ARMY CLEANUP PROGRAM

INSTALLATION ACTION PLAN GUIDANCE

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1.0 PURPOSE

This document provides guidance for preparation of Installation Action Plans (IAPs) that outline the total multi-year environmental cleanup program for Army active installations. This document also provides guidance for conducting IAP Workshops. The Assistant Chief of Staff for Installation Management (ACSIM) is publishing separate BRAC IAP guidance to address preparation of BRAC IAPs at closing installations. The US Army Corps of Engineers provides equivalent Management Action Plan Guidance for FUDS in their Engineering Regulation 200-3-1.

The Army Environmental Cleanup Program includes the Army Defense Environmental Restoration Program (DERP), which is composed of Installation Restoration Program (IRP) and Military Munitions Response Program (MMRP) categories, and the non-DERP Compliance-related Cleanup (CC) Program. This guidance addresses the IRP and MMRP category responses within the Army DERP as if they are separate programs rather than categories within the Army DERP. Doing so simplifies the guidance and conforms to commonly accepted practice in the field.

Active Installations, including the non-BRAC excess installations managed by the ACSIM BRAC Division, that receive DERP funding are required to submit an updated IAP annually to the US Army Environmental Center (USAEC). The Army Environmental Compliance-related Cleanup Implementation Guidance, 21 July 2004, requires IAPs for installations with CC sites. Action plans present an integrated, coordinated approach to achieving the installation's environmental restoration goals and costs-to-complete. The plans define all cleanup requirements, propose a comprehensive approach to conduct investigations and remedial actions, and identify possible removals and interim remedial actions at an installation.

The intended audience for this guidance is the installation Remedial Project Manager (RPM), their executing Project Managers, stakeholders, the USAEC, the Army Cleanup Program Managers, and Headquarters Department of the Army (HQDA).

Installations with significant environmental cleanup programs develop IAPs through scheduled IAP workshops. The workshops provide a forum for stakeholders to discuss and review the overall management, execution, and

financial requirements of an installation's environmental cleanup program. This guidance provides the format of these workshops. Installations not having workshops must follow this guidance in preparing their IAPs.

- USAEC currently prepares an installation action plan for each installation with sites in the DERP program. During this effort, USAEC will assist in preparing a separate IAP to detail sites in the Compliance-related Cleanup program.
- This does not apply to OCONUS installations. OCONUS installations have the option of requesting assistance from AEC or preparing their own plans. The format and content must follow published guidance. In addition, HQDA has the option to review the plans and conduct site visits where appropriate.
- After the initial round of workshops is completed, some installations may no longer require the compliance-related cleanup portion of the workshop. The number of sites may be small and the remedial actions simple enough that a book update may be all that is required.

A list of acronyms used throughout this document is located in Appendix 1.

2.0 RECOMMENDED USE OF THE ACTION PLAN

The IAP is more than a simple listing of individual sites and their associated schedules and funding requirements. Installations and project executors should use the IAP as a comprehensive planning tool to tell a clear story of where the installation's cleanup program is planning to go, how it intends to get there, and why the journey is necessary in the first place.

The Army encourages installations to use the IAP to present regulators and the interested public with the comprehensive plan for the DERP segments of the environmental cleanup at the installation. The plan should present solid evidence that the Army is firmly committed to expeditious identification, investigation and cleanup of environmental contamination, and that the installation has a credible, organized program to carry out that commitment.

The USAEC, the Army Cleanup Program Managers, and HQDA use the IAPs to monitor requirements and schedules and make decisions concerning tentative budgets for all Army cleanup activities.

3.0 INSTALLATIONS REQUIRED TO PREPARE AN IAP

All installations that require Environmental Restoration, Army (ER,A) funds for eligible environmental IRP and MMRP category restoration activities must

develop IAPs. Installations with CC sites will complete a separate IAP for those sites.[1]

Active Army installations with any of the following must prepare an IAP.

- Requirements in the current IRP or MMRP Obligation Plans.
- Requirements in Army Environmental Data Base – Restoration (AEDB-R) Cost-To-Complete for IRP or MMRP.
- AEDB-R sites with a site status of "Underway" or "Future."
- Requirements in Army Environmental Data Base – Compliance-related Cleanup (AEDB-CC) Cost-To-Complete for CC.
- AEDB-CC sites with a site status of "Underway" or "Future."

Active installations that require IAPs and have Base Realignment and Closure (BRAC) sites will include the BRAC sites (i.e., IRP, MMRP, and closure-related compliance) in the IAP.

4.0 PREPARATION OF THE IAP

The installation is responsible for preparing and updating the IAP. If the installation uses an IAP workshop to develop the IAP, the IAP workshop guidance (section 10) incorporates a schedule for coordination between the installation and the USAEC workshop team for production of the IAP.

The IAP is a "living document." Even though an installation is required to officially submit an approved IAP annually to the program manager, the installation should coordinate with the program manager (or the entity preparing the plan for the installation) to update the plan whenever a significant change to the program occurs or as needed for presentation to regulators and interested public. The installation should seek public affairs and security review of the IAP before distribution to the regulators, public, or Administrative Record, to ensure that no sensitive information is released.

Installations are encouraged to include executors, regulators, and Restoration Advisory Board (RAB) or Technical Review Committee (TRC) participation when preparing/updating the DERP segments of the IAP.[2]

[1] The Army can reimburse State regulators for participation in the DERP portion of IAP development through the Defense State Memorandum of Agreement and Cooperative Agreement process established for the DERP. There is not a similar funding reimbursement process for CC projects or requirements. While the Army welcomes regulator participation in the CC portion of IAP development, the Army cannot require or encourage regulator participation. Therefore a separate portion of the installation's action plan devoted to CC requirements alleviates the appearance that DERP funds are supporting CC requirements and that regulators can be or are being reimbursed for oversight of CC requirements. The same argument for RAB and other stakeholder participation is true.

[2] See footnote #1.

5.0 BASIC IAP REQUIREMENTS

The IAPs include the following:

- A short chronological installation history of contamination studies
- Major issues that affect the overall cleanup.
- Descriptions of IRP, MMRP, BRAC program, and compliance-related cleanup sites.
- Response actions taken.
- Past milestones.
- Realistic goals and schedules based on known and expected cleanup projects.
- Cost-to-Complete

The IAPs also include identification of any possible or future removal (REM)/interim removal action (IRA)/remedial action (RA). Prior year funding and cost estimates details for IRP, MMRP, and CC sites through the entire remedial process are included. The IAP must include a program exit strategy for reaching remedy in place/response complete (RIP/RC). Include in the strategy the process for receiving regulatory closure of each site by obtaining a "No Further Action" determination. Excess properties will also include a property disposal strategy.

5.1 *Army Environmental Data Base-Restoration (AEDB-R)*

Sites addressed in the IAP include all IRP, MMRP, and BRAC program sites in the AEDB-R, including response complete sites. Installations that use the IAP workshop will have all AEDB-R data updated within 30 calendar days following the IAP workshop (or 30 days after database opens) to ensure accuracy and consistency between the IAP and database. Installations that do not use an IAP workshop will update AEDB-R data in accordance with the schedule in the data call memorandum.

Most installations use the AEDB-R site identifications (IDs) within the restoration program to identify sites. However, some installations use solid waste management unit (SWMU) numbers from their Resource Conservation and Recovery Act (RCRA) Facility Assessments (RFAs). Installations that commonly use SWMU designations in reports, documents, and document titles, etc., are required to provide a cross-reference or conversion chart between SWMU numbers and AEDB-R site IDs and the reverse in the IAP. Keep in mind that even though the installation uses the SWMU designation, the IAP must address all sites by AEDB-R designations.

5.2 *Army Environmental Data Base-Compliance-related Cleanup (AEDB-CC)*

A separate IAP will address all CC sites in the AEDB-CC for an installation, including response complete sites. Installations that use the IAP workshop will have all AEDB-CC data updated within 30 calendar days following the IAP workshop (or 30 days after database opens) to ensure accuracy and consistency between the IAP and database. Installations that do not use an IAP workshop will update AEDB-CC data in accordance with the schedule in the data call memorandum.

Most installations will use the AEDB-CC site IDs within the cleanup program to identify sites. However, some installations use solid waste management unit (SWMU) numbers from their RFAs. Installations that commonly use SWMU designations in reports, documents, and document titles, etc., are required to provide a cross-reference or conversion chart between SWMU numbers and AEDB-CC site IDs and the reverse in the IAP. Keep in mind that even though the installation uses the SWMU designation, the IAP must address all sites by AEDB-CC designations.

5.3 *Funding Information*

<u>For IRP, MMRP, and BRAC</u>

The IAPs include prior, current, and out-year funding data presented as the total IRP, MMRP, and BRAC budget from inception of the program at the preliminary assessment phase to projected completion of all remedial actions, as well as all remedial action operations (RA(O)) and long-term management (LTM).

Current year funding and out-year funding requirements must be presented at the site-level. However, since the Army only began using site-level data in fiscal year 1996 (FY96), the installation may present the IAP prior year funding information at the project level.

Each AEDB-R site with ongoing or future planned restoration activity must include cost estimates in the IAP. Current year funding in the IAP must reflect available funding as presented in the installation's current year IRP and MMRP obligation plans and BRAC workplan. It is important that the financial projections contained in the IAP be consistent with the cost-to-complete (CTC) requirements in AEDB-R, as updated. Out-year funding requirements in the IAP will support the installation's programmed (or constrained CTC estimates) requirements in AEDB-R.

Except for the MMRP program, the installation is responsible for preparing cost estimates and assembling all backup documentation for each site in the different cleanup programs. For the MMRP, the USAEC will determine the remedy,

prepare the cost estimates, and determine the schedule. The installation must perform a supervisory review on each site in the different programs.

For CC

The installation must address each AEDB-CC site with ongoing or future planned cleanup activity in the IAP. The IAPs will include current and out-year site-level funding requirements for CC sites. The CC program is currently developing site-level cost estimate requirements that it will incorporate into the IAP. Installations will enter cost data from inception of the program at the facility assessment phase (SI and CS phases in the AEDB-CC) to projected completion of all corrective measures, as well as all corrective measure implementation operations (CMI(O)) and long-term management (LTM).

Current year funding in the IAP must reflect available funding as presented in the installation's current year budget. It is important that the financial projections contained in the IAP be consistent with available funding in the POM and CTC requirements in AEDB-CC, as updated. IAP outyear funding will be unconstrained in AEDB-CC.

All cost estimates must have an audit trail that adequately supports the estimate and provides an explanation for the basis of the estimate (RACER, Corrective Measures Study, past contract cost, or approved engineering estimate), the date prepared, preparer's name, and supervisor's signature. See the current CTC guidance for specific requirements for developing cost estimates.

5.4 *Community Involvement Information*

For IRP, MMRP, and BRAC

The IAPs include information on the status of community involvement within the installation's cleanup program. The Army encourages regulator and public participation in the preparation and updating of IAPs at all installations. If regulators or the public is involved in the preparation or updating of IAPs or if an installation furnishes a copy of an IAP to its regulators or the public (RABs or TRCs), the IAP should document that involvement.

Two versions of the final IAP will be developed for the installation, one for Army use only and a second that is modified for public release (See Section 7.0). The installation's Public Affairs and Security Offices must review and approve the public release version of the IAP before posting on the web to ensure that no sensitive data is released.

Any installation RAB/TRC that desires Technical Assistance for Public Participation must note the requirement in the IAP.

For CC

The level of public participation in the CC is defined by the permit, enforcement order, or interagency agreement and must be documented in the IAP. The IAP must also document any regulator and/or public involvement in the preparation or updating of IAPs and any distribution of the IAP to those parties.

5.5 *Approval and Concurrence*

Once the IAP has been prepared/updated with appropriate input from the installation, Installation Management Agency (IMA), Major Command (MACOM), National Guard Bureau (NGB), executing agency, the USAEC, regulatory agencies, and other stakeholders, the installation commander, garrison commander, The Adjutant General (TAG), or designated authority signs the IAP indicating approval.

Each signature block must include the date signed.

IRP and MMRP Sites

The installation forwards one signed signature page and the electronic version of the IAP to their USAEC Restoration Manager where the USAEC Oversight Branch and Cleanup Division Chiefs also sign the IAP, indicating concurrence. ARNG Federally Supported sites should send a copy of the signed IAP to the NGB for signature, indicating concurrence, before sending the IAP to the USAEC. The USAEC will send a copy of the completed signature page back to the installation.

Excess Installations Sites

Excess installations managed by the BRAC Division (BRAC D) should forward one original signature page and the electronic version of the IAP to the BRAC D for signature, indicating concurrence, before sending the IAP to the USAEC. The USAEC will send a copy of the completed signature page back to the installation.

BRAC Sites

Active installations with BRAC sites should forward one original signature page and the electronic version of the IAP to the BRAC D for signature, indicating concurrence of the BRAC portion, before sending the IAP to the USAEC. The BRAC D will then forward the original signature page to the USAEC Restoration Manager where the USAEC Oversight Branch and Cleanup Division Chiefs also

sign the IAP, indicating concurrence of the Active portion. The USAEC will send a copy of the completed signature page back to the installation.

CC Sites

Installations with CC sites should send a copy and/or electronic version of the IAP with one original signature pages to the Installation's designated IMA Region for signature by its Chief, Environmental Office. The IMA region will send a copy signature page to the USAEC and the original back to the installation, representing a completed action. Special Installations with CC sites should send a copy and/or electronic version of the IAP with one original signature page to the installation's designated chain-of-command for signature. The installation's designated chain of command will send a copy signature page to the USAEC and the original back to the installation, representing a completed action. ARNG Installations with CC sites should send a signed copy and/or electronic version of the IAP with one original signature page to the NGB for signature by Environmental Programs Division. The NGB will send a copy signature page to the USAEC and the original back to the installation, representing a completed action.

5.6 *Independent Technical Review/Site Specific Technical Assistance*

If an installation has undergone Independent Technical Review (ITR) or site specific technical assistance, the IAP will contain a summary of the recommendations being implemented and any progress towards those recommendations. The discussions should include any impediments to fully implementing recommendations and rationale for not implementing any recommendations.

6.0 IAP CONTENT

There are six sub-sections in the IAP, as well as a general section about the installation. An installation may wish to include additional information or present the information in a different manner within any section. As long as the IAP contains all basic requirements and all necessary information in each of the sections and attachments, additional information can be included. Exceptions are the "***Installation Information***" and "***Cleanup Program Summary***" which must precisely follow the specified format.

Appendix 2 provides an explanation of the information required by each program for each element of the IAP. The required formats for the IAPs are detailed in Appendices 3 and 4.

7.0 SUBMITTAL

The installation will be responsible for submitting the completed and signed IAP through their chain of command (see Section 5.5 Approval and Concurrence). If the installation does not participate in an USAEC sponsored IAP workshop, the installation should coordinate the IAP with the program manager and mail the final signed copies to the USAEC and the respective IMA Region, NGB, or MACOM by 31 August of each fiscal year.

If the installation participates in an IAP workshop, the installation should follow the schedule described in the IAP Workshop guidance (see Section 10). At a minimum, the installation should mail the original signature page to the appropriate program manager - no later than 120 days following a workshop.

Installations/program managers should mail copies of IAPs and/or signature pages to:

Commander
US Army Environmental Center
ATTN: SFIM-AEC-CDP
Aberdeen Proving Ground, MD 21010-5401

Installations not participating in an IAP workshop may use electronic mail to send a file copy of their installations' action plans to the USAEC IAP team for formatting and publishing. After formatting, USAEC will send a copy of the IAP to the installation for final approval and signatures.

8.0 DISTRIBUTION OF IAPs

The DoD recommends that the military components make environmental management plans for DERP, such as IAPs, available to environmental regulators and the public. The Army also encourages using the IAP to brief the planned installation restoration activities at RAB and TRC meetings, or other public meetings. However, all IRP, MMRP, and BRAC IAPs must have the CTC removed before distribution to the public or regulators or placement in the information repository. Additionally, the installation will conduct public affairs and security reviews of the public version IAP before it is posted on a public web site maintained on DENIX. The Army Knowledge Online (AKO) IAP web site will contain both public versions and Army versions of the IAPs for viewing and printing by Army authorized users.

Distribution of CC IAPs to the public or regulators or placement in the information repository is not required or recommended unless directed by the permit, enforcement order, or interagency agreement. If distribution is required or desired (by the installation), the installation will remove all CTC information and conduct public affairs and security reviews before distribution.

9.0 SUMMARY OF CHANGES TO IAP REQUIREMENTS

There are ten major changes to the guidance since the last guidance prepared in January 1999. These changes affect the general format and outline of the IAP.

9.1 ***Incorporation of new command structure for the IRP category, MMRP category, and Compliance-related Cleanup programs.***

With the implementation of the Transformation of Installation Management, USAEC centrally manages the IRP and MMRP program categories for active installations.

The Installation Management Agency, National Guard Bureau, BRAC D, and MACOMs manage the Compliance-related Cleanup Program.

9.2 ***Addition of the MMRP.***

MMRP sites and requirements have been added to the IAP in accordance with the DoD DERP Management Guidance, September 2001.

9.3 ***Completion of IAP for Compliance-Related Cleanup (CC) Sites.***

Installations with CC sites will complete an IAP for those sites. However, the installation will not normally distribute this information to the public, regulators, or information repository unless required by the permit, enforcement order, or interagency agreement.

9.4 ***Addition of BRAC Sites to the IAP.***

At active installations with some sites managed by the BRAC Division, the installation will include BRAC sites in the IAP.

9.5 ***IAP Format***

USAEC will format all IAPs for consistency.

9.6 ***Disposal Strategy***

Excess and BRAC Properties will include a property disposal strategy in the current status section of the Cleanup Program Summary.

9.7 ***Exit Strategy***

The Contamination Assessment for each program (IRP and MMRP categories, or CC) will include a general exit strategy for the installation to reach RIP/RC. In addition, the cleanup strategy for each site will include a detailed exit strategy on the steps to reach RIP/RC. Include in the strategy the process for receiving regulatory closure of each site by obtaining a “No Further Action” determination.

9.8 *Detailed CTC Information*

All IAPs must have the CTC removed before distribution to the public or regulators or placement in the information repository.

9.9 *Review Prior to Distribution*

The installation public affairs and security offices will review the public release version IAP before distribution to the public, regulators, or information repository to ensure no release of sensitive information.

9.10 *Copies of the Document*

The installation will receive two paper copies of the IAP and no paper copies of the public version of the IRP/MMRP IAP. Interested parties requesting a copy of IAPs will be directed to the DENIX IAP web site.

10.0 PRINCIPAL GOALS AND OBJECTIVES OF IAP WORKSHOPS

The purpose of the IAP workshops is to provide a productive forum for all stakeholders in the cleanup program to discuss and review the overall management, execution and financial soundness of the installation's environmental cleanup program.

10.1 Supporting Objectives

In order to achieve its main goals, an IAP Workshop must accomplish a number of objectives. Objectives are listed below and identified as overarching (i.e., apply to all cleanup sites and programs), Army DERP-specific, and Compliance-related Cleanup-specific.

GENERAL SUPPORTING OBJECTIVES

- Provide a comprehensive site-level plan for all cleanup activities at the installation.
- Validate each site in the program; ensuring the cleanup process is conducted in accordance with the Army Environmental Cleanup Strategy and in compliance with Federal and State Regulations.
- Highlight systemic technical, regulatory or policy issues that may adversely affect progress toward completion.
- Provide opportunity for Army team to view the installation's cleanup program in its entirety, and examine it for overall soundness, internal consistency and financial integrity.
- Produce auditable cost-to-complete estimates that comply with financial management regulations. Emphasize focus on program completion.
- Facilitate transfer of "lessons learned" across the Army.

- Promote meaningful involvement on the part of all stakeholders.
- Obtain regulator, public, and other stakeholder input.
- Calculate the Costs-to-Complete

ARMY DERP SUPPORTING OBJECTIVES

- Identify cleanup issues and potential solutions at each individual AEDB-R site.
- Establish or update a baseline for annual cost and schedule data submission to AEDB-R.
- Program the cost-to-complete requirements; build a true program from what would otherwise be a collection of individual projects.
- Gather program/project data required for higher headquarters submission.
- Identify the potential applicability of or need for technical assistance or the viability of using Performance Based Contracting.
- Explain and/or promote key elements of Army policy to all concerned; clarify to reduce potential for misconceptions; explain the relationships between the Army Environmental Database Restoration (AEDB-R), Cost to Complete (CTC), and the IAP.
- Obtain stakeholder agreement with completion dates for phases/projects in accordance with AEDB-R to assure everyone agrees with the milestone completion schedule and supports the workload(s) that may be required.

COMPLIANCE-RELATED CLEANUP (CC) SUPPORTING OBJECTIVES

- Identify and describe projects/sites.
- Identify and describe requirements. Develop a schedule for completing actions.
- Establish or update a baseline for annual cost and schedule data submission to AEDB-CC.

10.2 *Conduct of IAP Workshops*

The IAP Workshop should involve all organizations with significant roles in an installation's environmental cleanup program - installation personnel, the executor, consultants, state and federal regulators, members of the public, and the program managers (Installation Management Agency (IMA)/Major Command (MACOM)/BRAC Division (BRAC D)/National Guard Bureau (NGB)/USAEC). The USAEC IAP Workshop team, in coordination with the program manager, will conduct the workshop on an annual basis, at an Army installation when possible. The workshop reviews the nature and significance of contamination at each individual AEDB-R and AEDB-CC site in detail, along with the plans to address the impact of that contamination. With input from all stakeholders, the workshop results in realistic and supportable cost-to-complete estimates.

The USAEC intends to conduct the majority of the workshops during the period of December through June. This general scheduling scheme allows for the collection of up-to-date programmatic and financial liability information that the Army uses in the preparation of the Financial Liability Report and related financial submissions.

Installations may expect their "annual" workshop to take place between ten and fourteen months from their previous workshop. Installations must document any major program changes and changes that cause the data in AEDB-R or AEDB-CC to not match the data in the current approved IAP by an addendum to the IAP. Installations may report information regarding smaller changes on a discretionary basis.

10.3 IAP Workshop Roles and Missions/Responsibilities

The Installation Team. The installation team includes the installation's Remedial Project Manager (RPM) and the executor and consultant support. Their mission is to be present and prepared to support the goals of the workshop. The installation is responsible for the following actions:

- Respond within 20 days of schedule inquiry to the USAEC ERM (for IRP/MMRP), BRAC D (for BRAC) or IMA/MACOM/NGB (for CC) regarding proposed dates for the workshop.
- Respond to IAP Workshop Team facilitator's survey to determine meeting location and times 60 days prior to workshop.
- Invite regulators, public representatives and supporting team members, as required; actively encourage attendance; also notify and invite appropriate IMA point of contact, installation Environmental Management System (EMS) representative, BRAC D personnel and Installation MMRP and Compliance-related Cleanup personnel (if required).
- If required, furnish hotel rooming list to the IAP workshop team, as requested.
- Coordinate with IAP Workshop facilitator and the USAEC ERM (for IRP/MMRP), BRAC D (for BRAC) or IMA/MACOM/NGB (for CC) on major or sensitive issues and special considerations prior to workshop.
- Provide comments to pre-draft IAP to USAEC workshop team 14 days prior to workshop.
- Prepare cost estimates with supporting documentation prior to workshop.
- At the workshop, be prepared with technical and regulatory details that can potentially impact cleanup decisions significantly; likewise, be prepared with supporting documentation for the major items that impact or explain cost estimates.
- Review and be prepared to discuss MMRP site information.
- Be prepared to furnish remaining AEDB-R/-CC information.
- Consolidate all comments on draft document (USAEC, IMA, Installation team, BRAC D, MACOM, NGB) and send to USAEC IAP Workshop Team

administrative support POC, within 59 days of workshop; respond with any final corrections in time for plan to be sent for publishing NLT 81 days from the workshop.

- Obtain Installation/Garrison Commander/TAG's signature on final IAP within 120 days after the workshop.
- Forward an electronic version of the IAP with one original signature pages to BRAC D (for BRAC IRP/MMRP) or IMA/MACOM/BRAC D/NGB (for CC) for signature within 120 days after the workshop.
- Forward one original signature page for IRP and/or MMRP to USAEC's IAP Records Manager within 120 days after the workshop.
- Provide public version of the IRP/MMRP IAP to Installation's PAO and Security office to obtain approval for public release within 150 days after the workshop.
- Enter all AEDB-R and AEDB-CC data (as determined) within 30 days after the workshop or 30 days after database opens.
- Send final CTC spreadsheets to USAEC ERM (for IRP/MMRP), BRAC D (for BRAC), or IMA/MACOM/NGB (for CC) within 30 days of the workshop.
- Provide written notification to USAEC MMRP team if changes in MMRP site descriptions or CTC assumptions are required.
- Provide any required addendum with appropriate signatures to USAEC ERM (for IRP/MMRP), BRAC D (for BRAC), or IMA/MACOM/NGB (for CC) if major changes occur during the year.

The Army Environmental Center IAP Workshop Team. The USAEC IAP Workshop Team will normally furnish the meeting facilitator, who will convene and lead the meeting, and an Administrative support person who will operate the electronic equipment used to record and display the plan and cost estimates.

The USAEC Workshop Team Facilitator is responsible for the following actions:

- Coordinate with the program managers and the installation on meeting logistics.
- Ensure location is determined within one month of the workshop with all relevant information sent to installation and appropriate program managers.
- Thoroughly review IAP prior to workshop.
- Provide pre-draft of IAP and agenda to installation 30 days prior to workshop.
- Coordinate with installation and program managers on technical issues of cleanup program NLT one month prior to workshop.
- Coordinate with USAEC for IRP programming budget.
- Facilitate the meeting.
- Review and comment of the draft IAP after the workshop.
- Record and distribute after action items to the participants.

- Provide after action report to program managers 7 days after workshop.
- Work with installation to complete final CTC spreadsheet NLT 30 days after workshop.
- Perform QA review of IAP NLT 74 days after workshop.

The USAEC Workshop Team Administrative Support POC is responsible for the following actions:

- Serve as point of contact for installation on all administrative matters.
- Incorporate any new IAP drafts or changes prior to workshop.
- Bring site detail reports to workshop.
- Incorporate any changes, publish, and provide final draft to installation within 95 days after the workshop.
- Post public IAP to web within 170 days of the workshop.

The US Army Environmental Center Environmental Restoration Manager (ERM). The USAEC ERM will actively participate in technical and programmatic discussions and will provide guidance regarding Army or USAEC policy issues.

The USAEC Environmental Restoration Manager is responsible for the following actions:

- Assist the facilitator with any necessary coordination on technical, regulatory or policy issues prior to the workshop; inform the facilitator within two weeks of the workshop of any particularly important or sensitive issues.
- Review the draft IAP and furnish comments to the installation within 59 days of workshop.
- Alert the USAEC Program Management (PM) Branch to any need for immediate and significant projected annual funding adjustments for IRP.
- Provide technical support and guidance for IRP, MMRP, and CC (as requested) during workshop.
- Act as the central contact between the Installation, PM Branch, and IAP team for IRP and MMRP.
- Provide internal approval letter to Branch Chiefs to acquire USAEC required signatures on document.
- Enter all AEDB-R data (when delegated by the installation) within 30 days after the workshop or 30 days after database opens.
- Provide final CTC spreadsheet to PM branch within 30 days after the workshop for IRP.
- Provide installation with guidance for documenting changes to final IAPs and MMRP data.

The Program Managers (USAEC, IMA, BRAC D, MACOM, NGB). The Program Managers will actively participate in programmatic discussions and will provide guidance regarding program issues.

The Program Managers are responsible for the following actions:

- Contact the USAEC ERM to request any specific technical or administrative assistance required in determining actions related to the workshop.
- Provide constrained programmed budgets (when required) to IAP workshop team prior to the workshop.
- Ensure the installations submit all documents required to conduct workshop.
- Support installation at IAP workshop.
- Ensure the actions and funding requirements for each site follow Army policy.
- Ensure the remedial actions selected for each site are reasonable and accurate.
- Review and concur with IAP document.
- Review CTC estimates and supporting documentation.

Regulators and Public Representatives. The Army will invite regulators and public representatives to the IRP and MMRP workshops, and encourage them to participate fully in all of the proceedings. The IAP should document any differences in positions on the proposed path forward to better plan for contingencies. The Army will give these regulators and public stakeholders every opportunity to voice their specific concerns during the planning process, and to respond to Army efforts to deal with these concerns.

10.4 Timelines

Overall Workshop Schedule. An inquiry will be made through the USAEC ERM (for IRP/MMRP), BRAC D (for BRAC) or IMA/MACOM/NGB (for CC) requesting proposed workshop dates for all appropriate installations. A draft schedule for the year will be published in the first quarter of every fiscal year that attempts to accommodate all request for dates. The workshop processes with the schedule of submissions are presented on Table 1 and 2.

Submissions Prior to the Workshop. Major modifications to previously published IAPs should be submitted to the installation's USAEC IAP Workshop Team administrative support point of contact no later than 14 days prior to the workshop.

Workshop Agenda. The general conduct of the workshop and order of phases varies little from one workshop to another. Site-specific modifications can be

considered. The Installation RPM determines the order in which the workshop discusses individual AEDB-R and AEDB-CC sites.

Submissions after the Workshop. The USAEC IAP Workshop Administrative Support point of contact will furnish the installation a draft copy of the new IAP within 14 days of the workshop. The installation should take no longer than 45 days to respond with any comments or changes. The USAEC IAP Workshop administrative support point of contact will furnish a presumed final copy to the installation within 95 days of the workshop. The installation provides the approved IAP to Program managers (USAEC, IMA, MACOM, NGB, BRAC D) for signature within 120 days of the workshop.

10.5 Workshop Locations

The USAEC will normally convene the workshops at Army facilities. However, when this is not possible they will be held at a reasonable location agreed upon by the installation, program manager, and facilitator. Location and schedule determinations take into consideration the locations from which key participants will be traveling, to avoid the necessity for weekend travel. If two workshops are occurring in the same week, a central location may be chosen to reduce overall travel, or to avoid the necessity for some team members to travel on a weekend.

10.6 IAP *Workshop Coordinating Instructions and Additional Matters*

Performance-Based Contracting. The Army will conduct workshops for installations where performance-based contracting is the prime vehicle for executing the cleanup effort. These altered workshops will generally not have detailed technical discussions of projects and their specific costs. The installation will update site descriptions in the IAP to reflect new information and work accomplished, the general plan for each site's remediation, and the status of the overall schedule for completion of the cleanup effort at the installation. The Army should identify any potential impediments and actions that it might take to address them.

Final Document Printing and Internet Availability. The USAEC IAP Workshop team will print two paper copies of the final document and ship them to the installation. Additionally, USAEC is responsible for posting the Army version of the IRP/MMRP IAPs on AKO and the final public version on a web site accessible through DENIX. Army users will be able to access both the Army and the public version of the IAP on the IAP web site through Army Knowledge Online (AKO). Both versions will be available for viewing and printing.

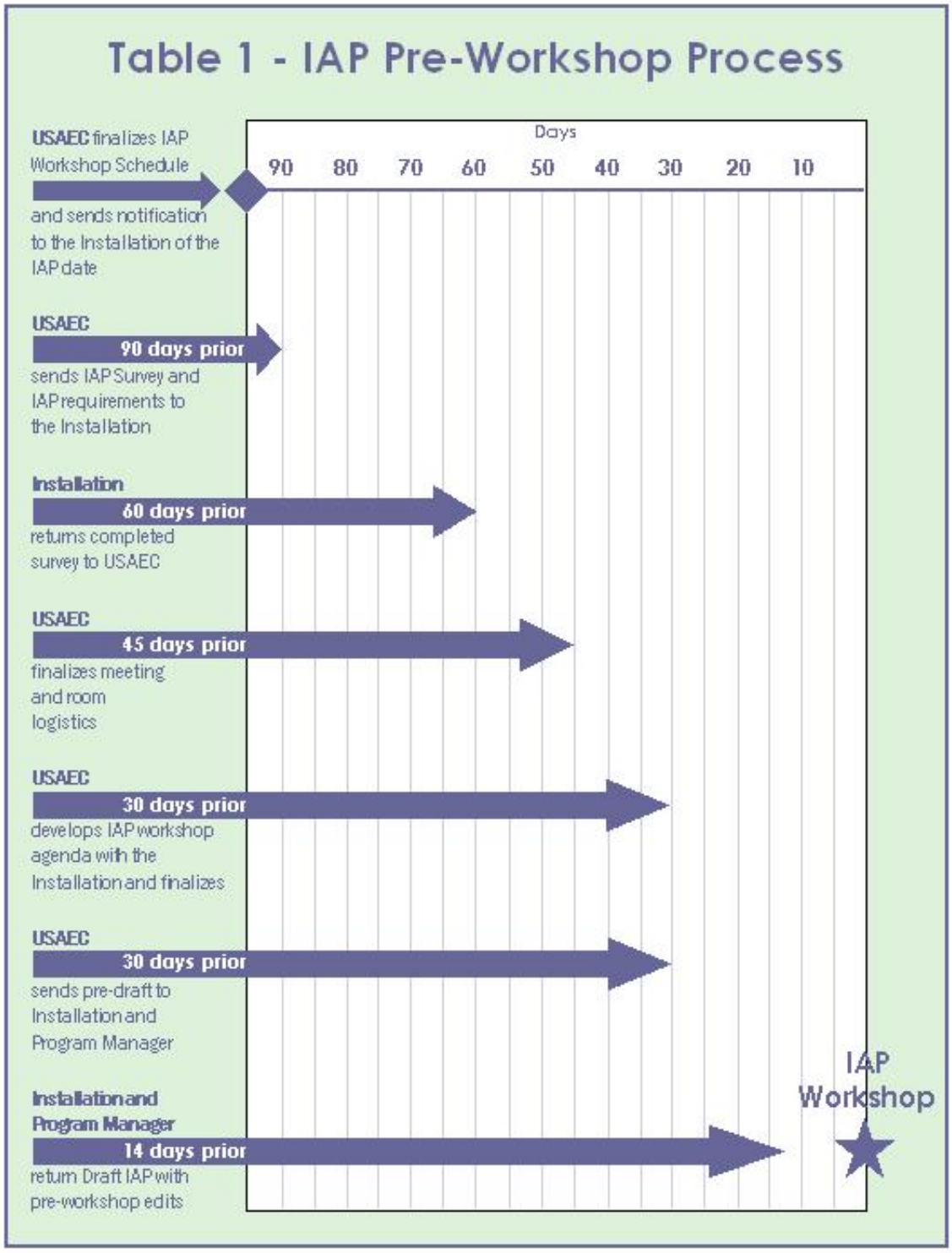
Table 1 - IAP Pre-Workshop Process
Days
90 80 70 60 50 40 30 20 10
USAEC finalizes IAP Workshop Schedule and sends notification to the Installation of the IAP date
USAEC
90 days prior
sends IAP Survey and IAP requirements to the Installation
Installation
60 days prior
returns completed survey to USAEC
USAEC
45 days prior
finalizes meeting and room logistics
USAEC
30 days prior
develops IAP workshop agenda with the Installation and finalizes
USAEC
30 days prior
sends pre-draft to Installation and Program Manager
Installation and Program Manager
14 days prior
return Draft IAP with pre-workshop edits
IAP Workshop

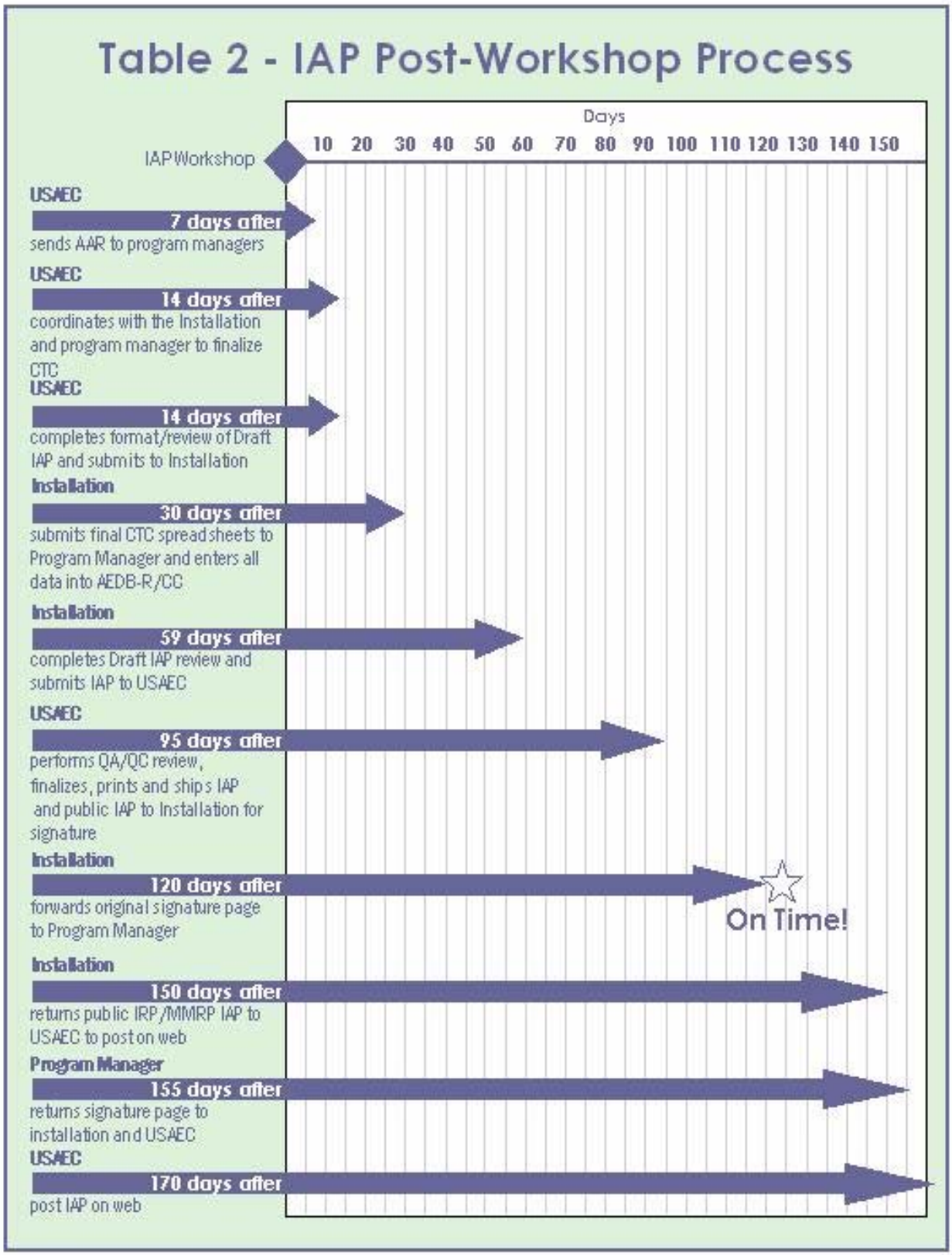
Table 2 - IAP Post-Workshop Process
Days
10 20 30 40 50 60 70 80 90 100 110 120 130 140 150
IAP Workshop
USAEC
7 days after
sends AAR to program managers
USAEC
14 days after
coordinates with the Installation and program manager to finalize CTC
USAEC
14 days after
completes format/review of Draft IAP and submits to Installation
Installation
30 days after
submits final CTC spreadsheets to Program Manager and enters all data into AEDB-R/CC
Installation
59 days after
completes Draft IAP review and submits IAP to USAEC
USAEC
95 days after
performs QA/QC review, finalizes, prints and ships IAP and public IAP to Installation for signature
Installation
120 days after
forwards original signature page to Program Manager
On Time!
Installation
150 days after
returns public IRP/MMRP IAP to USAEC to post on web
Program Manager
155 days after
returns signature page to installation and USAEC
USAEC
170 days after
post IAP on web

APPENDIX 1

Acronyms

Acronyms

ACSIM	Assistant Chief of Staff for Installation Management
AEDB-CC	Army Environmental Database - Compliance-Related Cleanup
AEDB-R	Army Environmental Database-Restoration
AKO	Army Knowledge Online
ARNG	Army National Guard
BRAC	Base Realignment and Closure
CC	Compliance-Related Cleanup
CMI	Corrective Measures Implementation
CMI(C)	Corrective Measures Implementation – Construction
CMI(O)	Corrective Measures Implementation – Operations
CMS	Corrective Measures Study
CTC	Cost to complete
DD	Decision Document
DERP	Defense Environmental Restoration Program
DoD	Department of Defense
ER,A	Environmental Restoration, Army
FFA	Federal Facilities Agreement
FS	Feasibility Study
GPRA	Government Performance and Results Act
GW	Groundwater
HQDA	Headquarters, Department of the Army
HRS	Hazard Rating Score
IAG	Interagency Agreement
IAP	Installation Action Plan
IMA	Installation Management Agency
IRA	Interim remedial action
IRP	Installation Restoration Program
ITR	Independent Technical Review
LTM	Long Term Management
MACOM	Major Command
MMRP	Military Munitions Response Program
NGB	National Guard Bureau
NPL	National Priorities List
OB/OD	Open Burning/Open Detonation
POM	Program Objective Memorandum
RA	Remedial Action
RA(C)	Remedial Action – Construction
RA(O)	Remedial Action – Operations
RAB	Restoration Advisory Board
RAC	Risk Assessment Code
RACER	Remedial Action Cost Engineering and Requirements
RC	Response Complete
RCRA	Resource Conservation and Recovery Act

RD	Remedial Design
RDX	Royal Demolition Explosive
REM	Removal Action
RFA	RCRA Facility Assessment
RFI	RCRA Facility Investigation
RI	Remedial Investigation
RIP	Remedy in Place
ROD	Record of Decision
RPM	Remedial Project Manager
RRSE	Relative Risk Site Evaluation
SWMU	Solid Waste Management Unit
TAG	The Adjutant General
TAPP	Technical Assistance for Public Participation
TNT	Trinitrotoluene
TRC	Technical Review Committee
USAEC	US Army Environmental Center
USEPA	US Environmental Protection Agency

APPENDIX 2

Program Explanations

For All Programs

General Section

The ***General Section*** contains six sub-sections that include the purpose, approval, and outline of the IAP, and general information about the Installation.

1. Table of Contents

The table of contents must list the outline and associated pages of the IAP for easy reference.

2. Statement of Purpose

This sub-section will include the following statement: "The IAP is to outline the total multi-year environmental cleanup program for an installation. The plan will define the Army's cleanup program requirements and propose a comprehensive approach and associated costs to conduct future investigations and response action at each cleanup site." This statement may be expanded if the installation so desires.

The sub-section will include a description of the coordination actions and participation of all parties that contributed to the IAP. This section lists the dates of the workshop and participants.

The Army encourages regulator and public participation in the preparation and updating of IAPs for DERP. When regulators and the public (i.e., a RAB or TRC) participate in the IAP process or the installation furnishes a copy of their IAP to regulators and the public, the IAP will contain a statement of that fact.

3. Approval and Concurrence

The installation commander, garrison commander, or TAG is responsible for execution of the cleanup program at his/her installation. Because the IAP defines all cleanup requirements and proposes a comprehensive approach to conduct investigations and remedial actions for an installation, the installation commander, garrison commander, TAG or a designated subordinate authority must sign the plan acknowledging responsibility and approval. IAPs that contain CC information will be used for informational and general planning purposes. All CC actions are subject to the semi-annual submission process through the AEDB-CC.

Installations with BRAC sites and excess installations managed by the BRAC Division should forward one original signature page and the electronic version of the IAP to the BRAC D for signature before sending the IAP to the USAEC. Installations with CC sites should send an electronic version of the IAP with the

original signature pages to the Installation's designated IMA Region, MACOM or NGB for signature by its Chief, Environmental Office. A signature page will be sent to the USAEC to represent a completed action. After submittal to the USAEC, if the IAP contains DERP sites, the appropriate Branch Chief and Cleanup Division Chief must concur with the plan.

Each signature block must include the date signed.

4. Acronyms and Abbreviations

The IAP must list and define all acronyms and abbreviations used in the IAP. In addition to a standard acronym list the following items can be inserted as needed:

- A conversion chart of RCRA and CERCLA terms.
- A crosswalk between AEDB-R and/or AEDB-CC Sites IDs and other names used by the installation.

5. Installation Information

The Installation Information sub-section of the IAP presents installation-specific information such as location, mission, command organization, executing agency, regulator participants, National Priorities List (NPL) status and potential dates for petitioning for deletion from the NPL, community involvement/RAB status, and program summaries. ARNG CC installations produce statewide IAPs that contain all ARNG sites in the state.

For NPL installations, as the installation's environmental restoration program approaches the final Record of Decision, the installation should be looking forward and initiate actions to petition the USEPA to delete the installation from the NPL. In anticipation of petitioning the USEPA for installation deletion from the NPL, the installation must project the planned date of completion of construction of all remedial actions along with the potential dates for petitioning USEPA for deletion. It will document any planned or actual actions leading to deletion (e.g., coordination with USEPA, submission of the actual request, meeting with regulators).

The data in the Installation Information sub-section should be concise and presented in a bullet-style format (See Appendix 3 and 4).

6. Cleanup Program Summary

The Cleanup Program Summary will include the installation's history, status, progress to date, and plans by program.

CC IAPs for NGB and Reserve installations are not required to have a cleanup program summary.

The Installation History presents historic activities at an installation with emphasis on activities that may have caused contamination of the environment. For NPL installations, a short narrative on the cause for the NPL listing is included in this part.

The status details the installation's present mission and regulatory status and describes how cleanup activities affect that regulatory status. The installation will identify any issues that may affect the scope and schedule for the overall cleanup program. Excess and BRAC properties will include a summary that describes the disposal plans for the property.

Installations that are on the USEPA RCRA Government Performance and Results Act's (GPRA) baseline can use this sub-section of the IAP to describe the current condition of the two specified environmental indicators. To determine if your installation is on the GPRA baseline list, check the USEPA web site at www.epa.gov/epaoswer/hazwaste/permit/pgprarpt.htm.

The progress to date section is presented in bullet form and divided by program (IRP and MMRP) and describes the progress and future plan of action. CC is not required list progress to date in this section.

The installation may attach a map of the installation to this sub-section.

7. Individual Program Sections

IRP CATEGORY SECTION

The following subsections will be included.

1. Summary

The Summary must have seven items completed for IRP category. The items include the following.

A - Total number of AEDB-R sites (IRP) and number of sites that are Response Complete.

B - Site types.

C - Most widespread contaminants of concern.

D - Media of concern.

E - Completed removals (REM), interim remedial actions (IRA), remedial designs (RDs) and remedial actions (RAs).

F - Total ER,A IRP funding information from inception of the cleanup program to completion.

G - Duration of the IRP for an installation, to include the year of inception, the anticipated or actual year of completion of all remedial actions, and the anticipated or actual year of completion of the IRP including long-term management.

The format for the Summary must be consistent with the format provided in Appendix 3.

2. *Contamination Assessment*

The contaminant assessment subsection of the IAP is a clear concise presentation of an installation's environmental restoration concerns for the IRP. This subsection includes an overview of the program category, list of previous studies, and individual site descriptions, requirements, and actions. The overview acts as an executive summary of the IRP category at the installation and includes a description of the general scope of the environmental problems and their significant impacts on human health and the environment that require some cleanup effort, as well as the type and overall scope of significant planned responses. It will list primary type(s) of contamination and affected media, describe the principal activities thought to contribute to past releases of contaminants, define any groundwater problems, and address any existing or potential for off post migration of contamination. A summary of the program category's exit strategy is also included in this section. This summary will include a detailed sequence and reasons for the sequence of cleanup activities to reach RIP/RC. Include in the strategy the process for receiving regulatory closure of each site by obtaining a "No Further Action" determination. It will also include any complicating factors and uncertainties that could significantly affect the cleanup activities, and list assumptions made for the cleanup strategy that are critical to the success of the activities. Provide justification for any sites categorized as medium or low Relative Risk Site Evaluation (RRSE) code that are funded ahead of sites categorized as high RRSE code 1 or 2. The overview also includes a table listing all studies completed to date for an installation. The installation may provide a map that highlights key sites in this section.

3. Site Description

The IAP must separately address each site in the AEDB-R (IRP) for an installation. Each site is described to include: general location, dimensions, site type, dates of operation, contaminants of concern, media of concern, RRSE rating or RAC, any special considerations, completed and current phase, and

recommendation for future responses. The Cleanup Strategy will describe any recommendation for future response and will include a discussion of strategy and assumptions, the type of response, why the response is necessary, when the future response will occur, and expected outcome.

If an installation has undergone Independent Technical Review (ITR) or site specific technical assistance, the IAP will contain a summary of the implemented recommendations and any progress towards those recommendations. The discussions should include any impediments to fully implementing recommendations and rationale for not implementing any recommendations for future response at a site.

DOD required each installation to evaluate all IR sites in AEDB-R for relative risk by the end of FY97. The contamination assessment must explain any "Not Evaluated" or "NE" entries with on-going or future remedial activities. Installations do not have to evaluate sites for relative risk in AEDB-R that are "response complete" or have "remedy in place."

Many installations have sites in AEDB-R that are active operations or concern lead-based paint or asbestos that are not eligible for ER,A funding. Each installation must be familiar with DERP eligibility requirements and plan execution only for eligible sites. If an AEDB-R site is active or otherwise not DERP eligible, it must be updated to response complete in AEDB-R and state "This site is not eligible for ER,A funding and is therefore response complete under the IRP." However, the installation must specify the appropriate program for addressing the site. Such sites would normally be in the compliance-related cleanup section of the IAP.

As long as the plan addresses each AEDB-R site with all data provided, it can address sites individually or combined into clusters by project, operable unit, site type, or "*response complete*" groups by program. See Appendix 3 for additional guidance.

4. Schedule

The schedule subsection of the IAP includes a chronological list and a graphic presentation by phase of all major milestones to include the start of the IRP to completion. The IAP format, outline, and example present very generalized required phase and schedule information. The installation may present a more detailed schedule if desired.

If an installation is on the NPL, the installation must detail the projected dates for the completion of construction of the final remedial action (remedy in place), submission of the Preliminary Closeout Report (PCOR), if required, submission of the Closeout Report (COR), and the projected deletion date from the NPL in the schedule. These IAP projected dates are for Army's internal use and are not

intended to serve as enforceable milestones or deadlines under an installation's NPL Federal Facility Agreement (FFA).

The IAP requires a RA Completion Date and IRP Completion Date. The RA and program completion dates may be different depending on the status of remedial action operations (RA(O)) and long-term management (LTM). In the DERP Annual Report to Congress, DoD considers "Completion" the fiscal year that the last remedial action will be completed at an installation. For cleanups requiring many years of RA(O) (i.e., ground-water treatment system), the "Completion" year would be the FY when the conditions in the Decision Document are met and the system can be turned off.

LTM may be required at sites after RA(O) is complete. Because the Army funds LTM from the ER,A, there can be no site closeout for IRP category responses at an installation until LTM is no longer required at a site. The IRP Completion Dates in General Section, Section 5, Installation Information, and the IAP Individual Program Summary, must include the LTM phase.

All dates given in this section must match dates in AEDB-R.

5. Cost

This subsection contains all funding information associated with the IRP at an installation, excluding program management costs.

Cost information for IRP includes a chronological list by phase of prior, current, and future year funding information from the inception of the IRP at the preliminary assessment phase to the projected completion of the program. Out-year funding requirements identify all investigation, remedial actions, RA(O)s, equipment replacement costs, five-year reviews, system decommissioning, and LTM.

The plan may present prior year funding data by phase at the project level. Current year and future funding data must be presented at the site-level and reflect the funding levels in the installation's obligation plan. The plan will present future funding in two spreadsheets. The first spreadsheet will represent the requirements or unconstrained cost (assumes no funding constraints) and the second will represent the programmed or constrained cost (based on programmed amounts set by the USAEC in AEDB-R). The spreadsheets must contain the site name, phase, phase cost estimate by fiscal year, and description of cost requirements, and source of cost estimate. The requirement spread represents the installation's ideal or most efficient annual funding allocation profile. The programmed estimate depicts the most efficient use of the currently projected annual allocations. The total programmed and requirements CTC estimates should be identical, with the only difference being how the budgets are spread over the years of execution.

While an installation is required to identify costs for Restoration Advisory Boards (RABs), Technical Review Committees (TRCs), and Technical Assistance for Public Participation (TAPP) in their obligation plan, these data do not have to be documented in the IAP. Administrative costs for RABs, TRCs, and TAPP requirements are program management costs.

In cases where the expected duration of either RA(O) or LTM is thirty years or longer, report the costs for these actions for a total of thirty years. There is little value in attempting to predict costs or durations beyond thirty years. The long-term obligation associated with the site is important to note. The text description can indicate that the expected duration may extend beyond thirty years. Any truncation at the thirty-year point is primarily for administrative consistency, and not meant to imply that the action will necessarily cease at that point.

MMRP CATEGORY SECTION

The following subsections will be included.

1. Summary

The Summary must have seven items completed for MMRP sites. The items include the following.

A - Total number of AEDB-R sites (MMRP) and number of sites that are Response Complete.

B - Site types.

C - Most widespread contaminants of concern.

D - Media of concern.

E - Completed removals (REM), interim remedial actions (IRA), remedial designs (RDs) and remedial actions (RAs) by program.

F - Total MMRP funding information from inception of the cleanup program to completion.

G - Duration of the cleanup program for an installation, to include the year of inception, the anticipated or actual year of completion of all remedial actions, and the anticipated or actual year of completion of the MMRP including long-term management.

The format for the Summary must be consistent with the format provided in Appendix 3.

2. *Contamination Assessment*

The contaminant assessment subsection of the IAP is a clear concise presentation of an installation's environmental restoration concerns for the MMRP. This subsection includes an overview of the program, list of previous studies, and individual site descriptions, requirements, and actions. The overview acts as an executive summary of the MMRP at the installation and includes a description of the general scope of the environmental problems and their significant impacts on human health and the environment that require some cleanup effort, as well as the type and overall scope of significant planned responses. It will list primary type(s) of contamination and affected media, describe the principal activities thought to contribute to past releases of contaminants, define any groundwater problems, and address any existing or potential for off post migration of contamination. This section also contains a summary of the program's exit strategy. This summary will include a detailed sequence and reasons for the sequence of cleanup activities to reach RIP/RC. Include in the strategy the process for receiving regulatory closure of each site by obtaining a "No Further Action" determination. It will also include any complicating factors and uncertainties that could significantly affect the cleanup activities, and list assumptions made for the cleanup strategy that are critical to the success of the activities. This section must provide justification for any sites categorized as Risk Assessment Code (RAC) 3, 4, or 5 that are funded ahead of sites categorized as RAC 1 or 2. The overview also includes a table listing all studies completed to date for an installation. The installation may provide a map that highlights key sites in this section.

3. Site Description

The IAP must separately address each MMRP site in the AEDB-R for an installation. Each site is described to include: general location, dimensions, site type, dates of operation, contaminants of concern, media of concern, RAC, any special considerations, completed and current phase, and recommendation for future responses. The Cleanup Strategy will describe any recommendation for future response and will include a discussion of strategy and assumptions, the type of response, the necessity of the response, when the future response will occur, and expected outcome.

If an installation has undergone Independent Technical Review (ITR) or site specific technical assistance, the IAP will contain a summary of the implemented recommendations and any progress towards those recommendations. The discussions should include any impediments to fully implementing recommendations and rationale for not implementing any recommendations for future response at a site.

Each installation must be familiar with DERP eligibility requirements and plan execution only for eligible sites. If an AEDB-R site is active or otherwise not

DERP eligible, it must be updated to response complete in AEDB-R and state "This site is not eligible for ER,A funding and is therefore response complete under the MMRP." However, the installation must specify the appropriate program for addressing the site. Such sites would normally be in the compliance-related cleanup section of the IAP.

As long as the plan addresses each AEDB-R site with all data provided, it can address sites individually or combined into clusters by project, operable unit, site type, or "*response complete*" groups by program. See Appendix 3 for additional guidance.

4. Schedule

The schedule subsection of the IAP includes a chronological list and a graphic presentation by phase of all major milestones to include the start of the MMRP to completion. The IAP format, outline, and example present very generalized required phase and schedule information. The installation may present a more detailed schedule if desired. In addition, installations should attach the IAP Report from AEDB-R to verify data in AEDB-R accurately reflects the information presented in the current IAP.

The IAP requires a RA Completion Date and MMRP Completion Dates. The RA and program completion dates may be different depending on the status of remedial action operations (RA(O)) and long-term management (LTM). In the DERP Annual Report to Congress, DoD considers "Completion" the fiscal year that the last remedial action will be completed at an installation. For cleanups requiring many years of RA(O) (i.e., ground-water treatment system), the "Completion" year would be the FY when the remedy meets the conditions of the Decision Document and the Army can turn off system.

Sites may require LTM after RA(O) is complete. Because the Army funds LTM from the ER,A, there can be no site closeout for MMRP category responses at an installation until LTM is no longer required at a site. The MMRP Completion Dates in General Section, Section 5, Installation Information, and the IAP Individual Program Summary must include the LTM phase.

All dates given in this section must match dates in AEDB-R.

5. Cost

This subsection contains all funding information associated with the MMRP at an installation, excluding program management costs.

Cost information for MMRP includes a chronological list by phase of prior, current, and future year funding information from the inception of the MMRP at the preliminary assessment phase to the projected completion of the two

programs. Out-year funding requirements identify all investigation, remedial actions, RA(O)s, equipment replacement costs, five-year reviews, system decommissioning, and LTM.

The plan may present prior year funding data by phase at the project level. Current year and future funding data must be presented at the site-level and reflect the funding levels in the installation's obligation plan. Two spreadsheets will present the future funding. The first spreadsheet will represent the requirements or unconstrained cost (assumes no funding constraints) and the second will represent the programmed or constrained cost (based on programmed amounts set by the USAEC in AEDB-R). The spreadsheets must contain the site name, phase, phase cost estimate by fiscal year, and description of cost requirements.

While an installation is required to identify costs for Restoration Advisory Boards (RABs), Technical Review Committees (TRCs), and Technical Assistance for Public Participation (TAPP) in their obligation plan, these data do not have to be documented in the IAP. Administrative costs for RABs, TRCs, and TAPP requirements are program management costs.

In cases where the expected duration of either RA(O) or LTM is thirty years or longer, report the costs for these actions for a total of thirty years. There is little value in attempting to predict costs or durations beyond thirty years. The long-term obligation associated with the site is important to note. The installation may use the text description to indicate that the expected duration may extend beyond thirty years. Any truncation at the thirty-year point is primarily for administrative consistency, and not meant to imply that the action will necessarily cease at that point.

BRAC AND EXCESS PROPERTIES (IRP, MMRP, CLOSURE-RELATED COMPLIANCE (BRAC)/CC (Excess), Natural and Cultural Resources, and Other Transfer/Environmental Issues) SECTION

The following subsections will be included.

1. Transfer Summary (if information is available)

The transfer summary subsection of the IAP presents the planned or actual transfer information for the installation. This subsection includes information about total installation acres, total acres to be transferred, a list of parcels, transfer strategy, land use, acres transferred, a list of any current or future early transfers, date of last transfer.

2. Individual program sections

The IAP must separately address each AEDB-R (Army DERP and Compliance) site, AEDB-CC sites for excess properties, as well as natural and cultural resources and other property transfer/environmental issues at an installation. The installation will divide the IAP by program until the installation develops a transfer strategy with defined parcels. At that time, the BIAP will group sites by parcel and not by program (See Appendix 3). Each parcel will cover all sites associated with that parcel (not dependent on program). The cover page for each parcel will list the parcel name, parcel size, list of sites associated with the parcel, expected transfer date, land use, any leases, permits, or licenses currently associated with the parcel and their length, transfer strategy, recipient, and any other issues that effect transfer of the parcel. A property disposal and reuse map will be attached to the parcel section.

ARMY DERP/COMPLIANCE PROGRAM SECTIONS

This section will include all BRAC/Excess sites reported in AEDB-R for the IRP, MMRP, and Closure-related compliance (BRAC)/CC (Excess) Programs (Compliance). Compliance sites include sites not eligible for Army DERP such as, but not limited to, underground or above ground storage tanks, hazardous material/waste management, solid waste management, polychlorinated biphenyls, asbestos, radon, RCRA facilities, NPDES permits, oil/water separators, radiological license decommissioning, explosive structure/equipment decontamination, and lead based paint.

The following subsections will be included.

1. Summary

The Summary must have seven items completed for IRP, MMRP, and Compliance category. The items include the following.

A - Total number of AEDB-R sites (Army DERP/Compliance) and number of sites that are Response Complete.

B - Site types.

C - Most widespread contaminants of concern.

D - Media of concern.

E - Completed removals (REM), interim remedial actions (IRA), remedial designs (RDs) and remedial actions (RAs).

F - Total funding information, from inception of the cleanup program (including ER,A funds) to completion.

G - Duration of Army DERP or Compliance Programs for an installation, to include the year of inception, the anticipated or actual year of completion of all remedial actions, and the anticipated or actual year of completion of the Army DERP or Compliance Program including long-term management. Duration of other issues impacting transfers that are not covered by Army DERP or Compliance Program.

The format for the Summary must be consistent with the format provided in Appendix 3.

2. Contamination Assessment

The contaminant assessment subsection of the BIAP is a clear concise presentation of an installation's environmental cleanup concerns for the IRP, MMRP, and Compliance. This subsection includes an overview of the program category, list of previous studies, and individual site descriptions, requirements, and actions. The overview acts as an executive summary of the IRP, MMRP, and Compliance categories at the installation and includes a description of the general scope of the environmental problems and their significant impacts on human health and the environment that require some cleanup effort, as well as the type and overall scope of significant planned responses. It will list primary type(s) of contamination and affected media, describe the principal activities thought to contribute to past releases of contaminants, define any groundwater problems, and address any existing or potential for off post migration of contamination. A summary of the program category's exit strategy and transfer strategy are also included in this section. This summary will include a detailed sequence and reasons for the sequence of cleanup activities to reach RIP/RC and transfer of the property. The process for receiving regulatory closure of each site by obtaining a "No Further Action" determination will be included in the strategy. It will also include any complicating factors and uncertainties that could significantly affect the cleanup activities, and list assumptions made for the cleanup strategy that are critical to the success of the activities. The overview also includes a table listing all studies completed to date for an installation. The installation may provide a map that highlights key sites in this section.

3. Site Descriptions

The IAP must separately address each site in the AEDB-R for an installation. Each site is described to include: general location, dimensions, site type, dates of operation, contaminants of concern, media of concern, RRSE rating or RAC, any special considerations, completed and current phase, and recommendation for future responses. The Cleanup Strategy will describe any recommendation for future response and will include a discussion of strategy and assumptions, the type of response, why the response is necessary, when the future response will occur, and expected outcome.

If an installation has undergone Independent Technical Review (ITR) or site specific technical assistance, the BIAP will contain a summary of the implemented recommendations and any progress towards those recommendations. The discussions should include any impediments to fully implementing recommendations and rationale for not implementing any recommendations for future response at a site.

DOD required each installation to evaluate all IR sites in AEDB-R for relative risk by the end of FY97. The site description must explain any "Not Evaluated" or "NE" entries with on-going or future remedial activities. Installations do not have to evaluate sites for relative risk in AEDB-R that are "response complete" or have "remedy in place."

As long as the plan addresses each AEDB-R site with all data provided, it can address sites individually or combined into clusters by project, operable unit, site type, or "*response complete*" groups by program. See Appendix 3 for additional guidance.

4. Schedule

The schedule subsection of the IAP includes an overall parcel transfer schedule with site, phase, and cost information. In addition, the BIAP includes a chronological list and a graphic presentation by phase of all major environmental milestones to include the start of the each program to completion. The BIAP format, outline, and example present very generalized required phase and schedule information. The installation may present additional detailed schedules.

If an installation is on the NPL, the installation must detail the projected dates for the completion of construction of the final remedial action (remedy in place), submission of the Preliminary Closeout Report (PCOR), if required, submission of the Closeout Report (COR), and the projected deletion date from the NPL in the schedule. These BIAP projected dates are for Army's internal use and are not intended to serve as enforceable milestones or deadlines under an installation's NPL Federal Facility Agreement (FFA).

The IAP requires a RA Completion Date and IRP Completion Date. The RA and program completion dates may be different depending on the status of remedial action operations (RA(O)) and long-term management (LTM). In the DERP Annual Report to Congress, DoD considers "Completion" the fiscal year that the last remedial action will be completed at an installation. For cleanups requiring many years of RA(O) (i.e., ground-water treatment system), the "Completion" year would be the FY when the remedy meets the conditions in the Decision Document and the installation can turn off the system.

LTM may be required at sites after RA(O) is complete. Because the Army funds LTM there can be no site closeout for responses at an installation until LTM is no

longer required at a site. The Completion Dates in General Section, Section 5, Installation Information, and the IAP Individual Program Summary, must include the LTM phase.

All dates given in this section must match dates in AEDB-R.

5. Cost

This subsection contains all funding information associated with each program at an installation, excluding program management costs.

Cost information includes a chronological list by phase of prior, current, and future year funding information from the inception of the Army DERP at the preliminary assessment phase to the projected completion of the program. Out-year funding requirements identify all investigation, remedial actions, RA(O)s, equipment replacement costs, five-year reviews, system decommissioning, and LTM.

The plan may present prior year funding data by project level. Current year and future funding data must be presented at the site-level and reflect the funding levels in the installation's workplan. The plan will present future funding in two spreadsheets if yearly programming amounts are available. The first spreadsheet will represent the requirements or unconstrained cost (assumes no funding constraints) and the second will represent the programmed or constrained cost (if available). The spreadsheets must contain the transfer parcel name, transfer date, site name, phase, phase cost estimate by fiscal year, and description of cost requirements. The requirement spread represents the installation's ideal or most efficient annual funding allocation profile. The programmed estimate depicts the most efficient use of the currently projected annual allocations. The total programmed and requirements CTC estimates should be identical, with the only difference being how the budgets are spread over the years of execution.

While an installation is required to identify costs for Restoration Advisory Boards (RABs), Technical Review Committees (TRCs), and Technical Assistance for Public Participation (TAPP) in their workplan, the BIAP need not document these data. Administrative costs for RABs, TRCs, and TAPP requirements are program management costs.

In cases where the expected duration of either RA(O) or LTM is thirty years or longer, report the costs for these actions for a total of thirty years. There is little value in attempting to predict costs or durations beyond thirty years. The long-term obligation associated with the site is important to note. The text description can indicate that the expected duration may extend beyond thirty years. Any truncation at the thirty-year point is primarily for administrative consistency, and not meant to imply that the action will necessarily cease at that point.

NATURAL AND CULTURAL RESOURCES AND OTHER PROPERTY TRANSFER/ENVIRONMENTAL ISSUES PROGRAM SECTIONS

Natural and cultural resources include information on vegetation/habitat types, distribution of wetlands, rare, threatened, or endangered plants or animal species, distribution of sensitive plants and animal species, distribution of sensitive habitats and natural communities, and historical and cultural resource sites. If an installation is divided into various parcels, the beginning of the Parcel section should discuss the natural and cultural resources affecting the transfer of an individual parcel.

Other property transfer/environmental issues are projects not previously captured in other programs that are affecting property transfer. If an installation is divided into various parcels, the beginning of the Parcel section should discuss the other property transfer/environmental issues affecting the transfer of an individual parcel.

The following subsections will be included.

1. Summary

The General Summary of Summary must have seven items completed for IRP, MMRP, and Compliance category. The items include the following.

2. Contamination Assessment

This subsection includes an overview of the program category, list of previous studies, and individual project descriptions, requirements, and actions. The overview acts as an executive summary.

3. Schedule

The schedule subsection of the BIAP includes an overall parcel transfer schedule with site, phase, and cost information (Installation to Parcel to AEDB-R Sites to CERCLA Phase Matrix). In addition, the BIAP includes a chronological list and a graphic presentation by phase of all major project milestones to include the start

4. Cost

This subsection contains all funding information associated with each natural and cultural resources or other projects at an installation.

ALL Programs

8. Community Involvement

This subsection addresses the community involvement status of the IRP at an installation. Installations should identify whether a Restoration Advisory Board (RAB) or Technical Review Committee (TRCs) with community members has been formed and when the RAB/TRC was formed.

Because the Army strongly encourages local community involvement during investigations and cleanup actions at all Army sites, each installation participating in the IRP must determine community interest in establishing and participating in a RAB.

When an installation queries the local community and determines there is no community interest in a RAB, the installation must document the following in their IAP.

- Efforts taken to determine interest.
- Results of the efforts.
- Conclusion that there is no community interest.
- Follow-up procedures to monitor the level of community interest in RABs.

IRP Installations with no RAB must evaluate community interest at a minimum of every two years.

Community members of RABs and TRCs are able to apply to installations for technical assistance through the Technical Assistance for Public Participation (TAPP) Program. This subsection must identify potential TAPP projects.

COMPLIANCE-RELATED CLEANUP SECTION

The following subsections will be included in a separate IAP.

1. Summary

The Summary must have five items completed if compliance-related cleanup (CC) is ongoing at the installation. The items include the following.

A - Total number of number of compliance-related cleanup sites.

B - Site types.

C - Most widespread contaminants.

D – Media concern.

E - Completed removals (REM), interim remedial actions (IRA), remedial designs (DES) and corrective measures implementations (CMIs). This is not required for NGB or Reserves.

The format for the Summary must be consistent with the format provided in Appendix 4.

2. *Contamination Assessment*

The contaminant assessment subsection of the IAP is a clear concise presentation of an installation's environmental restoration concerns for the CC program. This subsection includes an overview of the program, list of previous studies, and individual site descriptions, requirements, and actions. The overview acts as an executive summary of the CC program at the installation and includes a description of the general scope of the environmental problems and their regulator driver that require some cleanup effort, as well as the type and overall scope of significant planned responses. It should list primary type(s) of contamination and affected media, describe the principal activities thought to contribute to releases of contaminants, define any groundwater problems, and address any existing or potential for off post migration of contamination. A summary of the program's exit strategy is also included in this section. This summary will include a detailed sequence of cleanup activities to reach RIP/RC. Include in the strategy the process for receiving regulatory closure of each site by obtaining a "No Further Action" determination. It will also include any complicating factors and uncertainties that could significantly affect the cleanup activities, and list assumptions made for the cleanup strategy that are critical to the success of the activities. The overview also includes a table listing all studies completed to date for an installation. The installation may provide a map that highlights key sites in this section.

3. Site Description

The IAP must separately address each site in the AEDB-CC for an installation. Each site is described to include: general location, dimensions, site type, regulatory driver, dates of operation, contaminants of concern, media of concern, any special considerations, and recommendation for future responses. The Cleanup Strategy will describe any recommendation for future response and will include a discussion of strategy and assumptions, the type of response, why the response is necessary, when the future response will occur, and expected outcome.

As long as the installation provides all data and addresses each AEDB-CC site, it may address sites individually or combined into clusters by project, operable unit, site type, or "*response complete*" groups by program. See Appendix 4 for additional guidance.

4. Schedule

Installations may address a general schedule for completion of CC sites in this sub-section of the IAP. Future milestones are presented in a chart generated by AEDB-CC phase data.

All dates given in this section must match dates in AEDB-CC.

5. Cost

This subsection contains all funding information associated with the CC program at an installation, excluding program management costs.

Cost information for CC includes a chronological list by project and phase of prior, current, and future year funding information from the inception of the CC at the initiation of the compliance-related cleanup program to the projected completion of the program. This data will reflect cost submitted in the AEDB-CC. Out-year funding requirements identify all investigation, corrective measures implementation operations, (CMI(O)s), equipment replacement costs, five-year reviews where required, system decommissioning, and LTM. A sample spreadsheet is found in Appendix 4.

The IAP CC spreadsheet may present prior year funding data by phase at the project level. It must present current year requirements and future funding data at the site-level. The spreadsheet will represent the requirements or unconstrained cost (assumes no funding constraints) and must match AEDB-CC. The spreadsheet must contain the site name, phase, phase cost estimate by fiscal year, and description of cost requirements.

This program is not eligible for TAPP.

In cases where the Army expects either CMI(O) or LTM to take place for thirty years or longer, report the costs for these actions for a total of thirty years. There is little value in attempting to predict costs or durations beyond thirty years. The long-term obligation associated with the site is important to note. The installation may use the text description to indicate that the expected duration may extend beyond thirty years. Any truncation at the thirty-year point is primarily for administrative consistency, and not meant to imply that the action will necessarily cease at that point.

6. Community Involvement

This section is only included if there is public involvement.

This subsection addresses the community involvement status of the CC at an installation.

This section should address a general description of community involvement in the CC program. Although community involvement is not required unless a condition of a permit, enforcement action, or interagency agreement, it is recommended to obtain regulatory and public buy-in on cleanup strategies. This will help to minimize any controversial issues, which may delay projects.

APPENDIX 3

Outline for IRP, MMRP, and BRAC IAP

INSTALLATION ACTION PLAN OUTLINE for IRP, MMRP, and BRAC

I. TABLE OF CONTENTS

II. STATEMENT OF PURPOSE

A. Define purpose of IAP
B. State Regulator and Public Involvement in preparing IAP
C. List date and participants of IAP Workshop

III. APPROVAL/CONCURRENCE PAGE

A. Approval

- Signature of the Installation commander, Garrison commander, or officially designated signature authority with appropriate signature block and date

B. Concurrence

1. Signature of BRAC D, for BRAC sites if included in IAP, with appropriate signature and date

2. Signature of the Branch Chief and the Chief of the Cleanup Division at the USAEC, for Active sites, with appropriate signature block and date

IV. ACRONYMS AND ABBREVIATIONS

In addition to a standard acronym list the following items can be inserted as needed:

- A conversion chart of RCRA and CERCLA terms.
- A crosswalk between AEDB-R Sites IDs and other names used by the installation.

V. INSTALLATION INFORMATION

A. Installation Locale
    1. City, County and State
        - o approximate situation to high population densities
    2. Size (in acres)
B. Installation Mission
C. Command Organization

1. Major Command and Subcommand (if applicable) and/or IMA Region
    - identification of organization within commands responsible for the Cleanup Program
2. Installation
    - identification of organization within installation responsible for the Cleanup Program
3. Executing Agency
    a. Investigation Phase Executing Agency
    b. Remedial Action Phase Executing Agency

D. Regulator Participation
1. Federal - identification of regulating USEPA region & branch
2. State - identification of regulating State agency

E. NPL Status (yes or no)
1. Score and Date
2. Projected dates for construction complete and NPL delisting

F. Restoration Advisory Board/Technical Review Committee/TAPP Status

G. Program Summaries

<u>IRP</u>
- Primary contaminants
- Affected media
- Estimated date for RIP/RC
- Funding to date
- Current year funding
- CTC

<u>MMRP</u>
- Primary contaminants
- Affected media
- Estimated date for RIP/RC
- Funding to date
- Current year funding
- CTC

<u>BRAC</u>
- Primary contaminants
- Affected media
- Estimated date for RIP/RC
    - IRP
    - MMRP
- Funding to date
    - IRP
    - MMRP
- Current year funding
    - IRP
    - MMRP
- CTC

- o IRP
- o MMRP
- o Compliance

VI. CLEANUP PROGRAM SUMMARY

A. Historic Activity
1. When Opened
2. Purpose of Installation
-- e.g., ammunition production, training, information systems repair (emphasis on activities that may have caused contamination of the environment)
3. Periods of Inactivity
4. Major Tenant Operations
    a. history
    b. type of operation
5. NPL installations –cause for listing (if applicable)
6. USEPA RCRA GPRA information (if applicable)

B. Program Progress

IRP
- Progress to date
- Future plan of action

MMRP
- Progress to date
- Future plan of action

BRAC
- IRP Progress to date
- IRP Future plan of action
- MMRP Progress to date
- MMRP Future plan of action

VII. INDIVIDUAL PROGRAM SECTIONS

A. IRP

1. SUMMARY

A. Total Number of AEDB-R IRP Sites and Number of AEDB-R IRP Sites with Response Complete (RC) -- e.g., 36/10.
B. Different Site Types -- e.g., 12 landfills, 2 lagoons, 6 disposal pits
C. Most Widespread Contaminants of Concern -- e.g., chromium, petroleum/oil/lubricants
D. Media of Concern -- e.g., groundwater, soil
E. Completed REM/IRA/RA List Action, Year, Total Cost -- e.g., Soil Incineration (1988) Total Cost $9,209,000; Waterline Extension (1986) Total Cost $5,269,000

F. Total IRP Funding --List all prior year funds, current year funds, and future (CTC) requirements, then total.
G. Year of IRP inception, year of IRP RIP/RC, year of IRP completion (including LTM Phase)

2. CONTAMINATION ASSESSMENT

A. Assessment Overview (cleanup program executive summary)
    1. Initiation of Cleanup Program
        a. when
        b. why
    2. Description of major program concerns
        a. off-post contamination and responses (if any)
        b. regulatory interest (if any)
        c. complicating factors and uncertainties (if any)
        d. public interest (if any)
    3. Responses to date addressing major IRP concerns (if any)
        a. investigations completed and ongoing
        b. remedial actions completed or ongoing
B. Cleanup Exit Strategy
        a. sequence of events and reason for sequence
        b. assumptions made for strategy
        c. process for receiving regulatory closure
C. Include table of all studies completed
    --e.g., Year, Reports/DDs, Author, Date
D. Include map(s) of key sites

3. SITE DESCRIPTION (by operable unit when applicable)

A. Identification by AEDB-R site ID and name
B. General site description (location, size or dimension, and type)
C. Site history
D. Cleanup Strategy
    recommendations for future phase
        -- anticipated investigation phase or REM/IRA/RA/RA(O)/LTM strategy
        -- why future phase is needed
        -- type of remediation anticipated
        -- status of any ITR recommendations
E. Status Box
    1. Regulatory driver
    2. RRSE
    3. Contaminants of concern
    4. Media of concern
    5. Phase information
    6. RIP Date
    7. RC Date

F. Site photo(s) or maps (if applicable)

4. RESPONSE COMPLETE AEDB-R SITES

A. Site ID
B. Date response complete
C. Reason and documentation for response complete

5. SCHEDULE

A. Start Date of IRP at Installation
B. Past Phase Completion Milestones
C. Projected ROD/DD (title) projected approval date and associated sites
D. Projected construction complete
E. Projected NPL Deletion Date
F. Schedule for 5 year reviews
G. Estimated Completion Date of IRP at Installation (include LTM phase)
H. Projected Phase Completion Milestones (chart)

6. COST

A. Prior year funding
    1. List by site/project, phase, and cost
    2. Include AEDB-R site ID
B. Current Year Funding
    1. List by site, phase, and cost
    2. Current year costs must match Obligation Plan
    3. Include AEDB-R site ID
C. Total Future Requirements
D. Total Program Cost (from inception to completion of the IRP)
E. Future Requirements (2 spreadsheets – requirements (unconstrained) and programmed (constrained))
    1. Detailed spreadsheet listed by site id, site name, phase, cost by FY, and description of cost
    2. Include AEDB-R site ID
    3. Cost requirements must match requirements in AEDB-R

B. MMRP

1. SUMMARY

A. Total Number of AEDB-R MMRP Sites and Number of AEDB-R MMRP Sites with Response Complete (RC) -- e.g., 10/2.
B. Different Site Types (list most significant site types) -- e.g., 2 ranges, 1 OB/OD
C. Most Widespread Contaminants of Concern -- e.g., RDX, TNT
D. Media of Concern -- e.g., groundwater, soil

E. Completed REM/IRA/RA, List Action, Year, Total Cost -- e.g., Soil Incineration (1988) Total Cost $864,000; Surface sweep (1986) Total Cost $2,435,000
F. Total MMRP Funding, List all prior year funds, current year funds, and future CTC) requirements, then total.
G. Duration of MMRP, Year of MMRP inception, year of MMRP RIP/RC, year of MMRP completion (including LTM Phase)

2. CONTAMINATION ASSESSMENT

A. Assessment Overview (cleanup program executive summary)
    1. Initiation of Cleanup Program
        a. when
        b. why
    2. Description of major program concerns
        a. off-post contamination and responses (if any)
        b. regulatory interest (if any)
        c. complicating factors and uncertainties (if any)
        d. public interest (if any)
    3. Responses to date addressing major IRP concerns (if any)
        a. investigations completed and ongoing
        b. remedial actions completed or ongoing
B. Cleanup Exit Strategy
        a. sequence of events and reason for sequence
        b. assumptions made for strategy
        c. process for receiving regulatory closure
C. Include table of all studies completed
    --e.g., Year, Reports/DDs, Author, Date
D. Include map(s) of key sites

3. SITE DESCRIPTION (by operable unit when applicable)

A. Identification by AEDB-R site ID and name
B. General site description (location, size or dimension, and type)
C. Site history
D. Cleanup Strategy
    recommendations for future phase
        -- anticipated investigation phase or
        REM/IRA/RA/RA(O)/LTM strategy
        -- why future phase is needed
        -- type of remediation anticipated
        -- status of any ITR recommendations
E. Status Box
    1. Regulatory driver
    2. RAC
    3. Contaminants of concern
    4. Media of concern

5. Phase information
6. RIP Date
7. RC Date

F. Site photo(s) or maps (if applicable)

4. RESPONSE COMPLETE AEDB-R SITES

A. Site ID
B. Date response complete
C. Reason and documentation for response complete

5. SCHEDULE

A. Start Date of MMRP at Installation
B. Past Phase Completion Milestones
C. Projected ROD/DD (title), projected approval date and associated sites
D. Projected construction complete
E. Schedule for 5 year reviews
F. Estimated Completion Date of MMRP at Installation
G. Projected Phase Completion Milestones (chart)

6. COST

A. Prior year funding
   1. List by site/project, phase, and cost
   2. Include AEDB-R site numbers
B. Current Year Funding
   1. List by site, phase, and cost
   2. Current year costs must match Obligation Plan
   3. Include AEDB-R site numbers
C. Total Future Requirements
D. Total Program Cost (from inception to completion of the IRP)
E. Future Requirements (2 spreadsheets – requirements (unconstrained) and programmed (constrained))
   1. Detailed spreadsheet listed by site id, site name, phase, cost by FY, and description of cost
   2. Include AEDB-R site numbers
   3. Include source of cost estimate
   4. Include start and end date for each phase on programmed spreadsheet
   5. Cost requirements must match requirements in AEDB-R

C. BRAC and Excess (IRP, MMRP, Closure-related Compliance (BRAC)/CC (Excess), Natural and Cultural Resources, and Other Transfer/Environmental Issues)

For Installations without complete parcel information

1. TRANSFER SUMMARY (provide if information is available)

A. Total Acres:

B. Total Acres Transferred:

C. Parcel(s) - For parcel provide the following:
- Recipient organization
- Total Acres
- Transfer Strategy (eg. Economic development conveyance, public sale)
- Current Land Use
- Future Land Use
- Acres Transferred
- Actual early transfer, lease, permit, or license acreage
- Planned early transfer, lease, permit, or license acreage

2. INDIVIDUAL PROGRAM SECTIONS

IRP

1. SUMMARY

A. Total Number of AEDB-R Sites and Number of AEDB-R Sites with Response Complete (RC) -- e.g., 36/10.
B. Different Site Types -- e.g., 12 landfills, 2 lagoons, 6 disposal pits
C. Most Widespread Contaminants of Concern -- e.g., chromium, petroleum/oil/lubricants
D. Media of Concern -- e.g., groundwater, soil
E. Completed REM/IRA/RA List Action, Year, Total Cost -- e.g., Soil Incineration (1988) Total Cost $9,209,000; Waterline Extension (1986) Total Cost $5,269,000
F. Total Funding --List all prior year funds, current year funds, and future (CTC) requirements, then total.
G. Duration of IRP, Year of IRP inception, year of IRP RIP/RC, year of IRP completion (including LTM Phase)

2. CONTAMINATION ASSESSMENT

A. Assessment Overview (cleanup program executive summary)
    1. Initiation of Cleanup Program
        a. when
        b. why
    2. Description of major program concerns
        a. off-post contamination and responses (if any)

b. regulatory interest (if any)
c. complicating factors and uncertainties (if any)
d. public interest (if any)

3. Responses to date addressing major IRP concerns (if any)
a. investigations completed and ongoing
b. remedial actions completed or ongoing

B. Cleanup Exit Strategy
a. sequence of events and reason for sequence
b. assumptions made for strategy
c. process for receiving regulatory closure

C. Include table of all studies completed

D. Include map(s) of key sites if available

3. SITE DESCRIPTIONS (by operable unit when applicable)

A. Identification by AEDB-R site ID and name

B. General site description (location, size or dimension, and type)

C. Historical Activities
(include status of any ITR recommendations)

D. Cleanup Strategy
recommendation for future phase (exit strategy)
-- anticipated investigation phase or REM/IRA/RA/RA(O)/LTM strategy
-- why future phase is needed
-- type of remediation anticipated

E. Status Box
1. Regulatory driver
2. RRSE
3. Contaminants of concern
4. Media of concern
5. Phase information
6. RIP Date
7. RC Date

F. Site photo(s) or maps (if applicable)

4. RESPONSE COMPLETE AEDB-R SITES

A. Site ID

B. Date response complete

C. Reason and documentation for response complete

5. SCHEDULE

A. Start Date of IRP at Installation (Include activities that occurred before the installation became BRAC)
B. Past Phase Completion Milestones
C. Projected ROD/DD (title), projected approval date and associated sites
D. Projected construction complete
E. Projected NPL Deletion Date
F. Schedule for 5 year reviews
G. Estimated Completion Date of IRP at Installation (include LTM phase)
H. Projected Phase Completion Milestones (chart)

6. COST

A. Prior years funding
    1. List by site/project, phase, and cost
    2. Include AEDB-R site ID
B. Current Year Funding
    1. List by site, phase, and cost
    2. Current year costs must match Work Plan
    3. Include AEDB-R site ID
D. Total Future Requirements
E. Total Program Cost (from inception to completion of the IRP)
C. Future Requirements (spreadsheet of requirements (unconstrained))
Future cost can be combined with other programs on the spreadsheet.
    1. Detailed spreadsheet listed by site id, site name, phase, cost by FY, and description of cost
    2. Include AEDB-R site ID
    3. Cost requirements must match requirements in AEDB-R

MMRP

1. SUMMARY

A. Total Number of AEDB-R MMRP Sites and Number of AEDB-R MMRP Sites with Response Complete (RC) -- e.g., 2/10.
B. Crosswalk from UXO to MMRP site IDS
C. Different Site Types (list most significant site types) -- e.g., 2 ranges, 1 OB/OD
D. Most Widespread Contaminants of Concern -- e.g., RDX, TNT
E. Media of Concern -- e.g., groundwater, soil
F. Completed REM/IRA/RA, List Action, Year, Total Cost -- e.g., Soil Incineration (1988) Total Cost $864,000; Surface sweep (1986) Total Cost $2,435,000
G. Total MMRP Funding, List all prior year funds, current year funds, and future CTC) requirements, then total.
H. Duration of MMRP, Year of MMRP inception, year of MMRP RIP/RC, year of MMRP completion (including LTM Phase)

2. CONTAMINATION ASSESSMENT

A. Assessment Overview (cleanup program executive summary)
    1. Initiation of Cleanup Program
        a. when
        b. why
    2. Description of major program concerns
        a. off-post contamination and responses (if any)
        b. regulatory interest (if any)
        c. complicating factors and uncertainties (if any)
        d. public interest (if any)
    3. Responses to date addressing major IRP concerns (if any)
        a. investigations completed and ongoing
        b. remedial actions completed or ongoing
B. Cleanup Exit Strategy
        a. sequence of events and reason for sequence
        b. assumptions made for strategy
        c. process for receiving regulatory closure
C. Include table of all studies completed
D. Include map(s) of key sites if available

3. SITE DESCRIPTIONS (by operable unit when applicable)

A. Identification by AEDB-R site ID and name
B. General site description (location, size or dimension, and type)
C. Historical Activities
    (include status of any ITR recommendations)
D. Cleanup Strategy
    recommendation for future phase (exit strategy)
        -- anticipated investigation phase or
        REM/IRA/RA/RA(O)/LTM strategy
        -- why future phase is needed
        -- type of remediation anticipated
E. Status Box
    1. Regulatory driver
    2. RAC
    3. Contaminants of concern
    4. Media of concern
    5. Phase information
    6. RIP Date
    7. RC Date
F. Site photo(s) or maps (if applicable)

4. RESPONSE COMPLETE AEDB-R SITES

A. Site ID
B. Date response complete

C. Reason and documentation for response complete

5. SCHEDULE

A. Start Date of MMRP at Installation (Include UXO site activities)
B. Past Phase Completion Milestones
C. Projected ROD/DD (title) projected approval date and associated sites
D. Projected construction complete
E. Schedule for 5 year reviews
F. Estimated Completion Date of MMRP at Installation
G. Projected Phase Completion Milestones (chart)

6. COST

A. Prior years funding
    1. List by site/project, phase, and cost
    2. Include AEDB-R site numbers
B. Current Year Funding
    1. List by site, phase, and cost
    2. Current year costs must match Work Plan
    3. Include AEDB-R site numbers
C. Total Future Requirements
D. Total Program Cost (from inception to completion of the MMRP)
E. Future Requirements (spreadsheet of requirements (unconstrained))

Future cost can be combined with other programs on the spreadsheet.

    1. Detailed spreadsheet listed by site id, site name, phase, cost by FY, and description of cost
    2. Include AEDB-R site numbers
    3. Cost requirements must match requirements in AEDB-R

Closure-related Compliance (BRAC)/ CC (EXCESS) Program

1. SUMMARY

A. Total Number of AEDB-R Compliance Sites and Number of AEDB-R Compliance Sites with Response Complete (RC) -- e.g., 2/10.
B. Different Site Types (list most significant site types) -- e.g., 2 ranges, 1 OB/OD
C. Most Widespread Contaminants of Concern -- e.g., RDX, TNT
D. Media of Concern -- e.g., groundwater, soil
E. Completed REM/IRA/RA, List Action, Year, Total Cost -- e.g., Soil Incineration (1988) Total Cost $864,000; Surface sweep (1986) Total Cost $2,435,000

2. CONTAMINATION ASSESSMENT

A. Assessment Overview (cleanup program executive summary)
    1. Initiation of Cleanup Program

a. when
b. why

2. Description of major program concerns
   a. off-post contamination and responses (if any)
   b. regulatory interest (if any)
   c. complicating factors and uncertainties (if any)
   d. public interest (if any)

3. Responses to date addressing major IRP concerns (if any)
   a. investigations completed and ongoing
   b. remedial actions completed or ongoing

B. Cleanup Exit Strategy
   a. sequence of events and reason for sequence
   b. assumptions made for strategy
   c. process for receiving regulatory closure

C. Include table of all studies completed

D. Include map(s) of key sites if available

3. SITE DESCRIPTIONS (by operable unit when applicable)

A. Identification by AEDB-R site ID and name

B. General site description (location, size or dimension, and type)

C. Historical Activities
   (include status of any ITR recommendations)

D. Cleanup Strategy
   recommendation for future phase (exit strategy)
   -- anticipated investigation phase or REM/IRA/RA/RA(O)/LTM strategy
   -- why future phase is needed
   -- type of remediation anticipated

E. Status Box
1. Regulatory driver
2. Contaminants of concern
3. Media of concern
4. Phase information
5. RIP Date
6. RC Date

F. Site photo(s) or maps (if applicable)

4. RESPONSE COMPLETE AEDB-R SITES

A. Site ID

B. Date response complete

C. Reason and documentation for response complete

5. SCHEDULE

General Closure-related Compliance Program Schedule (chart from AEDB-R data)

6. COST

A. Prior years funding
    1. List by site/project, phase, and cost
    2. Include AEDB-R site numbers
B. Current Year Funding
    1. List by site, phase, and cost
    2. Current year costs must match Work Plan
    3. Include AEDB-R site numbers
C. Total Future Requirements
D. Total Program Cost (from inception to completion of the Closure-related compliance)
E. Future Requirements (spreadsheet of requirements (unconstrained))
Future cost can be combined with other programs on the spreadsheet.
    1. Detailed spreadsheet listed by site, phase, cost by FY, and description of cost
    2. Include AEDB-R site numbers
    3. Cost requirements must match requirements in AEDB-R

NATURAL AND CULTURAL RESOURCES PROGRAM SECTION

1. GENERAL PROJECT DESCRIPTIONS

A. Vegetation/habitat types

B. Distribution of wetlands

C. Rare, threatened, or endangered plants or animal species

D. Distribution of sensitive plants and animal species

E. Distribution of sensitive habitats and natural communities

F. Historical and cultural resource sites

2. SCHEDULE

General Natural and Cultural Resources Program Schedule

3. COST

A. Current Year Funding

List by project

B. Future

Detailed spreadsheet listed by project, cost by FY, and description of cost

OTHER PROPERTY TRANSFER/ENVIRONMENTAL ISSUES EFFECTING TRANSFER OF PROPERTY

1. GENERAL PROJECT DESCRIPTIONS

2. SCHEDULE

General Natural and Cultural Resources Program Schedule

3. COST

A. Current Year Funding

List by project

B. Future Funding

Detailed spreadsheet listed by project, cost by FY, and description of cost

D. BRAC and Excess (IRP, MMRP, Closure-related Compliance (BRAC)/CC (Excess), Natural and Cultural Resources, and Other Transfer/Environmental Issues)

For Installations with parcel information

1. TRANSFER SUMMARY

A. Total Acres:

B. Total Acres Transferred:

C. Parcel(s) - For each parcel provide the following:

- Recipient organization
- Total Acres
- Transfer Strategy (e.g. Economic development conveyance, public sale)
- Current Land Use
- Future Land Use
- Acres Transferred
- Actual early transfer, lease, permit, or license acreage
- Planned early transfer, lease, permit, or license acreage

2. PARCEL SECTIONS

A. Cover Page for each Parcel

- Parcel name
- Parcel size
- List of AEDB-R sites associated with the parcel
- Expected transfer date,
- Current land use
- Future land use
- Any leases, permits, or licenses currently associated with the parcel and their length Transfer strategy
- Recipient
- Other issues that effect transfer of the parcel.

A property disposal and reuse map will be attached to the parcel section.

B. Site descriptions
    1. Identification by AEDB-R site ID and name
    2. General site description (location, size or dimension, and type)
    3. Site history
    4. Cleanup Strategy
        a. recommendation for future phase
        -- anticipated investigation phase or
        REM/IRA/RA(C)/CMI(C)/RA(O)/CMI(O)/LTM strategy
        -- why future phase is needed
        -- type of remediation anticipated
        b. exit strategy
    5. Status Box
        a. Regulatory driver
        b. RRSE/RAC
        c. Program (IRP, MMRP, C, Other)
        d. Contaminants of concern
        e. Media of concern
        f. Phase information
        g. RIP Date
        h. RC Date
    6. Site photo(s) or maps (if applicable)

C. Response complete AEDB-R sites
    1. Site ID
    2. Date response complete
    3. Reason and documentation for response complete

3. SCHEDULE FOR IRP, MMRP, AND CLOSURE RELATED COMPLIANCE (BRAC)/CC (EXCESS) PROGRAMS

A. Past Phase Completion Milestones
B. Projected ROD/DD (title), projected approval date and associated sites
C. Projected construction complete

D. Projected NPL Deletion Date
E. Schedule for 5-year reviews
F. Estimated Completion Date of Cleanup at Installation (include LTM phase and denote if completions is indefinite because of contamination being left in place)
G. Projected Phase Completion Milestones (chart)

4. SCHEDULE FOR NATURAL AND CULTURAL RESOURCES PROGRAM AND OTHER PROERTY TRANSFER/ENVIRONMENTAL ISSUES SECTION

General Natural and Cultural Resources Program and Other property transfer/environmental issues Schedule

5. COST FOR IRP, MMRP, AND CLOSURE RELATED COMPLIANCE (BRAC)/CC(EXCESS) PROGRAMS

A. Prior year funding
    1. List by site/project, phase, and cost
    2. Include AEDB-R site ID
B. Current Year Funding
    1. List by site, phase, and cost
    2. Current year costs must match Work Plan
    3. Include AEDB-R site ID
C. Total Future Requirements
D. Total Program Cost (from inception to completion of the IRP)
E. Future Requirements (spreadsheet of requirements (unconstrained))
Future cost can be combined with other programs on the spreadsheet.
    1. Detailed spreadsheet listed by site id, site name, phase, cost by FY, and description of cost
    2. Include AEDB-R site ID
    3. Cost requirements must match requirements in AEDB-R

6. COST FOR NATURAL AND CULTURAL RESOURCES PROGRAM AND OTHER PROERTY TRANSFER/ENVIRONMENTAL ISSUES SECTION

A. Current Year Funding
    List by project
B. Future
    Detailed spreadsheet listed by project, cost by FY, and description of cost

ALL PROGRAMS -

VIII. COMMUNITY INVOLVEMENT

A. Community Involvement Status

1. Technical Review Committee (date established)
2. Restoration Advisory Board (date established)
3. Date of Community Relations Plan

B. If no Community Interest in a RAB (For installations where a RAB was not established due to lack of community interest).

1. Efforts Taken to Determine Interest
   -Include any action taken to determine interest, e.g., surveys, public meetings, advertisements, etc.
2. Results
   -Include results of each action taken to determine interest
3. Follow-up Procedures
   -Include how often follow-up procedures to monitor any changes in community interest are planned.

C. Technical Assistance for Public Participation (TAPP)

1. Current TAPP (date and project title)
2. Potential TAPP

APPENDIX 4

Outline for CC IAP

INSTALLATION ACTION PLAN OUTLINE for CC

1. TABLE OF CONTENTS

2. STATEMENT OF PURPOSE

A. Define purpose of IAP
B. State Regulator and Public Involvement in preparing IAP (if any)
C. List date and participants of IAP Workshop

3. APPROVAL/CONCURRENCE PAGE

A. Approval

- Signature of the Installation commander, Garrison commander, TAG, or officially designated signature authority with appropriate signature block and date

B. Concurrence

- Signature of IMA Region, MACOM, or NGB and date

4. ACRONYMS AND ABBREVIATIONS

5. INSTALLATION INFORMATION

A. Installation Locale (List State for NGB and Regional Readiness Command for Reserves)
    1. City, County and State
        - o approximate situation to high population densities
    2. Size (in acres)
B. Installation (State for NGB, Regional Readiness Command for Reserves) Mission
C. Command Organization
    1. Major Command and Subcommand (if applicable) and/or IMA Region
        - o identification of organization within commands responsible for the Cleanup Program
    2. Installation
        - o identification of organization within installation
    3. Lead Executor
        a. Investigation Phase Executing Agency
        b. Remedial Action Phase Executing Agency
D. Regulator Participation
    1. Federal - identification of regulating USEPA region & branch
    2. State - identification of regulating State agency

6. CLEANUP PROGRAM SUMMARY (Not required for NGB and Reserves)

Installation's Historic Activity

1. When Opened
2. Purpose of Installation
   -- e.g., ammunition production, training, information systems repair (emphasis on activities that may have caused contamination of the environment)
3. Periods of Inactivity
4. Major Tenant Operations
   a. history
   b. type of operation

COMPLIANCE-RELATED CLEANUP PROGRAM SECTION

1. SUMMARY

A. Total Number of Sites
B. Different Site Types with associated site IDs
-- e.g., 1 landfills, 2 USTs
C. Most Widespread Contaminants of Concern
-- e.g., petroleum/oil/lubricants, explosives
D. Media of Concern
-- e.g., groundwater, soil
E. Completed REM/IRA/CMI (not required for NGB and Reserves)
List Action, Year, Total Cost
-- e.g., Soil Incineration (1988) ..... Total Cost $ 9,209,000
Free Product Removal (1986) ... Total Cost $ 269,000

2. CONTAMINATION ASSESSMENT

A. Assessment Overview (cleanup program executive summary)

1. Initiation of Cleanup Program
   a. when
   b. why
2. Description of major program concerns
   a. off-post contamination and responses (if any)
   b. regulatory interest (if any)
   c. complicating factors and uncertainties (if any)
   d. public interest (if any)
3. Responses to date addressing major CC concerns (if any)
   a. investigations completed and ongoing
   b. remedial actions completed or ongoing

B. Cleanup Exit Strategy

   a. sequence of events and reason for sequence

b. assumptions made for strategy
c. process for receiving regulatory closure

C. Include table of all studies/reports completed with associated site(s) --e.g., Associated Site(s), Reports/DDs, Date (sort by site and then date)
D. Include map(s) of key sites if available

3. SITE DECRIPTIONS

A. Identification by site ID and/or name
B. General site description (location, size or dimension, and type)
C. Historical Site Information
D. Current Site Activities
E. Cleanup Strategy
recommendation for future phase
-- anticipated investigation phase or REM/IRA/CMI(C)/CMI(O)/LTM strategy
-- why future phase is needed
-- type of remediation anticipated
F. Status Box
1. Regulatory driver
2. Contaminants of concern
3. Media of concern
4. Phase information
5. RIP date
6. RC date
G. Site photo(s) or maps (if applicable)

4. RESPONSE COMPLETE AEDB-CC SITES

A. Site ID, Name
B. Date response complete
C. Reason and documentation for response complete

5. SCHEDULE

A. Completed Milestones by FY
B. Future Milestones (chart generated from AEBD-CC phase data)

6. COST

A. Prior year funding listed by project
B. Current Year Funding Requirements listed by project and phase
C. Future Requirements (requirements spreadsheet)
Detailed spreadsheet listed by site id, site name, phase, cost by FY, and description of requirements

7. COMMUNITY INVOLVEMENT (only include this section if there is public involvement)

Describe Community Involvement and Concerns

Sample CC CTC Spreadsheet

SITE NAME	SITE DESCRIPTION	PHASE	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015+	PHASE TOTAL	SITE TOTAL	DESCRIPTION OF WORK
CSWPY-CC-01	Lonely Landfill	LTM	16	16	16	25	16	16	16	16	16	25	331	509	509	4 wells sampled biannually for full suite, cap maintenance every 5 years (2033)
CSWPYCC-02	20,000 gallon UST	CMI(O)	30	30	30	30	30							150		Operation of the groundwater treatment plant and sampling 10 wells for POLs twice a year
		LTM						15	15	15	15	15	135	210	360	Sampling 10 wells for POLs twice a year (15K), closeout report in 2019 (10K), abandonment of 10 wells (50K)
FY TOTALS IN THOUSANDS OF $			**46**	**46**	**46**	**55**	**46**	**31**	**31**	**31**	**31**	**40**	**466**	**869**	**869**	

Notes:
All dollars in thousands
Phase – LTM - Long Term Management
CMI(O) – Corrective Measures Implementation-Operations