting new or existing compliance requirements.

- a. Permit application, revision, and closure for air, water quality, drinking water, waste storage, management, or transport, storage tanks, or hazardous material storage. Providing this service may require site visits, personnel interviews, data collection and analysis, draft and final documents, certification by a state-registered professional engineer or geologist, and data entry into Army databases. Examples of this service:
 - i. All data collection and documentation required for applying for, renewing, modifying, and terminating environmental construction and operational permits and registrations.
 - ii. All sampling and analysis and modeling of emissions, pollution, releases, or other as required.
 - iii. Participating in or conducting public meetings as required for permitting process.
 - iv. Creating and updating permit required management plans and reports.
 - v. Support for the purchase, exchange, and management of air emissions reductions credits.
 - vi. Technical support of Army environmental staff in meetings with regulators.
- b. Non-permit compliance services. Studies, reports, and plans that are required by Federal, state, regional, local, or Army regulation, not related to any installation permit. Providing this service may require site visits, personnel interviews, data collection and

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analysis, sample collection and analysis, draft and final documents, certification by a state-registered professional engineer or geologist, and data entry into Army databases. Examples of this service are:

- i. Prepare, review, and update required surveys, inventories, reports and plans, including air emissions inventories, Air Risk Management Plans, Wellhead Protection Plan, New source review (Air), Installation Spill Contingency Plan/Spill Prevention Control Countermeasures (SPCC) Plan; Pest Management Plan, spill Emergency Contingency Plan; Consumer Confidence Reports; National Environmental Policy Act (NEPA) and cumulative impacts tracking as applicable and required, ODS Inventory, regulated facility closure plans, Water system vulnerability assessment and emergency response plan, hazardous waste annual or biennial reports, Army and legally-mandated hazardous waste management and minimization plans.
- ii. Complete Emergency Planning and Community Right-to-Know Act hazardous substance storage and toxic chemical release reporting, including threshold evaluations, completing reporting forms, and providing records.
- iii. Provide technical expertise to assist in determining NEPA mitigation monitoring and cumulative impacts tracking, as applicable and required.
- iv. Develop hazardous waste profile sheets.
- v. Environmental Closure Liability (ECL) reporting. The Army must report annually its environmental liability from cleanup and clean closure of environmental compliance sites such as permitted and non-permitted hazardous waste facilities, underground storage tanks, buildings with asbestos or PCBs, electroplating facilities, and others. Providing this service may require inventorying ECL sites at the installation, researching state and local clean closure requirements, developing estimated and actual ECL cost per site, and updating Army data bases.
- vi. Radon, asbestos, and PCB surveys of buildings, when required by state or local regulation. Providing this service may require site visits, placement and collection of radon detection equipment or devices, and documentation of

results. Mitigation is NOT included.

c. Site Assessments

- i. Site investigations of Army property in preparation for future construction activity. Providing this service may require record reviews; personnel interviews; soil and water sampling in accordance with sampling, health and safety, and quality assurance plans; surveys for unexploded ordnance (UXO) or chemical agent; and documentation of results and recommendations, including entering data into DOD or Army databases. In many cases, this work must be coordinated with facility decommissioning and demolition. Actual site cleanup is NOT included.
- ii. Limited preliminary assessment and site investigation of potentially-contaminated sites to determine if site contamination exists at levels that require cleanup under the RCRA and other Federal, state, or local regulations. If the site is contaminated, further investigation, remedy selection, and cleanup are not included under this PWS.

2) PROGRAM IMPROVEMENT

- a. Provide program improvement not required by Federal, state, or local regulation, but intended to improve environmental compliance cost, effectiveness, or delivery time. Providing this service may require site visits, personnel interviews, data collection to understand facility and tenant processes and to document baseline waste and costs, onsite training, and follow-up data collection and analysis to demonstrate actual return on investment. Examples include:
 - i. Recycling Program Financial Accounting Audit or Conversion.
 - ii. Installation Solid Waste Benchmark Study.
 - iii. Pollution prevention assessments (PPOA) in support of DOD waste, chemical use, water use, and energy use reduction goals.
- b. Develop facility environmental geographic information system (GIS) layers that comply with DOD and Army GIS requirements. Providing this service may require site visits to identify and map all

- c. Perform activities and analyses supporting environmental management systems (EMS), including:
 - i. Developing EMS program related guidance
 - ii. Develop implementation plans and strategies enabling installations and/or customers to adopt EMSs based on ISO 14000 or the Code of Environmental Management Principles (CEMP).
- d. Evaluate new technology for compliance with applicable military specification, effectiveness, return on investment and compliance with applicable environmental regulations.

3) SAMPLING AND ANALYSIS

Provide sampling, analysis and monitoring for permit and regulatory compliance. Sample, monitor, and analyze samples of drinking water, waste water, surface waters, storm water, groundwater, air emissions, regulated waste, suspected contaminated media, and solid waste not associated with other services. Providing this service may require developing and implementing statistical sampling, health and safety, and quality assurance plans; siting and drilling wells; installing equipment for continuous or intermittent sampling or monitoring in all kinds of climates; collecting samples from solid, liquid, or gaseous media on-post; transporting samples to laboratories for analyses; laboratory analyses; entering data into facility or Army data collection systems; and producing written reports of results. The performance objective will include acceptance of sampling results by the applicable regulatory agency.

4) TRAINING AND ENVIRONMENTAL AWARDS

Provide Army staff with training that is required for compliance or that improves program management. Examples of training services include:

- i. Establish and maintain website(s) or other communication methods to promote installation-wide environmental outreach and document publication.
- ii. Develop nomination packages for local, state, Army, DOD, federal or private organization environmental stewardship

- iii. Develop and present required environmental training to garrison and tenant staff, for example: initial and refresher HAZWOPER training; training for personnel handling petroleum as required by Spill Prevention, Countermeasure, and Control Plans; training for underground storage tank operators as required by the Energy Policy Act 2005; training in the installation Environmental Management System; unit and tenant environmental compliance officer training; pollution prevention training.

5) ENVIRONMENTAL COMPLIANCE REVIEW

Identify environmental impacts of planned actions. Conduct required facility and equipment inspections and testing.

- i. Review garrison and tenant plans, projects, and activities to identify potential impacts related to environmental regulations. Reviews may include garrison master plans; construction or renovation plans and designs; work orders; training exercises; stationing changes; facility policies; Morale, Welfare, and Recreation events; facility changes of use; digging permits; etc.
- ii. Conduct internal inspections and testing. Compliance regulations such as RCRA Subtitle C and I and required plans such as the SPCC plan all require periodic facility or equipment inspections and testing. Inspections and testing require compliance site visits and personnel interviews, and testing may require specialized equipment to be brought on-site. Inspections and tests may be required to be conducted in accordance with applicable industry standards. Provide the installation with documentation of the results and recommended action.
- iii. Conduct internal assessments and audits. Army regulation requires periodic internal compliance assessments and environmental management system audits. Most Army installations are implementing environmental management systems in accordance with the ISO 14000 standard. Typically, assessments and audits require compliance site visits and personnel interviews. All require providing the installation with documentation of the inspection or audit, findings, and recommended correction.

III. Historical Work Breakout and Material Costs

Historically, IMCOM environmental funds for the work covered by this PWS have been spent as follows:

Task	Estimated percent of work
1. Survey, inventory, & investigation	70%
2. Program Improvement	14%
3. Sampling & analysis	6%
4. Training	7%
5. Environmental compliance review	3%
	100%

Past obligations may not necessarily predict future environmental funding needs.

Most tasks will require minimal material costs. Sampling required for any task may require sampling equipment and tools; containers; chemicals; and well installing and closing material such as liners, screens, grout, and concrete.

IV. Performance-Based Acquisition

Task orders under this PWS will be performance-based. This section discusses possible task order risks, performance objectives, and performance measures. During task order competition, contractors will be asked to propose task performance objectives and measures.

- 1) Risks. AEC is aware of the following risks that will affect task orders under this PWS:
 - a. Environmental regulations are rarely performance-based and often quite prescriptive.
 - b. Environmental compliance outcomes are often dependent on regulator decision (for example, permit application accepted or permit granted) or public input.
 - c. Installation data may not be complete, correct, or up-to-date in all cases.
 - i. Real property inventory data, especially for environmental compliance sites, may be incomplete and out of date.
 - ii. Garrison environmental inventories and surveys may not keep up with the pace of construction and renovation.
 - iii. Tenants do not always coordinate with Public Works and the Environmental office before self-help renovations, implementing new equipment, or fielding new weapons systems.

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- d. Because of accelerated and ambitious schedules, installation master planning changes may affect tasks that are in progress.
- e. Secure areas are difficult to visit, inspect, and survey.
- f. Military tenants are often deployed or otherwise unavailable.
- g. Military specifications that govern how weapons systems are maintained are designed to ensure performance in all environments and often specify hazardous materials use.

2) Performance Objectives. The overall objective of the Army environmental program is to sustain our installations by:

- a. Minimizing or eliminating the environmental impacts to the surrounding community and ecosystems from military training; dependent housing; facility construction; maintenance, repair, and renovation; and facility operation through regulatory compliance, source reduction, and waste minimization
- b. Minimizing energy and water use

Intermediate program objectives may be:

- a. Maintaining or returning to regulatory compliance
- b. Reducing enforcement acts, compliance sites, or compliance cost per unit production (for example, gallons of wastewater treated, pounds of hazardous waste managed, number of vehicles maintained or number of soldiers trained)
- c. Reducing hazardous chemical use and release
- d. Anticipating and mitigating the environmental impacts of planned actions