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ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT  
600 ARMY PENTAGON  
WASHINGTON DC 20310-0600

DAIM-ZA

28 JAN 2005

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Army Environmental Cleanup Strategic Plan

1. References:

- a. *Army Environmental Cleanup Strategy*, April 2003.
- b. Memorandum, DAIM-ZA, 29 May 2003, Army Environmental Cleanup Strategy.

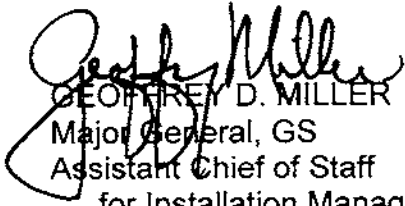
2. Reference 1.a. states that the Army will develop an environmental cleanup strategic plan to implement the Army's environmental cleanup strategy. Reference 1.b. transmitted the *Army Environmental Cleanup Strategy* and the original Army Environmental Cleanup Strategic Plan. This memorandum supersedes reference 1.b.

3. Enclosure 1 is the revised Army Environmental Cleanup Strategic Plan for fiscal years 2006 and 2007. In order to meet the objectives and targets outlined in the Strategic Plan, request each program manager develop a program management plan (PMP) for the cleanup program area(s) outlined in reference 1.a. Enclosure 2 provides guidance on the information and level of detail to include in PMPs to achieve each objective and target in the strategic plan. Coordinate draft PMPs with the Office of the Director of Environmental Programs during August, and submit a final PMP by 15 September 2005, and annually thereafter.

4. DASA(I&E)/ESOH and OACSIM will conduct an environmental cleanup management review in October and April each year.

5. The ODEP POC for the Army Environmental Cleanup Strategic Plan is Mr. Krishna Ganta, (703) 601-1599, e-mail [Krishna.ganta@hqda.army.mil](mailto:Krishna.ganta@hqda.army.mil).

2 Encls

  
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**ARMY**

**ENVIRONMENTAL**

**CLEANUP**

**STRATEGIC**

**PLAN**

January 2005

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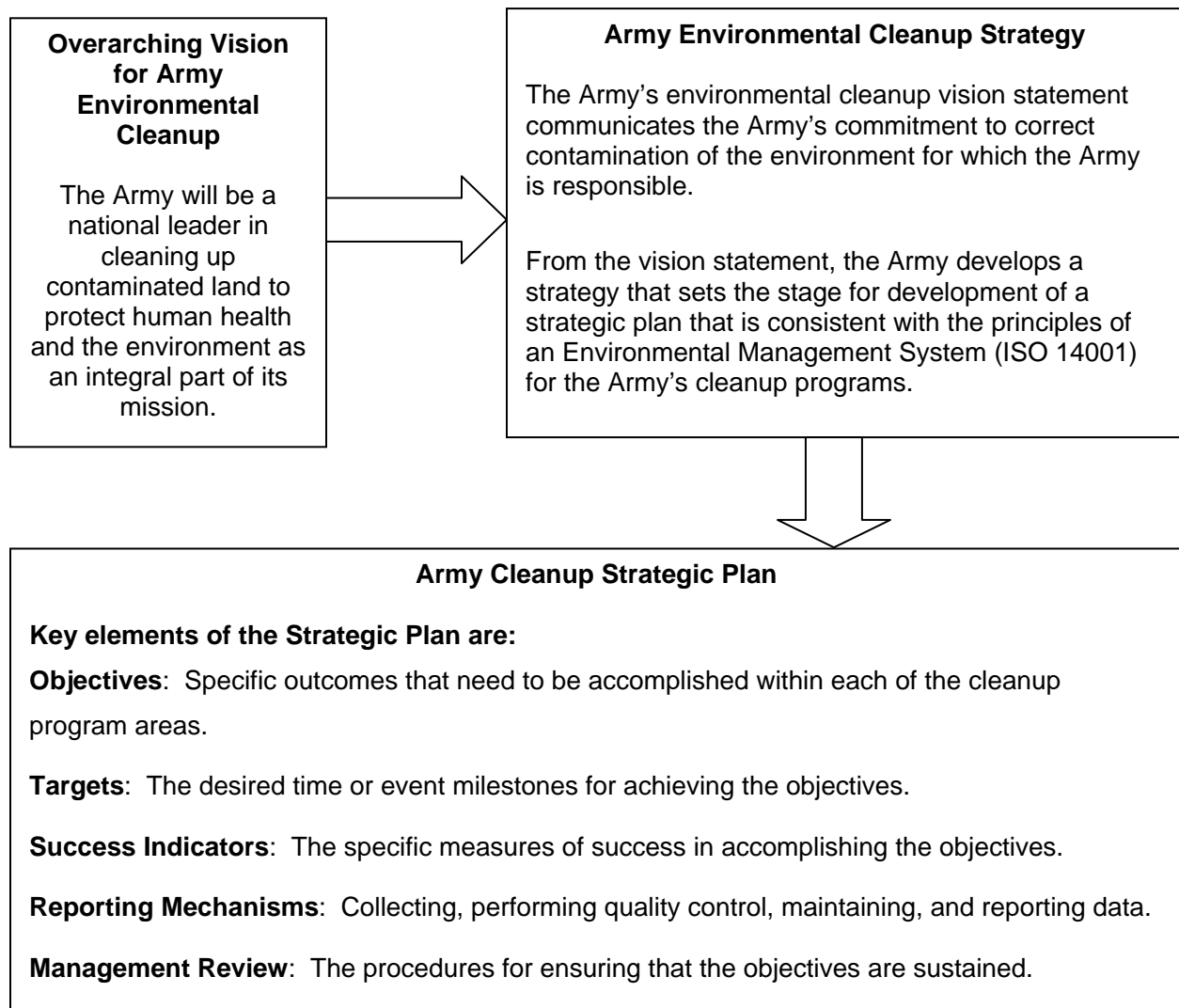
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# Foreword

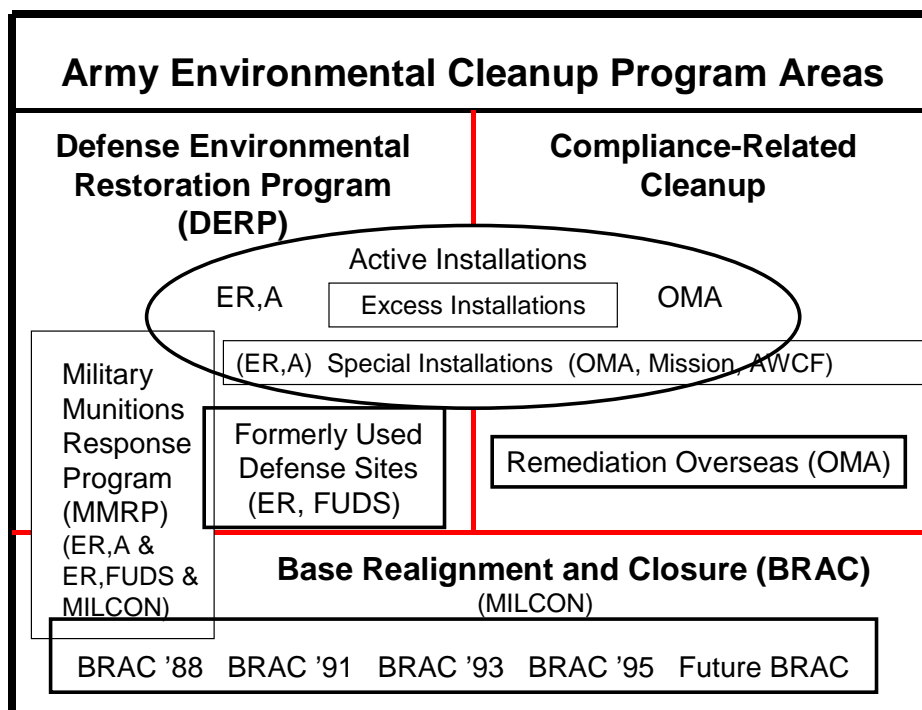
This document identifies a framework for implementing the Army Environmental Cleanup Strategy (AECS) during fiscal years 2006-2007, consistent with the most recent Program Objective Memorandum (POM). The AECS identifies overarching objectives to create consistency and accountability across the Army's cleanup program. This Strategic Plan updates the document first published in May 2003 and identifies specific objectives, targets, success indicators, reporting mechanisms, and management review processes for each of the cleanup program areas identified in the AECS. Specific guidance and procedures for managing the cleanup program in accordance with this Strategic Plan will be developed within each of the cleanup program areas and published by their managing entity in a program management plan, in coordination with the Assistant Chief of Staff for Installation Management's (ACSIM) Director of Environmental Programs.



# ARMY CLEANUP STRATEGIC PLAN

The cleanup program areas addressed in this strategic plan include cleanup efforts that have been conducted separately under the defense environmental restoration program (DERP), the base realignment and closure (BRAC) and compliance programs. Figure 1 depicts the differences and commonalities between the cleanup program areas.

**Figure 1: Army Environmental Cleanup Program**



In its September 2001 DERP Guidance, the Department of Defense (DoD) formally established an eligibility date of 17 October 1986 for sites in the restoration category of the DERP. Statutory constraints on funding and authority created an organizational divide between cleanup associated with past activities (i.e., restoration) and cleanup of contamination that occurred since that eligibility date (i.e., compliance). As a result, inconsistent and in some cases, duplicated management processes and resources impaired efficiency of these otherwise similar cleanup programs. In April 2003, the Assistant Secretary of the Army (Installations and Environment) issued the AECS and directed the Army staff to manage cleanup programs under a unified vision and overarching strategy. In addition, the Army determined that management of cleanup efforts at installations funded with working capital funds and at overseas facilities would similarly gain efficiency and accountability by inclusion under the AECS.

To that end, the Army developed a cleanup vision, overarching objectives, and a unified strategy for environmental cleanup.

Programming and Budgeting

Identification of requirements and execution of Army environmental cleanup must continue to be managed according to the discrete funding mechanisms associated with each cleanup program area. Accordingly, program managers (PM) are responsible for participating in programming and budgeting for their respective portions of the Army Environmental Cleanup Program. The US Army Environmental Center (USAEC) is the PM responsible for the active, excess, and Army National Guard (ARNG) installation restoration program (IRP), which is funded through the Environmental Restoration, Army (ER,A) account. The BRAC Division of the ACSIM office is the PM responsible for BRAC installations cleanup and for non-ER,A eligible cleanup at Army Excess installations. The US Army Corps of Engineers (USACE) is the PM responsible for the execution of the Formerly Used Defense Sites (FUDS) program using funds from the Environmental Restoration, FUDS (ER, FUDS) account that are programmed and budgeted by the Office of the Secretary of Defense (OSD).

The Installation Management Agency (IMA) is the PM responsible for compliance-related cleanup using funds from the Operations and Maintenance, Army (OMA)

and Operations and Maintenance, Army Reserves (OMAR) accounts, to include funds expended overseas. The ARNG is the PM responsible for compliance-related cleanup at ARNG facilities using funds from the Operations and Maintenance, National Guard (OMNG) fund account. During requirements development, requirements pass from installations through the IMA or ARNG via the Army Environmental Database (AEDB) for compliance-related cleanup (CC), but validation of requirements occurs at the ACSIM level.

The Army Major Commands (MACOMs) that continue to oversee industrial or special mission installations are responsible for compliance-related cleanup at the installations under their command. Compliance-related cleanup projects at special installations are funded from various mission or Army Working Capital Fund (AWCF) appropriations, and are largely dependent on the mission activity that caused the contamination.

<b>Program Management Plan Preparation</b>	
<u>Cleanup Program Area</u>	<u>Preparer</u>
Active and Excess Installation Restoration.....	USAEC
BRAC Installations Cleanup and non-ERA Eligible Cleanup at Excess Installations .....	BRAC Division
Formerly Used Defense Sites.....	USACE
Compliance-related Cleanup at US (including Reserves) and Overseas Installations .....	IMA
Compliance-related Cleanup at ARNG Facilities.....	ARNG
Compliance-related Cleanup at Special Installations.....	Determined on Case-by-Case Basis

## **Cleanup Strategy Management**

The Army will implement the AECS in alignment with its mission priorities using the ISO 14001 process depicted in Figure 2. This process entails five steps that are described below; the inner portion of the figure depicts organizational roles (who/what/where/when/why/how) and frequency of updates to various parts of the AECS.

### *Environmental Strategy*

Headquarters elements of the Army Secretariat and Army Staff developed a comprehensive Strategy (the AECS) encompassing all cleanup program areas under a unified vision and overarching objectives. Strategy development occurs in consultation with the program managers for each cleanup program area. This Strategic Plan presents a framework for AECS implementation that incorporates the ISO 14001 principles of continual improvement.

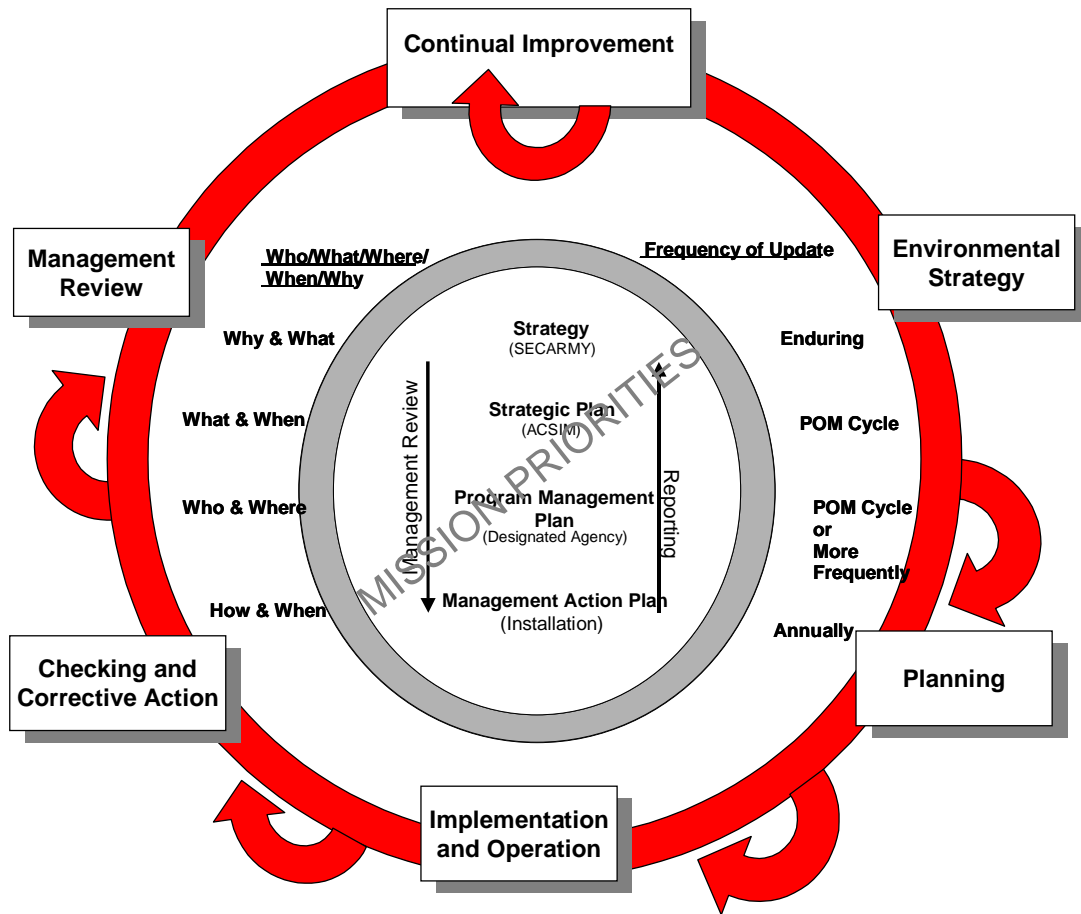
### *Planning*

Program managers for each cleanup program area establish guidance and procedures for implementing the Strategy and this Strategic Plan within their respective program area in consultation with the Headquarters Army Staff and relevant installations or USACE Districts. Guidance and procedures are published in a Program Management Plan (MAP) and include direction concerning MAP preparation for use by installations or USACE District project managers. Stakeholders may provide their input to Army project managers. Program managers also prepare input to the programming and budgeting process described earlier.

### *Implementation and Operation*

Installations or USACE Districts execute cleanup in accordance with guidance and procedures for their respective program area and consult and coordinate with federal and state regulators through the cleanup process. Public members of Restoration Advisory Boards (RABs) provide advice concerning the cleanup process. To improve accountability and personal responsibility, an individual is designated for each site to insure milestones are established and schedules are achieved. For many individuals, annual performance appraisals are directly related to achieving site schedules and ultimate site closure.

Figure 2: Cleanup Strategy Management Process



Checking and Corrective Action

Program managers check cleanup execution to achieve targets and make corrections as necessary. For example, if targets are not being met, program managers may recommend resource management changes in the planning, programming, or budgeting portions of the cleanup budget process.

Management Review

The Army Secretariat and Headquarters Army Staff review cleanup progress and consider improvements to the AECS and this Strategic Plan, as well as any necessary resource management changes required.



## Issues Impacting Army Cleanup

Several programmatic, technical, and/or legal issues present significant challenges to executing the Army environmental cleanup program in accordance with established objectives and targets. Some of the most significant issues facing the Army cleanup program are described below.

- The DOD formally created the Military Munitions Response Program (MMRP) category in September 2001 to address response actions to UXO, DMM or MC on other than operational ranges. This was a new program for active installations, while at BRAC and FUDS sites, actions to address ordnance and explosives had been ongoing for years. The Army's inventory of MMRP sites was completed in December 2003. A complete inventory of sites now allows the Army to program and budget to address all MMRP sites that pose a threat to human health, safety and/or the environment. In 2004, DOD established two MMRP goals: complete all preliminary assessments (PA) by the end of FY2007 and complete all site inspections (SI) by the end of FY2010. Execution of MMRP-category response actions at active installations over the next few years (FY06-10) will be a challenge for the Army. For DERP-eligible cleanup at active and excess installations, the Army plans to continue the Army Installation Restoration Program (IRP) and begin MMRP while maintaining an overall stable funding profile of about \$400 million annually, adjusted for inflation. The Army expects to meet the DOD goal for having a remedy in place or being response complete at IRP sites by 2014, and will continue to work with DOD to establish realistic goals for the MMRP.
- The selection and maintenance of land use controls (LUCs) remains a significant issue at cleanup sites around the country. Regulators and local developers increasingly want permanent remedies that impose no restrictions on use, especially on those properties involving military munitions. In some cases, it may not be technologically feasible to clean to unrestricted use. Additionally, it may not be legally required nor make sense in the overall context of cleanup. For example, the Army should not normally plan to clean to unrestricted use at a site where future use is for industrial purposes. In the cases where a LUC is used at active installations, the restrictions should be incorporated into installation master plans. Land use restrictions are also an important issue on FUDS that the Army no longer owns and for property being transferred from the Army. The Army must insure that LUCs will be maintained and enforced after property leaves Army control. All LUCs imposed in Army cleanup documents at property being transferred from the Army should also be outlined in appropriate transfer documents so the transferee(s) are aware of the restrictions that must be maintained. In certain cases, the Army may use deed restrictions to memorialize LUCs imposed at a transferring site.
- The potential reduction in the maximum contaminant level (MCL) for trichloroethylene (TCE) could have a dramatic effect on the Army's cleanup program when the TCE MCL is determined to be an applicable or relevant and appropriate requirement (ARAR) for a cleanup. Existing cleanup systems addressing TCE contamination have typically been designed to reach current MCLs. Potential changes

in the cancer slope factor for TCE may prompt EPA to propose a more stringent MCL or require more detailed evaluations for TCE vapors migrating into occupied buildings. For the vapor intrusion pathway, revised risk estimates will be over an order of magnitude more conservative than at the present time. Although ARARs are typically “frozen at the time of ROD signature,” a new or modified requirement may call into question the protectiveness of the selected remedy. Thus during the five-year review for existing sites, site risks may need to be evaluated if the MCL is reduced. Because TCE was a solvent in widespread use within DOD and private industry, a reduction in the MCL may have a dramatic effect on the Army’s cleanup program.

- Significant regulatory and public pressure continues to build for addressing sites potentially contaminated with perchlorate and other unregulated emergent chemicals. Widespread use of perchlorate in pyrotechnic training devices and rocket motors has caused potential contamination at a number of installations and FUDS, with as yet unknown costs for cleanup. The EPA has not established an MCL for perchlorate, although some states have begun the process. The National Academies of Science (NAS) convened an expert panel to address scientific questions about perchlorate, but did not address policy issues involved in setting MCLs. Meanwhile, the Army has issued policy that addresses sampling and analysis where a perchlorate release is suspected and where a complete human exposure pathway is likely to exist.

## **Applicability**

This Strategic Plan does not apply to cleanup efforts by the USACE for the Army Civil Works program (dams, locks, etc.), the Formerly Utilized Sites Remedial Action Program, or for other federal agencies. Furthermore, for some sites and properties, the DOD is one of two or more contributors to site contamination, and is thus considered a potentially responsible party (PRP). However, the Army’s strategic objectives and targets for cleaning up PRP sites are beyond the scope of this Strategic Plan, as are cleanup efforts associated with Army wartime operations and non-federally owned National Guard facilities that are not supported with federal funds.

## Army Active Installation Restoration

### Background

The active installation restoration program was established for responses to address contamination at active installations funded by the Environmental Restoration, Army (ER,A) account. The program addresses contamination caused by past practices (including sites that exceeded the 17 October 1986 eligibility date where the Army initiated response activities under DERP before the eligibility date was established in the September 2001 DERP Management Guidance) but it does not address contamination caused by current or ongoing installation operations.

### Program Drivers

There are several statutes and regulations affecting the active installation restoration program. Most notable are DERP (10 USC §§2701-10), CERCLA, RCRA, Executive Orders 12580 and 13016, DODD 4715.7, DERP Management Guidance, AR 200-1, and the Army Environmental Cleanup Strategy.

### Investment and Progress

From the beginning of the program in the late 1980's through fiscal year 2004, the Army addressed 9,685 potentially contaminated sites at 1,069 active installations. Of those sites, 8,804 require no further action, either due to site characterization that revealed no threat to human health and the environment (no contamination, or no pathways and receptors), or due to cleanup actions that put a remedy in place (RIP) or that achieved response complete (RC). The Army has spent almost \$3.3 billion in the program through fiscal year 2004, and anticipates spending an additional \$0.87 billion to attain RIP/RC at hazardous waste sites by year 2012. The total cost to complete\* the installation restoration portion of the program, including remedial action operations and long-term management, is projected to be \$1.8 billion.

The Army completed an inventory of MMRP sites at closed ranges on active installations in December 2003. The current estimated cost to attain RIP/RC at MMRP sites is \$5.2 billion, with a total cost to complete\* of \$5.5 billion, including long-term management. The Army will gather site inspection information prior to the DOD goal of 2010 and complete DOD munitions site prioritization protocol, enabling a more refined estimate of the "cost-to-complete" for the MMRP.

The current Program Objective Memorandum includes requirements for approximately \$400 million per year through the POM years, adjusted for inflation, which is consistent with recent levels of investment. The Army plans to sustain a level of investment beyond the POM years with the intent to meet the DOD goal of having all hazardous waste sites at active installations at RIP/RC by 2014.

\* The cost to complete is consistent with the DERP Annual Report to Congress and does not include program management costs.

## Mission Statement for the Army Active Installations Restoration

The mission for Army active installations restoration is to perform appropriate, cost effective cleanup to provide property that is safe for installation use, and to protect human health and the environment.

## Objectives, Targets, and Success Indicators for Army Active Installations Restoration:

Objectives, targets and success indicators are formatted as follows:

1. Objective.
  - 1.1. Target(s) for this objective.
    - 1.1.1. Success indicator(s) for this target.

1. Ensure prompt action to address imminent and substantial threats to human health, safety, and the environment.
  - 1.1. Protect workers, the public, and the environment as hazards are identified.
    - 1.1.1. Appropriate notification(s) made to command, regulators and public in accordance with established plans.
2. Conduct appropriate, cost-effective efforts to identify, evaluate, and, where necessary to protect public safety or human health and the environment, conduct response actions to address contamination resulting from past DOD activities. Maintain relevant cleanup information in a permanent document repository.
  - 2.1. Meet the 2014 Defense goal to achieve remedy in place (RIP) or response complete (RC) at all Installation Restoration Program (IRP) category sites.
    - 2.1.1. 95% all IRP Category high relative risk sites at RIP/RC by 2007.
    - 2.1.2. 100% all IRP Category high and medium relative risk sites at RIP/RC by 2011.
    - 2.1.3. 100% all IRP Category sites at RIP/RC by 2012.
  - 2.2. Meet annual planned activities as projected in the Army Environmental Database for Restoration (AEDB-R).
    - 2.2.1. 90% of actual versus planned annual activities are met, and plan to achieve RIP/RC at all sites by the 2014 Defense goal (GREEN)
    - 2.2.2. 80% - 89% of actual versus planned annual activities are met, and plan to achieve RIP/RC at all sites by the 2014 Defense goal (YELLOW)
    - 2.2.3. Less than 80% of actual versus planned annual activities are met, or project that 1 or more sites will miss RIP/RC by the 2014 Defense goal (RED)
  - 2.3. Achieve 10,123 out of 10,432 total restoration sites RIP/RC by end of FY07.
    - 2.3.1. 9,840 restoration sites at RIP/RC in FY06.
    - 2.3.2. 10,123 restoration sites at RIP/RC in FY07.
    - 2.3.3. 10,432 restoration sites at RIP/RC by end of FY12.
  - 2.4. Attain installation RIP/RC for following number of installations.
    - 2.4.1. 32 by end of FY06 (32% of current 101).

- 2.4.2. 76 by end of FY09 (75% of current 101).
- 2.4.3. 101 by end of FY12 (100% of current 101).
- 2.5. Complete all MMRP Site Inspections (SI) by the end of FY10.
  - 2.5.1. SI complete at 15% of installations by end of FY06 (24/162).
  - 2.5.2. SI complete at 25% of installations by end of FY07 (40/162).
  - 2.5.3. SI complete at 75% of installations by end of FY09 (121/162).
  - 2.5.4. SI complete at 100% of installations by end of FY10 (162/162).
- 2.6. Develop MMRP funding strategy to meet program goals.
  - 2.6.1. At least one hazard evaluation module of the Munitions Response Prioritization Protocol applied to all MMRP sites by end of FY10.
  - 2.6.2. All hazard evaluation modules of the Munitions Response Prioritization Protocol applied to all MMRP sites by the end of FY12
  - 2.6.3. Response actions funded to address imminent public safety threats identified during the SI phase without affecting the Army's goal of completing all SIs by the end of FY10.
  - 2.6.4. Funding needs balanced to support land transfer goals at excess property installations with competing MMRP requirements.
  - 2.6.5. Inventory of non-DoD owned Army National Guard MMRP sites exists and is reconciled with the Army National Guard
- 2.7. Populate and maintain a permanent document repository for cleanup information, regardless of funding source, so that cleanup information can be retrieved at any date in the future.
  - 2.7.1. Comprehensive, up to date, permanent document repository that reflects all environmental cleanup at an active installation; the 40% of installations that will have documentation complete at end of FY06 are identified; the 70% of installations that will have documentation complete at end of FY07 are identified; 100% of installations have documentation complete at end of FY08; new documents at all installations submitted within 60 days of receipt.
- 2.8. Establish by FY06 a strategy to develop and maintain a centralized database to track and manage land use controls created as part of a restoration program response action.
  - 2.8.1. Existing systems evaluated by end of 1<sup>st</sup> quarter FY06.
- 2.9. For each site, obtain geospatial coordinates at a scale commensurate with the scope of the project and send to the US Army Installation Geospatial Information and Services Program office. Follow the guidance in DAIM-MD (AR 210-20) Memorandum dated 16 October 2001, Subject: Data Standards for Computer Aided Drafting and Design (CADD), Geographic Information System (GIS) and Related Technologies.

- 2.9.1. Environmental cleanup liability information is identified and available for linking with installation real property inventory.
  - 2.10. For each site, ensure that management procedures for accountability are identified and in place for forecasting and attaining milestones toward reaching RIP/RC.
    - 2.10.1. Program managers have procedures in place including periodic reviews with supervisory and quality control reviewers to identify and resolve issues that may impede progress.
    - 2.10.2. Supervisory reviewers are being held accountable for the success of their subordinates in actively identifying and effectively resolving issues that could hinder reaching RIP/RC targets.
    - 2.10.3. An organization and an individual to be held accountable (via performance appraisals or other means) are identified for each site.
3. Comply with statutes, regulations, Executive Orders, and other external requirements governing cleanup.
  - 3.1. Anticipate and promptly achieve compliance with new or revised enforceable requirements.
    - 3.1.1. No fines or penalties.
  - 3.2. Use the installation's mission-focused ISO 14001 EMS to continually upgrade performance of the active installation cleanup program.
    - 3.2.1. Cleanup considerations are included in installation EMS implementation plans at installations with cleanup activities.
  - 3.3. Complete five-year reviews as required.
    - 3.3.1. Five-year review 100% complete in year required.
  - 3.4. Identify potential program impacts, including funding requirements and delays to meeting established goals, when chemicals of emerging concern are indicated, such as perchlorate, for inclusion in the Army PPBES process.
    - 3.4.1. DAIM(EDC) notified within three months of identifying potential impacts.
4. Ensure that Army regulations, policies, and guidance are developed within the framework of the Army Environmental Cleanup Strategy.
  - 4.1. Recommend changes as required to Army Regulation 200-1.
  - 4.2. Update the Army DERP Active Installations Environmental Restoration Program Management Guidance within 180 days of changes to the DOD DERP Management Guidance.
  - 4.3. Develop specific performance metrics and describe the program management approach for accomplishing installation restoration cleanup by developing an annual Program Management Plan (PMP).
    - 4.3.1. Specific metrics established with annual submission of the PMP.

- 4.3.2. PMP delivered to DAIM(ED) NLT 15 September each year.
5. Plan, program, budget, and execute cleanup in accordance with DOD and Army directives and guidance using validated, auditable, and documented site-level data.
  - 5.1. Achieve Federal Financial Management Improvement Act (FFMIA) compliance by FY10.
    - 5.1.1. Qualified audit opinion received by end of FY07.
    - 5.1.2. Unqualified audit opinion received by end of FY10.
    - 5.1.3. Financial management information collected and maintained in an FFMIA-compliant single database of record.
  - 5.2. Execute the annual DERP ER,A appropriation for the active installation restoration program to meet DOD obligation and expense objectives.
    - 5.2.1. Obligation targets by quarter are 28%, 55%, 80%, and 100%, as recorded in DFAS.
    - 5.2.2. Expense targets over 5 years are 22%, 67%, 89%, 95%, and 100%, as recorded in DFAS.
  - 5.3. Develop a strategy to measure the NPL deletion program by the 1<sup>st</sup> quarter of FY06. Strategy should measure the Army's submission of the site close out reports necessary to start the regulatory delisting process of NPL sites.
  - 5.4. Include a cleanup program exit strategy in all IAPs by 1<sup>st</sup> quarter FY 2006.
    - 5.4.1. IAP workshops augmented to develop path forward/exit strategies for all IRP category sites with work underway and incorporate into the FY2006 IAPs.
  - 5.5. Continue, as required, to implement standardized processes and procedures for introducing rigor, responsibility and accountability in management of cleanup programs.
    - 5.5.1. RACER estimates are used for developing cost estimates where more accurate engineering cost estimates from an RI/FS may not exist.
    - 5.5.2. Documentation supporting the cost estimate is retained for future audit.
    - 5.5.3. Responsibility and accountability are addressed in the program management plan.
6. Develop cleanup partnerships with appropriate federal, Tribal, state, local, territorial, or host-nation authorities.
  - 6.1. Review state participation in installation activities under DSMOA annually.
    - 6.1.1. States and installations coordinate with each other according to the six-step cooperative agreement process.
  - 6.2. Involve regulatory stakeholders in annual IAP development/revision process.
    - 6.2.1. Regulatory stakeholders participate in IAP development.

- 6.3. Participate in EPA/state partnering sessions, typically sponsored by the DOD regional environmental offices in each EPA region.
  - 6.3.1. Program managers and installation supervisory reviewers are aware of EPA/State environmental initiatives, resulting in a lack of cleanup related enforcement actions and fines.
- 6.4. Ensure installations are fulfilling their lead agent responsibilities under CERCLA §106 for notification and coordination of studies and response actions with Natural Resource Trustees.
  - 6.4.1. NRI guidance issued by 1<sup>st</sup> quarter FY06.
7. Promote and support public stakeholder participation in the cleanup process, as appropriate, and make site-level cleanup information available to the public.
  - 7.1. Survey community for interest in establishing a RAB every 2 years.
    - 7.1.1. Interest determined as scheduled.
  - 7.2. Involve public stakeholders in annual IAP development/revision.
    - 7.2.1. Public stakeholders participate in IAP development.
  - 7.3. As required by CERCLA, the NCP, and the DERP Management Guidance, maintain an information repository so that CERCLA cleanup information is available to the public.
    - 7.3.1. An administrative record at a single location on the installation and an information repository (i.e., administrative record file plus any other background information) available to the public at a location at or near the installation.
8. Support the development and use of cost-effective cleanup approaches and technologies to improve program efficiency.
  - 8.1. Implement innovative business strategies, commercial practices and incentives to improve overall project performance and completion. Implement performance-based contracts for 70% of the IRP budget by end of FY07.
    - 8.1.1. 60% by end of FY06.
    - 8.1.2. 70% by end of FY07.
  - 8.2. Streamline program management to maximize the amount of funding going to actual remediation at the restoration sites.
    - 8.2.1. Program management costs (including ATSDR and DSMOA costs) are less than 10.5% of total ER,A program in FY06 (Based on a \$400M annual program).
    - 8.2.2. Program management costs (including ATSDR and DSMOA costs) are less than 10% of total ER,A program in (Based on a \$400M annual program).
  - 8.3. Achieve a return on investment of \$3 cost savings/avoidance for \$1 investment for special studies/investment strategies by end of FY06. Track GWETER, IAP



- workshops, PBC, technical assistance, NAS studies, and report progress during semiannual reviews.
- 8.3.1. Cumulative costs and savings/avoidance from technical assistance efforts are tracked and reported semi-annually.
  - 8.3.2. Remedial Action Operations (RA(O)) and Long-Term Management (LTM) are optimized through application of technical assistance and contracting initiatives.
- 8.4. Lead an initiative with BRAC and FUDS participation to consider consolidating post remedy-in-place activities on a regional basis, to include exit strategies and incentives for early termination.
- 8.4.1. All projects with LTM activity in FY2006 considered in the consolidation initiative.
  - 8.4.2. 20% of the RA(O)/LTM program budget in FY2006 obligated in the consolidation initiative.
  - 8.4.3. 40% of the RA(O)/LTM program budget in FY2007 obligated in the consolidation initiative.
- 8.5. Identify innovative and/or more efficient or effective technologies, evaluate for program/project applicability, and implement as appropriate.
- 8.5.1. 50% of ongoing remedial action projects evaluated for application of innovative and/or more efficient technologies or program efficiencies by the end of FY06.
  - 8.5.2. 60% of ongoing remedial action projects evaluated for application of innovative and/or more efficient technologies or program efficiencies by the end of FY07.
  - 8.5.3. Discussion of use of innovative technologies is a part of each Management Review.
9. Perform semi-annual program management reviews of cleanup progress against established targets, and periodic reviews of sites where contamination remains in place.
- 9.1. Develop the schedule for the mid-year and year-end reviews NLT 31 December of each year.
    - 9.1.1. Meetings occur IAW the established schedule.
  - 9.2. Ensure the appropriate program managers present success indicators identified in the strategic plan as part of the semi-annual review.
    - 9.2.1. Timelines and responsible respondents are tasked as part of the review for identified deficiencies. Required follow-ups are incorporated into the next scheduled review.

## **Reporting Mechanisms**

The Army Environmental Database for Restoration (AEDB-R) is the database of record for the Army Active Installation Restoration Program. The AEDB-R contains site level detail by phase of cleanup (studies, design and construction, long-term management) for contaminated sites being addressed by the Army. In addition, the database contains cost, relative risk, and other information for each site. The AEDB-R is managed by USAEC, is updated semi-annually by the installations, and is used for upward reporting to the Knowledge-Based Corporate Reporting System and the Restoration Management Information System used by OSD to support development of the DERP Annual Report to Congress. AEDB-R is also used by the Army to support cleanup program planning, implementation, and semiannual management reviews.

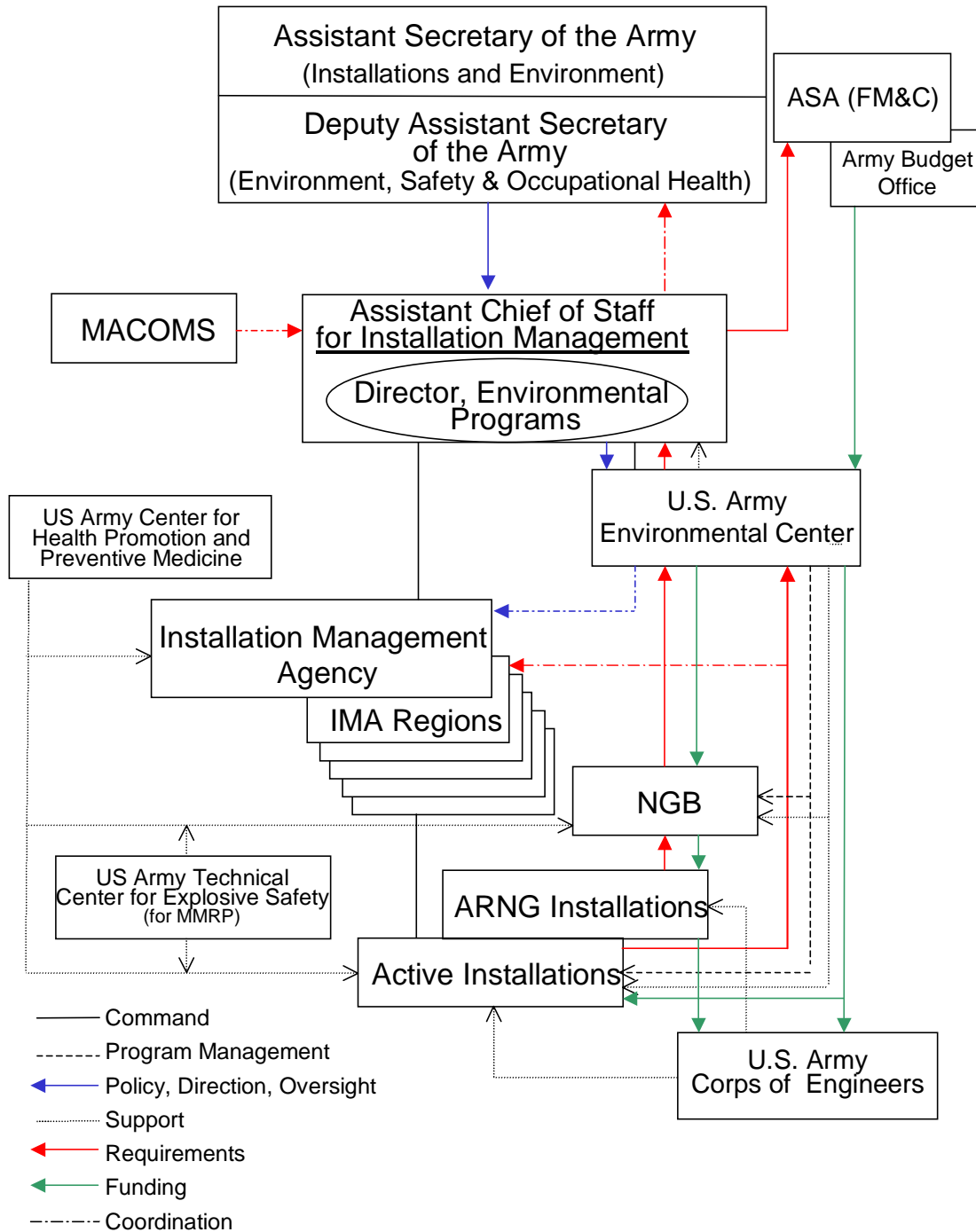
## **Management Review**

OSD has established semi-annual ESOH management reviews where the Army is required to provide information as of the end of the fiscal year and in mid-year to report progress in meeting objectives and targets. The Principal Deputy Under Secretary of Defense for Installations and Environment is typically the senior reviewer.

As the Army prepares to brief OSD, the Deputy Assistant Secretary of the Army for Environment, Safety, and Occupational Health is the senior Army reviewer. Program specific issues that OSD requires are included, as well as Army-specific objectives and targets addressed in the Army environmental cleanup strategic plan. Program managers and the ODEP staff participate in the management review. The USAEC also participates to provide quality assurance and help resolve any discrepancies as appropriate. Outcomes from the management review are considered and necessary adjustments are made for continual improvement of the environmental cleanup strategy and this strategic plan.

Program Build and Execution Chart

# Army Active Installations DERP



## Army BRAC Cleanup

### Background

The Army established the Base Realignment and Closure (BRAC) program to meet the requirements of the Base Closure and Realignment Act of 1988 and the Defense Base Closure and Realignment Act of 1990, as amended. The Army conducts environmental cleanup using Military Construction (BRAC) funds to ensure that BRAC property transferred out of Army control is suitable for future use.

### Program Drivers

Several statutes and regulations govern real property disposal, but for the BRAC cleanup program, the program drivers are essentially the same as for the other Army cleanup programs.

Congress authorized an additional BRAC round in FY2005. Once the President identifies the selected installations, the Army will transfer authority to address cleanup at those installations from the existing cleanup program area to the BRAC program area, unless these installations realign to the Army National Guard or Reserves and remain active federal installations.

### Investment and Progress

Through FY2004, the Army BRAC program transferred to other landowners a total of 227,421 acres. From FY1990 thru FY2004, the BRAC program expended \$2.4 billion BRAC cleanup. Of the BRAC acreage remaining for transfer (31,186 acres), a substantial portion awaits completion of environmental investigation and cleanup. The current cost estimate for completing all remaining BRAC cleanup from rounds 88, 91, 93, and 95 (also known as legacy BRAC versus new 2005 BRAC) is \$1.0 billion\*.

\* The cost to complete is consistent with the DERP Annual Report to Congress and does not include program management costs.

## Mission Statement for BRAC Cleanup

The mission for BRAC cleanup is to perform appropriate, cost-effective cleanup to provide property that is suitable for transfer and anticipated reuse, and protective of human health and the environment.

### BRAC Installations

Alabama AAP	Seneca Army Depot Activity	Philadelphia DPSC
Camp Evans	Stratford AEP	Ogden DDD
Fort Pickett	Army Materials Tech Lab	Camp Bonneville
Fort Richie	Vint Hill Harms Station	Fitzsimons Army Med Ctr
Fort Wingate Depot Activity	Tooele Army Depot	Oakland
Hamilton/Bellmore/Tooten	Letterkenny AD	Fort Chaffee
Jefferson Proving Ground	Pueblo AD	Fort McClellan
Lexington Facility	Red River AD (includes Denton)	Fort Ord
Sacramento Army Depot	Sierra AD	Ft Benjamin Harrison
Savanna Army Depot Activity	Umatilla AD	Memphis DDD

## Objectives, Targets, and Success Indicators of BRAC Cleanup:

Objectives, targets and success indicators are formatted as follows:

1. Objective.
  - 1.1. Target(s) for this objective.
    - 1.1.1. Success indicator(s) for this target.

1. Ensure prompt action to address imminent and substantial threats to human health, safety, and the environment.
  - 1.1. Protect workers, the public, and the environment as hazards are identified.
    - 1.1.1. Appropriate notification(s) made to command, regulators and public in accordance with established plans.
    - 1.1.2. Where applicable, practice pollution prevention to ensure current operations and cleanups at BRAC installations create no new threats to human health and the environment.
2. Conduct appropriate, cost-effective efforts to identify, evaluate, and, where necessary to protect public safety or human health and the environment, conduct response actions to address contamination resulting from past DOD activities. Maintain relevant cleanup information in a permanent document repository.

Note: The Department of Defense Financial Management Regulation establishes goals for the BRAC Installation Restoration Program and the BRAC Military Munitions Response Program as follows: for BRAC IRP, 100% of installations RIP/RC by the end of FY05; for BRAC MMRP, 100% of sites RIP/RC by the end of FY09. DOD goals cannot be met with funding in the current POM. The targets and success indicators below represent "stretch" goals, given current funding and availability of commercial resources.

- 2.1. Facilitate BRAC property transfer and reuse by maintaining an inventory of contaminated sites and completing required environmental investigation in FY06.
  - 2.1.1. 100% of CERFA parcels in environmental category 1-6 by end of FY06.
- 2.2. Meet annual planned activities as projected in the Army Environmental Database for Restoration (AEDB-R).
  - 2.2.1. 90% or greater of planned annual activities met (GREEN).
  - 2.2.2. 80% to 89% of planned annual activities met (YELLOW).
  - 2.2.3. Less than 80% of planned annual activities met (RED).

- 2.3. Establish a target for the number of acres to transfer in FY06 during mid-year review in FY05. Ensure that acres projected for transfer in FY06 are environmentally suitable for transfer.
  - 2.3.1. 90% of target acres transferred (GREEN).
  - 2.3.2. 80% to 89% of target acres transferred (YELLOW).
  - 2.3.3. Less than 80% of target acres transferred (RED).
- 2.4. Establish a target for number of acres to transfer in FY07 during mid-year review in FY06.
- 2.5. Populate and maintain a permanent document repository for cleanup information, regardless of funding source, so that cleanup information can be retrieved at any date in the future.
  - 2.5.1. Comprehensive permanent document repository that reflects all environmental cleanup at an active installation that is up to date; the 40% of installations that will have documentation complete at end of FY06 are identified; the 70% of installations that will have documentation complete at end of FY07 are identified; 100% of installations have documentation complete at end of FY08; new documents at all installations submitted within 60 days of receipt.
- 2.6. Achieve restoration RIP/RC for ten (10) installations by the end of FY07.
  - 2.6.1. Six (6) installations at restoration RIP/RC at end of 1<sup>st</sup> quarter, FY06 (Alabama AAP, Bennett ARNG Training Area, Blue Grass Army Depot – Lexington Facility, Fort Ritchie, Hamilton Army Air Field, and Vint Hill Farms Station).
  - 2.6.2. Four (4) installations at RIP/RC by end of FY07 (Army Research Laboratory – Watertown, Jefferson Proving Grounds, Oakland Army Base, Tooele Army Depot).
  - 2.6.3. All but four (4) installations RIP/RC by end of FY11 (Pueblo Army Depot, Stratford Army Engine Plant, Fort Ord, Fort McClellan).
- 2.7. Achieve 1845 out of 1898 total restoration sites RIP/RC by end of FY07.
  - 2.7.1. 1830 restoration sites at RIP/RC in FY06.
  - 2.7.2. 1845 restoration sites at RIP/RC in FY07.
  - 2.7.3. 1898 restoration sites at RIP/RC by end of FY11.
- 2.8. Complete all MMRP Site Inspections by the end of FY10.
  - 2.8.1. Site Inspections complete at 50% of all installations by the end of FY06.
  - 2.8.2. Site Inspections complete at 60% of all installations by the end of FY07.
- 2.9. Achieve MMRP RIP/RC for one installation by end of FY07.

- 2.9.1. One (1) Installation at MMRP RIP/RC by beginning of FY06 (Fort Ritchie).
- 2.9.2. Two installations RIP/RC by end of FY11 (Fort Ritchie and Jefferson Proving Grounds).
- 2.10. Work with USAEC to establish by end of FY06 and maintain a database, in conjunction with the Active Installation Restoration program, to track and manage land use controls created as part of a restoration program response action.
  - 2.10.1. Database is established and contains at least one existing ROD/DD with Land Use Controls (LUCs) by end of FY07.
  - 2.10.2. Future ROD/DDs with LUCs added within six (6) months of ROD/DD signature.
- 2.11. For each site, ensure that management procedures for accountability are identified and in place for forecasting and attaining milestones toward reaching RIP/RC.
  - 2.11.1. Program managers have procedures in place including periodic reviews with the installation supervisor and remedial project manager to identify and resolve issues that may impede progress.
  - 2.11.2. Supervisors are being held accountable for the success of their subordinates in actively identifying and effectively resolving issues that could hinder reaching RIP/RC targets.
  - 2.11.3. An organization and an individual to be held accountable (via performance appraisals or other means) are identified for each site.
- 3. Comply with statutes, regulations, Executive Orders, and other external requirements governing cleanup.
  - 3.1. Anticipate and promptly achieve compliance with new or revised enforceable requirements.
    - 3.1.1. No adverse environmental enforcement actions received.
  - 3.2. Identify potential program impacts, including funding requirements and delays to meeting established goals, when chemicals of emerging concern are indicated, such as perchlorate, for inclusion in the Army PPBES process.
    - 3.2.1. DAIM(EDC) notified within three months of identifying potential impacts.
- 4. Ensure that Army regulations, policies, and guidance are developed within the framework of the Army Environmental Cleanup Strategy.
  - 4.1. Update the BRAC Defense Environmental Cleanup Program (DERP) Management Guidance within 180 days of changes to the DOD DERP Management Guidance.

- 4.2. Develop specific performance metrics and describe the program management approach for accomplishing cleanup by developing an annual Program Management Plan (PMP) with two distinct elements: one element for BRAC and a 2<sup>nd</sup> element for Excess Installations.
  - 4.2.1. Specific metrics established with annual submission of the PMP.
  - 4.2.2. PMP delivered to DAIM(ED) NLT 15 September each year.
5. Plan, program, budget, and execute cleanup in accordance with DOD and Army directives and guidance using validated, auditable, and documented site-level data.
  - 5.1. Execute BRAC appropriations to meet DOD obligation and expense objectives.
    - 5.1.1. Obligation targets by quarter are 28%, 55%, 80%, and 100%, as recorded in DFAS.
    - 5.1.2. Expense targets over 5 years are 22%, 67%, 89%, 95%, and 100%, as recorded in DFAS.
  - 5.2. Achieve Federal Financial Management Improvement Act (FFMIA) compliance by FY10.
    - 5.2.1. Qualified audit opinion by end of FY07.
    - 5.2.2. Unqualified audit opinion by end of FY10.
    - 5.2.3. Financial management information collected and maintained in an FFMIA-compliant single database of record.
  - 5.3. Include or update, as appropriate, a cleanup program long-term course of action (exit strategy) in property-specific BRAC Cleanup Plans (BCPs) annually.
    - 5.3.1. Each BCP includes an exit strategy for each property/ parcel in the plan.
  - 5.4. Continue, as required, to implement standardized processes and procedures for introducing rigor, responsibility and accountability in management of BRAC cleanups.
    - 5.4.1. RACER estimates are used for developing cost estimates where more accurate engineering cost estimates from an RI/FS may not exist.
    - 5.4.2. Documentation supporting the cost estimate is retained for future audit.
    - 5.4.3. Responsibility and accountability are addressed in the program management plan.
6. Develop cleanup partnerships with appropriate federal, tribal, state, local, territorial, or host-nation authorities.
  - 6.1. Update annually BRAC Cleanup Plan Abstracts, with EPA and State participation, to promote coordination, cooperation, and property transfer.



- 6.1.1. Traditional BCPs transitioned to BRAC Installation Action Plans (BIAPs) for Legacy BRAC installations not RIP/RC by the beginning of FY06.
- 6.1.2. BIAPs updated by end of FY06 and annually thereafter.
- 6.1.3. Each BIAP contains an exit strategy that is clearly communicated.
- 7. Promote and support public stakeholder participation in the cleanup process, as appropriate, and make site-level cleanup information available to the public. Maintain relevant cleanup information in a permanent document repository.
  - 7.1. Survey community for interest in establishing a RAB every 2 years, and when an installation with no RAB identifies MMRP sites.
    - 7.1.1. Interest determined every 2 years, as scheduled.
  - 7.2. Involve public stakeholders in annual BIAP development/revision.
    - 7.2.1. Public stakeholders involved in BIAP development.
  - 7.3. As required by CERCLA, the NCP, and the DERP Management Guidance, establish and/or maintain an information repository so that cleanup information is available to the public.
    - 7.3.1. An administrative record and information repository available at a single government location.
    - 7.3.2. For NPL installations, an administrative record and information repository at a single government location and a comprehensive information repository available to the public at a location off the installation.
    - 7.3.3. 50% of NPL installations complete by end of FY06.
    - 7.3.4. 100% of NPL installations complete by end of FY07.
    - 7.3.5. All Legacy BRAC installations complete by end of FY09.
- 8. Support the development and use of cost-effective cleanup approaches and technologies to improve program efficiency.
  - 8.1. Identify innovative and/or more efficient or effective technologies, evaluate for program/project applicability, and implement as appropriate.
    - 8.1.1. 50% of ongoing remedial action projects evaluated for application of innovative and/or more efficient technologies or program efficiencies by the end of FY06.
    - 8.1.2. 60% of ongoing remedial action projects evaluated for application of innovative and/or more efficient technologies or program efficiencies by the end of FY07.
    - 8.1.3. Discussion of use of innovative technologies is a part of each Management Review.

- 8.2. Implement innovative business strategies, commercial practices and incentives to improve overall project performance and completion.
  - 8.2.1. Performance based contracts (PBCs) or environmental services cooperative agreements (ESCAs) in place for 60% of remaining sites by end of FY06.
  - 8.2.2. Performance based contracts (PBCs) or environmental services cooperative agreements (ESCAs) in place for 70% of remaining sites by end of FY07.
- 8.3. Participate in the ongoing initiative with USAEC to consider consolidating post remedy-in-place activities on a regional basis, to include exit strategies and incentives for early termination.
  - 8.3.1. All projects with long-term management (LTM) activity in FY2006 considered in the consolidation initiative.
  - 8.3.2. 20% of the RA(O)/LTM program budget in FY2006 obligated in the consolidation initiative.
  - 8.3.3. 40% of the RA(O)/LTM program budget in FY2007 obligated in the consolidation initiative.
- 8.4. Streamline program management to maximize the amount of funding going to actual remediation at the restoration sites.
  - 8.4.1. Program management costs (including ATSDR and DSMOA costs) do not exceed 15% of total BRAC Cleanup program (Based on a \$90M annual program).
9. Perform semi-annual program management reviews of cleanup progress against established targets, and periodic reviews of sites where contamination remains in place.
  - 9.1. Establish responsibility prior to property transfer for conducting five-year reviews at NPL sites where contamination remains in place during long-term management.
  - 9.2. Develop the schedule for the mid-year and year-end reviews NLT 31 December of each year.
    - 9.2.1. Meetings occur IAW the established schedule.
  - 9.3. Ensure the appropriate program managers present success indicators identified in the strategic plan as part of the review.
    - 9.3.1. Timelines and responsible respondents are tasked as part of the review for identified deficiencies. Required follow-ups are incorporated into the next scheduled review.
10. Develop policy/ guidance and procedures that will be required to implement BRAC 2005.

- 10.1. Develop guidance documents IAW assigned action dates.
  - 10.1.1. Guidance documents completed IAW the assigned action dates.
- 10.2. Develop procedures for recruiting a BRAC Environmental Coordinator (BEC) and support staff for each BRAC installation.
  - 10.2.1. Qualified personnel hired to fill BEC and support staff positions at all BRAC 2005 installations by end of 2<sup>nd</sup> quarter FY06.
- 10.3. Develop BRAC Environmental Training Program for BRAC 2005 personnel by end of 1st quarter FY06.
- 10.4. Work with ASA (I&E) and the DOD Office of Economic Adjustment in the development of training material for communities.
- 10.5. Develop and coordinate efforts to implement Programmatic Environmental Reviews and enhanced Environmental Baseline Survey (EBS) actions for BRAC 2005 installations; enhanced EBS includes ASTM Phase I and Phase II activities as well as CERFA determination.
- 10.6. Develop enhanced EBS for each installation by end of FY07.
  - 10.6.1. 50% of installations complete by end of FY06.
  - 10.6.2. 100% of installations complete by end of FY07.
- 10.7. Complete National Environmental Policy Act analyses by end of FY07.
- 10.8. Identify parcels by CERFA category by end of FY07.
- 10.9. Complete characterization so that no parcels remain in CERFA Category VII by end of FY11.
- 10.10. Convert all cleanup projects to AEDB-R (BRAC) by end of 2<sup>nd</sup> quarter FY06 (during the spring 2006 data call).

## Reporting Mechanisms

The Army Environmental Database for Restoration (AEDB-R) is the database of record for the Army BRAC Cleanup program. The AEDB-R contains site level detail by phase of cleanup (studies, design and construction, long-term management) for contaminated sites being addressed by the Army. In addition, the database contains cost, relative risk, and other information for each site. The USAEC manages the AEDB-R; the installations update the data semi-annually, and they use it for upward reporting to the Knowledge-Based Corporate Reporting System and the Restoration Management Information System used by OSD to support development of the DERP Annual Report to Congress. The Army also uses AEDB-R to support cleanup program planning, implementation, and semiannual management reviews.

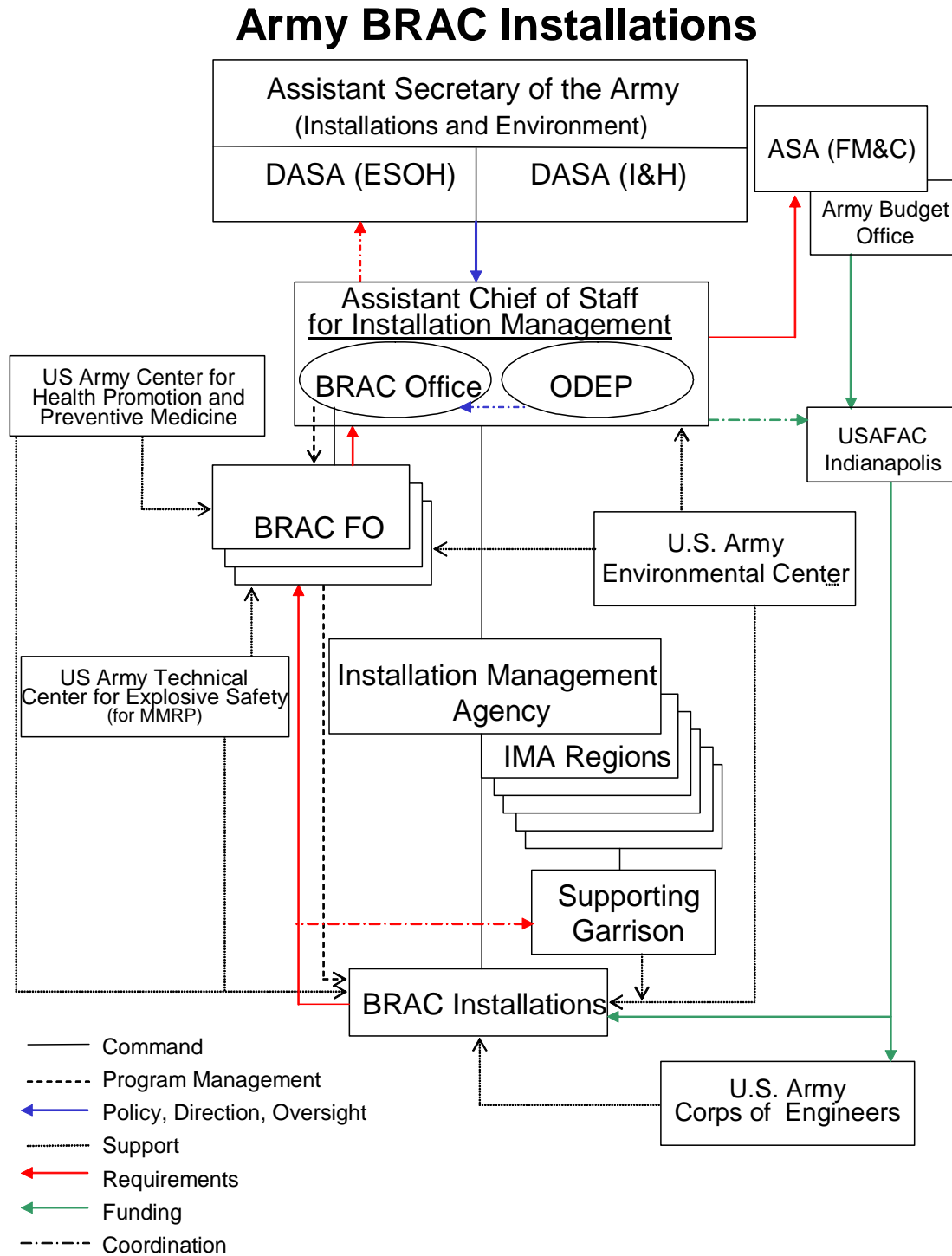
## Management Reviews

The Army reviews BRAC installation cleanup workplans on a quarterly basis and conducts in-progress reviews of selected installations and technical reviews of selected site cleanup projects. The Army BRAC Division Chief is the senior Army reviewer for these reviews.

At the DOD level, the BRAC cleanup program undergoes a semi-annual management review.

As the Army prepares to brief OSD, the Deputy Assistant Secretary of the Army for Environment, Safety, and Occupational Health is the senior Army reviewer. The reviews include program specific issues that OSD requires, BRAC-specific objectives, and targets addressed in the Army environmental cleanup strategic plan. Program managers and the ACSIM staff participate in the management review, consider outcomes from the management review, and make necessary adjustments for continual improvement of the environmental cleanup strategy and this strategic plan.

## Program Build and Execution Chart



## Army Excess Installation Restoration

### Background

The Army has identified a total of 14 installations that are excess to operational needs and, although not covered by Base Realignment and Closure (BRAC) legislation, the Army plans to dispose of those 14 installations. These properties are primarily Army ammunition plants (AAPs) for which the Army funded cleanup under both DERP and Compliance-Related Cleanup programs. The Army assigned responsibility for completing necessary cleanup and disposal of 13 of these installations to the Army BRAC Division to utilize the staff's expertise to complete transfer of these non-BRAC installations. The US Army Corps of Engineers manages the remaining excess installation (Cornhusker AAP).

### Program Drivers

Several statutes and regulations affect the excess installations' cleanup program. Most notable are DERP (10 USC §§2701-3), CERCLA, RCRA, EOs 12580 and 13016, DODD 4715.7, DERP Guidance, AR 200-1.

### Investment and Progress

The Army uses ER,A as well as compliance funds to clean up excess installations. Through FY2004, the Army spent a total of \$1.9 billion at these excess installations under the Army DERP. The estimated cost to achieve RIP/RC is \$0.9 billion. Through FY2004, the Army reached RIP/RC at 572 sites at the excess installations, while 175 sites remain to be addressed.

The Army developed the AEDB-CC as the database of record for compliance-related cleanup and began populating the database in the fall of 2004. AEDB-CC requirements at excess installations include lead and asbestos abatement, building demolition and debris removal, as well as hazardous waste cleanup not eligible under the DERP, to enable property transfer. The Army tracks funds for excess installations through the Army financial reporting system using management decision package (MDEP) EXCS.

The Army expects to transfer the first of 14 excess installations in 2006.

## Mission Statement for Army Excess Installation Restoration

The mission for Army excess installation restoration is to perform appropriate, cost-effective cleanup to provide property that is safe for transfer and projected reuse, and to protect human health and the environment.

### Excess Installations

Badger AAP, Baraboo, WI  
 Charles Melvin Price Support Center, Granite City, IL  
 Cornhusker AAP, Grand Island, NE  
 Indiana AAP, Charlestown, IN  
 Joliet AAP, Joliet, IL  
 Kansas AAP, Parsons, KS  
 Longhorn AAP, Marshall, TX  
 Ravenna AAP, Ravenna, OH  
 Rocky Mountain Arsenal, Commerce City, CO  
 St. Louis AAP, St Louis, MO  
 Sunflower AAP, DeSoto, KS  
 Tarheel Army Missile Plant, Burlington, NC  
 Twin Cities AAP, Arden Hills, MN  
 Volunteer AAP, Chattanooga, TN

## **Objectives, Targets, and Success Indicators for the Army Excess Installation Restoration Program:**

Note: For Objectives 1-9, USAEC conducts the IRP for Excess installations just as they do for Active Installations.

The BRAC Division conducts compliance-related cleanup at excess installations using the same guidelines as for compliance-related cleanup, except that the BRAC Division also conducts some lead and asbestos abatement activities and building demolition/debris removal activities at Excess Installations that would not be eligible for environmental funding at Active/Guard/Reserve installations.

Objectives, targets and success indicators are formatted as follows:  
10. Objective.  
    10.1. Target(s) for this objective.  
        10.1.1. Success indicator(s) for this target.

10. Make excess installation property environmentally suitable for transfer.
  - 10.1. Develop a cogent plan (an Army Property Disposal Plan) to transfer property at excess installations by end of first quarter, FY06.
  - 10.2. Develop comprehensive strategy for addressing post-transfer cleanup issues not later than six months prior to anticipated date of transfer as specified in the Army Property Disposal Plan.
  - 10.3. Complete required environmental site assessments (ASTM Phase I and II activities as well as CERFA determination) of all excess installations by end of FY07.
    - 10.3.1. 50% of excess installations have environmental site assessments complete by end of FY06.
    - 10.3.2. 100% of excess installations have environmental site assessments complete by end of FY07.
  - 10.4. Work with USAEC to establish by FY06 and maintain a database to track and manage land use controls created as part of a restoration program response action.
    - 10.4.1. Database is established and contains at least one existing ROD/DD with LUC by end of FY07.
    - 10.4.2. Future ROD/DDs with LUCs added within six (6) months of ROD/DD signature.

## **Reporting Mechanisms**

The Army uses the AEDB-R and AEDB-CC databases for excess installation cleanup reporting. AEDB-R contains site level detail by phase of cleanup (studies, design and construction, long-term management) for contaminated sites being addressed by the Army DERP. In addition, the database contains cost, relative risk, and other information for each site. AEDB-CC contains site level information for compliance-related cleanup and property transfer requirements development and reporting. The USAEC manages the AEDB and installations update the data semi-annually. The AEDB-R is the source for upward reporting to the Knowledge-Based Corporate Reporting System and the Restoration Management Information System used by OSD to support development of the DERP Annual Report to Congress.

The Army uses information from AEDB to support cleanup program planning, implementation, and semiannual management reviews.

## **Management Review**

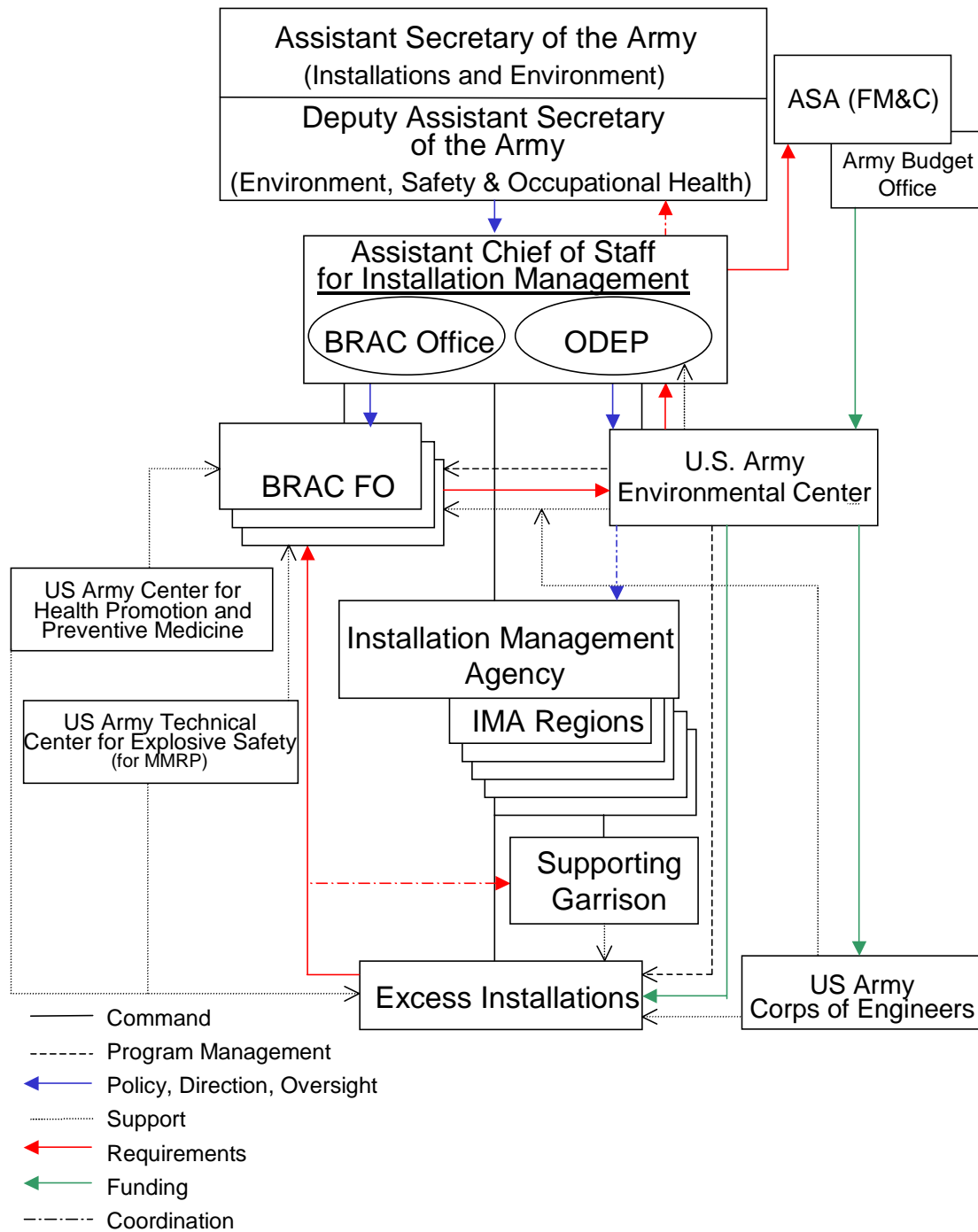
The Army Base Realignment and Closure Division (DAIM-BD) directly manages Operation and Maintenance, Army (OMA) funds to provide caretaking activities at twelve excess installations; the Corps of Engineers executes this function for Cornhusker Army Ammunition Plant (AAP). The USAEC manages the ER,A funds necessary to fund DERP-related cleanup at excess installations. For DERP-related cleanup, DOD established a regular series of semi-annual reviews where the Army reports progress in meeting objectives and targets. The Principal Deputy Under Secretary of Defense for Installations and Environment is typically the senior reviewer.

As the Army prepares to brief OSD, the Deputy Assistant Secretary of the Army for Environment, Safety, and Occupational Health is the senior Army reviewer. These reviews include program specific issues that OSD requires, as well as Army-specific objectives and targets addressed in the Army environmental cleanup strategic plan. Program managers and the ODEP staff participate in the management review, consider outcomes from the management review, and make necessary adjustments for continual improvement of the environmental cleanup strategy and this strategic plan.



Program Build and Execution Chart

# Army Excess Installations DERP



## Formerly Used Defense Sites

### Background

DOD is responsible for accomplishing environmental restoration of contamination caused by DOD or building/debris safety hazards on properties that were under the jurisdiction of the Secretary of Defense and owned by, leased to, or possessed by the United States prior to 17 October 1986. The Office of the Secretary of Defense is responsible for overall FUDS program policy and budget guidance, developing and defending the budget, and reviewing program performance. The Army is the executive agent for the FUDS program, and the U.S. Army Corps of Engineers (USACE) is the program's executing agent and day-to-day manager. Because DOD no longer owns or uses the FUDS properties, a USACE District commander serves as each property's installation commander, executing environmental restoration projects and fulfilling associated responsibilities.

USACE has traditionally categorized projects at FUDS properties as:

- Hazardous, toxic, and radioactive wastes (HTRW) projects
- Containerized HTRW (CON/HTRW) projects (typically underground and aboveground storage tanks)
- Military Munitions Response Program (MMRP) projects (formerly designated as OE or Ordnance and Explosives Waste (OE/W)) including response actions related to munitions and explosives of concern (MEC), munitions constituents (MC), and chemical warfare material (CWM)
- Building demolition and debris removal (BD/DR) projects
- Potentially responsible party (PRP) projects, including Third-Party-Sites (TPS)

### Program Drivers

FUDS is part of the DERP as described earlier. The DERP Management Guidance further describes objectives for the program. The Army does not typically supplement the DOD DERP Management Guidance for the FUDS program. Detailed instructions for conducting the program are in USACE Engineer Regulation 200-3-1, FUDS Program Policy.

### Investment and Progress

At the end of FY2004, there were 9,730 potential FUDS properties in the United States and its territories that had been entered in the FUDS inventory database. In determining whether a property was eligible for inclusion in the FUDS program, preliminary information was reviewed and 6,789 properties are eligible for inclusion in the FUDS program. Requirements for response actions exist at 2,948 properties. The USACE has 4,871 projects in its inventory to address required response actions, and to date has completed 2,678 of those projects. Additional properties are identified each year.

USACE had obligated \$3.3 billion through fiscal year 2004 (annual funding has been about \$250 million in recent years) and estimates \$18.1 billion to complete the program\*. Overall program funding has remained relatively stable in the recent past, and is projected to remain stable until funding for MMRP implementation is increased; targets in this plan are based on stable funding.

	SUMMARY		
	FY02	FY04	DELTA
Potential FUDS Properties:	9,334	9,730	+396
Eligible Properties	6,745	6,789	+ 44
Properties w/ Response Action	2,822	2,948	+126
Projects in Database	4,657	4,871	+214
Completed Projects	2,565	2,678	+113

\* The cost to complete is consistent with the DERP Annual Report to Congress and does not include program management costs.

## Mission Statement for the FUDS Program

The cleanup mission for the FUDS program is to employ a risk management approach to perform appropriate, cost-effective cleanup of contamination caused by DOD and to protect human health, safety, and the environment.

## Objectives, Targets, and Success Indicators for the FUDS Program:

Objectives, targets and success indicators are formatted as follows:

1. Objective.
  - 1.1. Target(s) for this objective.
    - 1.1.1. Success indicator(s) for this target.

1. Ensure prompt action to address imminent and substantial threats to human health, safety, and the environment.
  - 1.1. Protect workers, the public, and the environment as hazards are identified.
    - 1.1.1. Lost time accidents as a result of environmental hazards as reported through safety and command channels are in line with USACE established incident and frequency rates.
    - 1.1.2. Appropriate notification(s) made to command, regulators and public in accordance with established plans.
    - 1.1.3. Hazards and environmental risks are addressed through interim response actions, as appropriate.
2. Conduct appropriate, cost-effective efforts to identify, evaluate, and, where necessary to protect public safety or human health and the environment, conduct response actions to address contamination resulting from past DOD activities. Maintain relevant cleanup information in a permanent document repository.
  - 2.1. Develop an execution strategy to have remedy in place or response complete for the Installation Restoration Program (IRP) Category (throughout this document, IRP means HTRW and CON-HTRW projects, unless otherwise noted) portion of the FUDS program by FY2020.
    - 2.1.1. All IRP projects projected to miss the FY2020 target identified at the end of each program year.
    - 2.1.2. All IRP projects projected to miss the FY2020 target reviewed and evaluated for management alternatives during the mid-year in-progress review (IPR) using information from current and prior year end-of-year data.
  - 2.2. Meet the FY2020 Defense goal to have a remedy in place (RIP) or be response complete (RC) for all IRP projects.
    - 2.2.1. RIP/RC achieved at 50% of high relative risk IRP projects by end of FY2006.

- 2.2.2. RIP/RC achieved at 60% of all high relative risk IRP projects by end of FY2007.
- 2.2.3. RIP/RC achieved at 100% of high relative risk IRP projects by end of FY2011.
- 2.2.4. RIP/RC achieved at 60% of medium relative risk IRP projects by end of FY2011.
- 2.2.5. RIP/RC achieved at 85% of non-PRP NPL properties by end of FY2014 by completing 1 property per year beginning in FY2006.
- 2.2.6. 100% of all IRP projects at RIP/RC by end of FY2020.
- 2.3. Achieve RIP/RC for 2145 out of 2678 total restoration projects by end of FY2007.
  - 2.3.1. 2066 restoration projects at RIP/RC in FY2006.
  - 2.3.2. 2145 restoration projects at RIP/RC in FY2007.
  - 2.3.3. 2678 restoration projects at RIP/RC by FY2020.
- 2.4. Meet actual versus planned activities on a quarterly basis as projected in the DASA(ESOH)-approved FUDS Annual Work Plan.
  - 2.4.1. 90% and greater of planned annual activities met is GREEN.
  - 2.4.2. 80% - 89% is YELLOW.
  - 2.4.3. Less than 80% is RED.
- 2.5. Achieve RIP/RC at 90 additional FUDS properties by end of FY07, based on end of FY05 property RIP/RC statistics (Property RIP/RC means all projects at that property are RIP/RC).
  - 2.5.1. 50 additional FUDS properties at RIP/RC by end of FY06.
  - 2.5.2. 40 additional FUDS properties at RIP/RC by end of FY07.
- 2.6. Continue to make progress completing CON/HTRW projects by programming up to 6% of the program funding each year through the POM years. CON/HTRW projects should contribute to property RIP/RC targets.
- 2.7. Continue to make progress completing BD/DR projects by programming up to 3% of the program funding each year through the POM years. BD/DR projects should contribute to property RIP/RC targets.
- 2.8. Establish annual workplan targets with quarterly milestones to achieve project RIP/RC.
  - 2.8.1. 90% and greater of the planned number achieved based on established quarterly milestones (GREEN).
  - 2.8.2. 80% - 89% is YELLOW.
  - 2.8.3. Less than 80% is RED.

- 2.9. Continue to refine the MMRP funding allocation from FY05 and through the POM. Plan to meet the OSD goal of completing all SIs by 2010 by obligating \$25 million in FY06 and \$25 million in FY07 toward the SI completion goal.
  - 2.9.1. 10% of SIs complete by the end of FY06.
  - 2.9.2. 30% of SIs complete by the end of FY07.
  - 2.9.3. All SIs under the MMRP complete by the end of FY2010.
- 2.10. Continue to execute the FUDS Information Improvement Plan (FIIP); plan to complete the FIIP by the end of FY09. Maintain a permanent document repository of cleanup information for all 9,730 FUDS properties so that eligibility and cleanup information can be retrieved at any date in the future.
  - 2.10.1. 5,500 properties have Task 1 complete in FY2006.
  - 2.10.2. 7,300 properties have Task 1 complete in FY2007.
  - 2.10.3. Land use controls are a part of the document repository.
- 2.11. For each project, ensure that management procedures for accountability are identified and in place for forecasting and attaining milestones toward reaching RIP/RC.
  - 2.11.1. HQ USACE program manager has procedures in place including periodic reviews with MSC FUDS program managers and District program managers to identify and resolve issues that may impede progress.
  - 2.11.2. District commanders accountable for the success of their subordinates in actively identifying and effectively resolving issues that could hinder reaching RIP/RC targets.
  - 2.11.3. An organization and an individual are identified and accountable (via performance appraisals or other means) for forecasting and attaining milestones toward reaching RIP/RC for each project.
3. Comply with statutes, regulations, Executive Orders, and other external requirements governing cleanup.
  - 3.1. Assist OSD with development of the MMRP prioritization protocol and rule making.
  - 3.2. Develop a plan to display potential consequences of the new DOD MMRP prioritization model on FUDS in lieu of the existing RAC priority process (e.g., impact of re-evaluation of the MMRP model on FUDS).
    - 3.2.1. Priority setting model is consistent with FUDS investment profile and responsive to stakeholder concerns.
    - 3.2.2. Priority setting model provides a logical approach for application to the FUDS universe of projects.
  - 3.3. Anticipate and immediately come into compliance with new or revised enforceable requirements.

- 3.3.1. No fines or penalties.
- 3.4. Use the USACE's mission-focused ISO 14001 Environmental Management System (EMS) to continually upgrade performance of the FUDS cleanup program.
  - 3.4.1. Cleanup considerations are included in USACE's EMS implementation plans at Districts managing FUDS cleanup activities, as appropriate.
- 3.5. Identify potential program impacts, including funding requirements and delays to meeting established goals, when chemicals of emerging concern are indicated, such as perchlorate, for inclusion in the OSD PPBES process.
  - 3.5.1. DAIM(EDC) notified within three months of identifying potential impacts.
- 4. Ensure that Army regulations, policies, and guidance are developed within the framework of the Army Environmental Cleanup Strategy.
  - 4.1. Recommend changes as required to Army Regulation 200-1.
  - 4.2. Revise Engineer Regulation 200-3-1, FUDS Program Policy as required (total revision or page changes, as appropriate).
    - 4.2.1. An established business process exists, clearly demonstrating how updates/changes to the Engineer Regulation will occur.
    - 4.2.2. Publish updated Engineer Regulation 200-3-1, FUDS Program Policy within 180 days of promulgation of OSD's DERP Management Guidance.
  - 4.3. Develop specific performance metrics and describe the FUDS program management approach for accomplishing cleanup by developing an annual Program Management Plan (PMP).
    - 4.3.1. Specific metrics established with annual submission of the PMP.
    - 4.3.2. PMP delivered to DAIM(ED) NLT 15 September each year.
- 5. Plan, program, budget, and execute cleanup in accordance with DOD and Army directives and guidance using validated, auditable project-level data.
  - 5.1. Execute the annual DERP appropriation for the FUDS program to meet DOD obligation and expense objectives.
    - 5.1.1. Obligation targets by quarter are 28%, 55%, 80%, and 100%, as recorded in DFAS.
    - 5.1.2. Expense targets over 5 years are 22%, 67%, 89%, 95%, and 100%, as recorded in DFAS.
  - 5.2. Include a cleanup program long-term course of action (exit strategy) in property-specific Management Action Plans (MAPs) annually for each project included in a Statewide MAP, and all projects with RD/RA underway.
    - 5.2.1. Each Statewide MAP includes an exit strategy for each property in the plan.

- 5.2.2. Projects with RD/RA underway have an exit strategy.
- 5.3. Given that FUDS cleanup extends into the second half of the 21<sup>st</sup> century when MMRP responses are considered, assist HQDA to identify additional funding in order to meet DOD FMR goals.
  - 5.3.1. Defense Comptroller requirements concerning submittal of program and budget documents are met in accordance with the Program Objective Memorandum (POM), Programming Data Requirements, and DOD FMR instructions and exhibits.
  - 5.3.2. FUDSMIS is populated with data vital to meeting planning, programming, budgeting, execution, and reporting requirements, as well as determining proper allocation of resources.
- 5.4. Achieve Federal Financial Management Improvement Act (FFMIA) compliance by FY10.
  - 5.4.1. Qualified audit opinion received by end of FY07.
  - 5.4.2. Unqualified audit opinion received by end of FY10.
  - 5.4.3. Management information maintained in a single database of record.
- 5.5. Continue, as required, to implement standardized processes and procedures for introducing rigor, responsibility and accountability in management of FUDS cleanups.
  - 5.5.1. RACER estimates are used for developing cost estimates where more accurate engineering cost estimates from an RI/FS may not exist.
  - 5.5.2. Documentation supporting the cost estimate is retained for future audit.
  - 5.5.3. Responsibility and accountability are addressed in the program management plan.
- 6. Develop cleanup partnerships with appropriate federal, Tribal, state, local, or territorial authorities.
  - 6.1. Develop Statewide Management Action Plans, with respective State and EPA region participation, to promote coordination and cooperation at rate of 7 new plans per year until completion, subject to willingness of States to participate.
    - 6.1.1. 43 plans complete by the end of FY2006.
    - 6.1.2. 50 plans complete by the end of FY2007.
    - 6.1.3. 55 plans complete by the end of FY2008, or maintain current (updated every other year) information that a State does not desire a Statewide MAP.
    - 6.1.4. Existing plans updated annually to include coordination with federal land managers.
    - 6.1.5. For states that do not participate, a reconciled inventory of FUDS properties exists.

- 6.2. Review state participation in property activities under DSMOA as required.
    - 6.2.1. States and USACE Districts coordinate with each other according to the six-step cooperative agreement.
  - 6.3. Involve regulatory stakeholders (including federal land managers) in annual property-specific Management Action Plan (MAP) development/revision process.
    - 6.3.1. Regulatory stakeholders involved in MAP development.
  - 6.4. Participate in EPA/state partnering sessions, typically sponsored by the DOD regional environmental offices in each EPA region.
    - 6.4.1. Regional environmental offices are aware of FUDS issues and assisting to resolve as appropriate.
  - 6.5. Develop a process to reconcile USACE and EPA property inventories on an annual basis by the end of FY2006.
    - 6.5.1. A reconciled inventory (as of 30 September) is provided to EPA and ASTSWMO annually, not later than 1 December.
  - 6.6. Provide the FUDS PRP inventory (as of 30 Sep) to EPA and the Association of State and Territorial Solid Waste Management Officials annually, not later than 1 December.
7. Promote and support public stakeholder participation in the cleanup process, as appropriate, and make project-level cleanup information publicly available.
    - 7.1. Update public GIS with end of fiscal year cost-to-complete information and narratives annually to coincide with release of the DERP Annual Report to Congress, typically not later than 15 April.
    - 7.2. Update Executive Management System for regulators annually, not later than 15 April.
    - 7.3. For FUDS properties included in the Annual Work Plan and for which no RAB currently exists, survey community for interest in establishing a RAB every 2 years or when a MMRP project is initiated.
      - 7.3.1. Interest determined every 2 years, as scheduled.
      - 7.3.2. Interest is solicited within 3 months of initiation of MMRP projects.
    - 7.4. As required by CERCLA, the NCP, and the DERP Management Guidance, maintain an information repository so that IRP cleanup information is available to the public.
      - 7.4.1. An administrative record and information repository available at a single government location.
      - 7.4.2. For NPL properties, an administrative record and information repository at a single government location and a comprehensive information repository available to the public at a location off the property.
    - 7.5. Involve RAB members in annual MAP development/revision as appropriate.



- 7.5.1. Public stakeholders involved in MAP development, especially when specific project concerns have been expressed.
8. Support the development and use of cost-effective cleanup approaches and technologies to improve program efficiency.
  - 8.1. Participate in the ongoing initiative with USAEC to consider consolidating post remedy-in-place activities on a regional basis, to include exit strategies and incentives for early termination.
    - 8.1.1. All projects with long-term management (LTM) activity in FY2006 considered in the consolidation initiative.
    - 8.1.2. 20% of the RA(O)/LTM program budget in FY06 obligated in the consolidation initiative.
    - 8.1.3. 40% of the RA(O)/LTM program budget in FY07 obligated in the consolidation initiative.
  - 8.2. Implement the Performance Based Contract (PBC) initiative to reach a target of obligating 50% of the total program budget by the end of FY10.
    - 8.2.1. 15% of the total program budget obligated in FY06 in PBCs.
    - 8.2.2. 25% of the total program budget obligated in FY07 in PBCs.
  - 8.3. Streamline program management to maximize the amount of funding going to actual remediation at project sites.
    - 8.3.1. Program management costs (including ATSDR, DSMOA, FIIP, RAB, and TAPP costs, but excluding set-asides for perchlorate and the RCWM security study) do not exceed 14% of total ER,FUDS program (Based on a \$220M annual program) in FY06.
    - 8.3.2. Program management costs (including ATSDR, DSMOA, FIIP, RAB, and TAPP costs, but excluding set-asides for perchlorate and the RCWM security study) do not exceed 13.5% of total ER,FUDS program (Based on a \$220M annual program) in FY07.
    - 8.3.3. Program management costs (including ATSDR, DSMOA, RAB and TAPP costs) do not exceed 10% in FY11.
  - 8.4. Identify innovative and/or more efficient technologies, evaluate for program/project applicability, and implement as appropriate.
    - 8.4.1. 50% of ongoing remedial action projects evaluated for application of innovative and/or more efficient technologies or program efficiencies by the end of FY06.
    - 8.4.2. 60% of ongoing remedial action projects evaluated for application of innovative and/or more efficient technologies or program efficiencies by the end of FY07.
    - 8.4.3. Discussion of use of innovative technologies is a part of each Management Review

9. Perform semi-annual senior management reviews of cleanup progress against established targets, and periodic reviews of projects where contamination remains in place.
  - 9.1. Develop the schedule for the mid-year and year-end senior management reviews NLT 31 December of each year.
    - 9.1.1. Meetings occur IAW the established schedule.
  - 9.2. Ensure the appropriate program managers present success indicators identified in the strategic plan as part of the semi-annual senior management review.
    - 9.2.1. Timelines are developed and responsible respondents are tasked as part of the review for identified deficiencies. Required follow-ups are incorporated into the next scheduled review.

## **Reporting Mechanisms**

The DERP Annual Report to Congress (ARC) requires collection of data concerning phase progress and meeting milestones, and serves as the catalyst for reporting in the FUDS program. Preparation of the annual President's budget further drives reporting of FUDS program requirements and justification for those future expenditures. USACE Districts update FUDSMIS as required when there are status changes to property/project/phase information; and the information is used at all levels to manage the program. Snapshots taken from FUDSMIS are used for upward reporting and to provide data for ARC preparation, environmental liabilities reporting, and budget preparation.

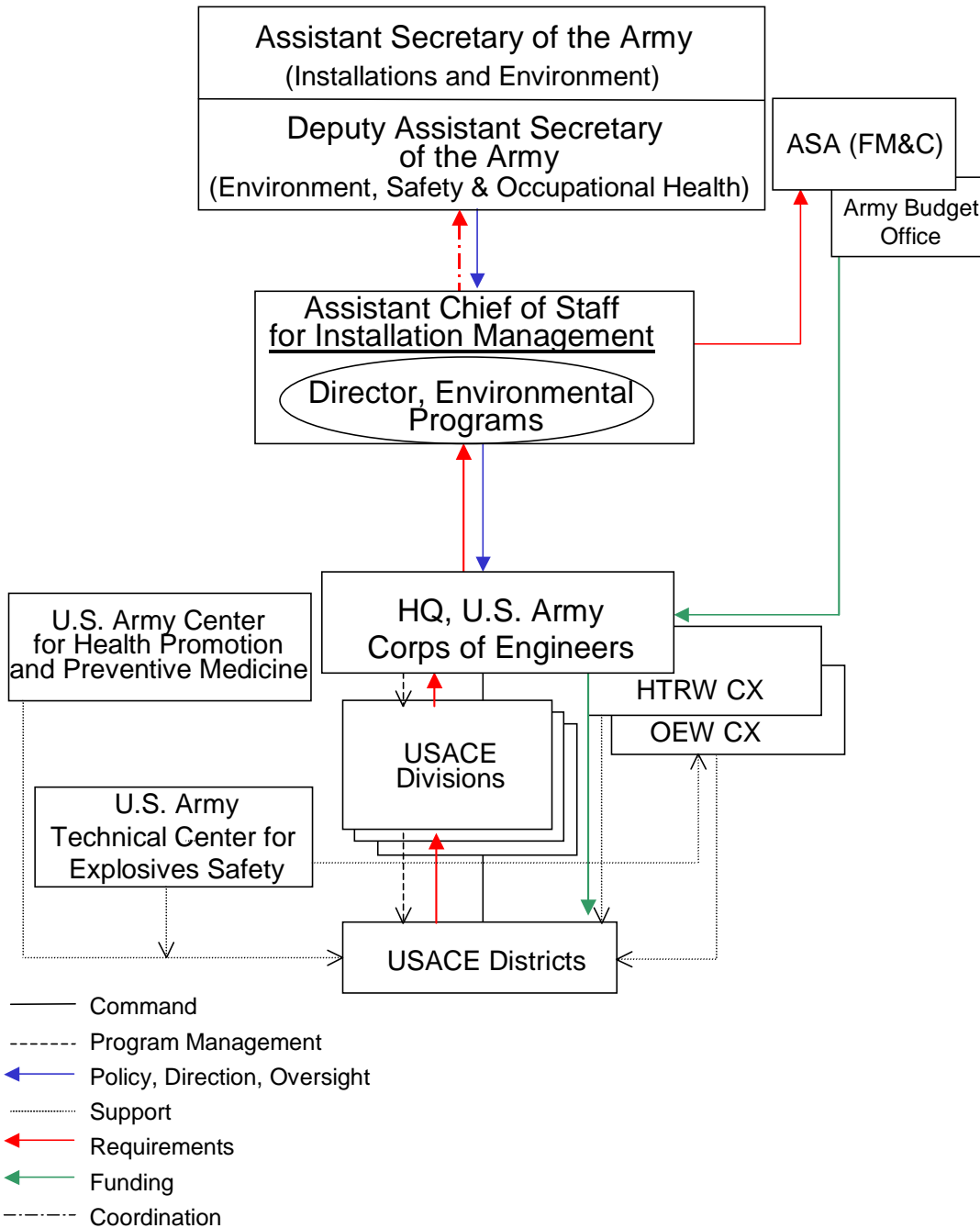
## **Management Review**

OSD has established semi-annual in-progress reviews where the Army is required to address progress in meeting objectives and targets. The Principal Deputy Under Secretary of Defense for Installations and Environment is typically the senior reviewer.

As the Army prepares to brief OSD, the Deputy Assistant Secretary of the Army for Environment, Safety, and Occupational Health is the senior Army reviewer. Program specific issues that OSD requires are included, as well as FUDS-specific objectives and targets addressed in the Army environmental cleanup strategic plan. Program managers and the ODEP staff participate in the management review. Outcomes from the management review are considered and necessary adjustments are made for continual improvement of the environmental cleanup strategy and this strategic plan.

Program Build and Execution Chart

**DERP FUDS Properties**



## Army Compliance-Related Cleanup (Non-DERP)

### Background

The Army conducts its operations in compliance with numerous environmental laws and regulations, to include cleanup of environmental contamination associated with its day-to-day (non-combat) operations. Cleanup actions addressed via this program include contamination that has occurred since the enactment of the Superfund Amendment and Reauthorization Act (SARA) in October 1986, and thus by OSD policy are not eligible for inclusion in the Defense Environmental Restoration Program (DERP). In addition, compliance-related cleanup addresses cleanup of contamination, regardless of timeframe, at non-federally owned, federally supported ARNG sites. Post SARA cleanups are funded using operational funds.

### Program Drivers

The Federal Facilities Compliance Act of 1993 clarified that federal facilities are subject to the nation's environmental laws, including provisions that individuals are subject to fines and penalties as they conduct official duties. The Resource Conservation and Recovery Act (RCRA), enacted in 1976, legislated how society manages its solid wastes and provided a definition and a list of wastes considered to be hazardous. Other potential program drivers for compliance-related cleanup include the Comprehensive Environmental Response, Compensation, and Liability Act, the Safe Drinking Water Act, the Toxic Substances Control Act, Federal Insecticide, Fungicide, and Rodenticide Act, the Clean Air Act, and the Clean Water Act.

### Program Management

The Installation Management Agency (IMA) is the program manager responsible for planning, budgeting and executing compliance-related cleanup at installations where operations are funded from the Operations and Maintenance, Army (OMA) and Operations and Maintenance, Army Reserve (OMAR) accounts. The ARNG is the PM responsible for planning, budgeting and executing compliance-related cleanup at ARNG facilities using funds from the Operations and Maintenance, National Guard (OMNG) fund account.

### Investment and Progress

Investment in compliance-related cleanup was highly decentralized and past investments were not centrally reported. Future requirements looked at the next 5-6 years, but not necessarily through site closure. The Federal Financial Management Improvement Act (FFMIA) created financial liability reporting requirements for all cleanup activities through site closure. The Army developed the Army Environmental Database for Compliance-related Cleanup (AEDB-CC) as the database of record for compliance-related cleanup and began populating the database in FY04. The AEDB-CC will enable accurate reporting of environmental investments and liabilities as well as progress toward cleanup of compliance-related contamination.

The Army will conduct semi-annual program management reviews of cleanup progress against established targets, and periodic reviews of sites where contamination remains in place.

## Mission Statement for Compliance-Related Cleanup (Non-DERP)

The cleanup mission of Army compliance-related cleanup is to perform appropriate, cost-effective cleanup to provide property that is safe for Army use, will sustain operations and training, and is protective of human health and the environment.

### Objectives, Targets, and Success Indicators for Compliance-Related Cleanup (Non-DERP):

Objectives, targets and success indicators are formatted as follows:

1. Objective.
  - 1.1. Target(s) for this objective.
    - 1.1.1. Success indicator(s) for this target.

1. Ensure prompt action to address imminent and substantial threats to human health, safety, and the environment.
  - 1.1. Protect workers, the public, and the environment as hazards are identified.
    - 1.1.1. Appropriate notification(s) made to command, regulators and public in accordance with established plans.
  - 1.2. Provide advice and expertise to operational commanders, as required, to respond to and minimize imminent and substantial threats to human health, safety, and the environment.
    - 1.2.1. Emergency Response Plans result in minimal impacts to human health, safety, and the environment.
    - 1.2.2. Operational entities are informed of activities that may result in contamination, and are provided possible alternatives.
  - 1.3. Where applicable, practice pollution prevention to ensure current operations and ongoing cleanup activities create no new threats to human health and the environment.
2. Conduct appropriate, cost-effective efforts to identify, evaluate, and, where necessary to protect public safety or human health and the environment, conduct response actions to address contamination resulting from DOD activities. Maintain relevant cleanup information in a permanent document repository.
  - 2.1. Maintain an inventory of contaminated sites and incorporate newly identified sites into AEDB-CC and update the database semi-annually.
    - 2.1.1. Newly identified sites in database prior to semi-annual data call.
  - 2.2. Ensure AEDB-CC supports the overall management of the Compliance-related Cleanup Program.
    - 2.2.1. System capability evaluated during semi-annual concurrent reviews.
    - 2.2.2. System changes requested in time for future data calls.

- 2.2.3. Required information entered into the database.
- 2.3. Maintain a permanent document repository of cleanup information, regardless of funding source, so that cleanup information can be retrieved at any date in the future.
  - 2.3.1. Comprehensive permanent document repository that reflects all environmental cleanup at an active installation that is up to date; the 40% of installations that will have documentation complete at end of FY06 are identified; the 70% of installations that will have documentation complete at end of FY07 are identified; 100% of installations have documentation complete at end of FY08; new documents for all installations submitted within 60 days of receipt.
- 2.4. Work with the Army to establish procedures and standardized data to centrally track and manage land use controls created as part of a cleanup program response action.
  - 2.4.1. Information concerning land use controls is transmitted to the central database within 60 days of receipt.
- 2.5. For each site, obtain geospatial coordinates at a scale commensurate with the scope of the project and send to the US Army Installation Geospatial Information and Services Program office. Follow the guidance in DAIM-MD (AR 210-20) Memorandum dated 16 October 2001, Subject: Data Standards for Computer Aided Drafting and Design (CADD), Geographic Information System (GIS) and Related Technologies.
  - 2.5.1. Environmental cleanup liability information is identified and available for linking with installation real property inventory.
- 2.6. For each site, ensure that management procedures for accountability are identified and in place for forecasting and attaining milestones toward reaching RIP/RC.
  - 2.6.1. Program managers have procedures in place including periodic reviews with supervisory and quality control reviewers to identify and resolve issues that may impede progress.
  - 2.6.2. Supervisory reviewers are being held accountable for the success of their subordinates in actively identifying and effectively resolving issues that could hinder reaching RIP/RC targets.
  - 2.6.3. An organization and an individual to be held accountable (via performance appraisals or other means) are identified for each site.
- 3. Comply with statutes, regulations, Executive Orders, and other external requirements governing cleanup.
  - 3.1. Anticipate and promptly achieve compliance with new or revised enforceable requirements.
    - 3.1.1. No fines or penalties.

- 3.2. Use the installation's mission-focused ISO 14001 EMS to continually improve performance of the compliance-related cleanup program.
  - 3.2.1. Cleanup considerations are included in installation EMS implementation plans at installations with cleanup activities.
- 3.3. Identify potential program impacts, including funding requirements and delays to meeting established goals, when regulatory changes occur.
  - 3.3.1. DAIM(EDC) notified within three months of identifying potential impacts.
4. Ensure that Army regulations, policies, and guidance are developed within the framework of the Army Environmental Cleanup Strategy.
  - 4.1. Recommend changes as required to appropriate Army Regulations, policies, and guidance.
  - 4.2. Incorporate appropriate policy and guidance into regulations and guidance documents within 180 days of policy issuance.
  - 4.3. Develop specific performance metrics and describe the program management approach for accomplishing compliance-related cleanup by developing an annual Program Management Plan.
    - 4.3.1. Specific metrics established with annual submission of the Program Management Plan (PMP).
    - 4.3.2. PMP(s) delivered to DAIM(ED) NLT 15 September each year.
5. Plan, program, budget, and execute cleanup in accordance with DOD and Army directives and guidance using validated, auditable, and documented site-level data.
  - 5.1. Execute the annual appropriations to meet DOD obligation and expense objectives.
    - 5.1.1. Obligation targets by quarter are 28%, 55%, 80%, and 100%, as recorded in DFAS.
    - 5.1.2. Expense targets over 5 years are 22%, 67%, 89%, 96%, and 100%, as recorded in DFAS.
  - 5.2. Establish funding guidance for compliance-related cleanup.
    - 5.2.1. Guidance provided to the field one quarter prior to AEDB-CC submission.
  - 5.3. Develop and update annually a CC Installation Action Plan (IAP) and conduct action plan workshops.
    - 5.3.1. IAP workshops conducted at Army installations.
    - 5.3.2. Cleanup program exit strategy in all IAPs.
  - 5.4. Continue, as required, to implement standardized processes and procedures for introducing rigor, responsibility and accountability in management of the compliance-related cleanups.

- 5.4.1. RACER estimates are used for developing cost estimates where more accurate engineering cost estimates from an RI/FS may not exist.
- 5.4.2. Documentation supporting the cost estimate is retained for future audit.
- 5.4.3. Responsibility and accountability are addressed in program management plans.
- 5.5. Achieve Federal Financial Management Improvement Act (FFMIA) compliance by FY10.
  - 5.5.1. Receive qualified audit opinion by end of FY07.
  - 5.5.2. Receive unqualified audit opinion by end of FY10.
  - 5.5.3. Financial management information collected and maintained in an FFMIA-compliant single database of record.
- 6. Develop cleanup partnerships with appropriate federal, tribal, state, local, territorial, or host-nation authorities.
  - 6.1. Establish or participate in forums such as EPA/state partnering sessions, typically sponsored by the DOD regional environmental offices in each EPA region.
    - 6.1.1. Regional environmental offices are aware of compliance-related cleanup issues and assisting to resolve as appropriate.
- 7. Support public stakeholder participation in the cleanup process, as appropriate, and make site-level cleanup information available to the public.
  - 7.1. Establish, for new sites, and maintain for all sites an information repository of cleanup information at installations so that cleanup information is available to the public.
    - 7.1.1. An administrative record and information repository available at a single location on the installation.
- 8. Support the development and use of cost-effective cleanup approaches and technologies to improve program efficiency.
  - 8.1. Consider performance-based contracting and other approaches as appropriate for cleanup projects.
- 9. Perform semi-annual program management reviews of cleanup progress against established targets, and periodic reviews of sites where contamination remains in place.
  - 9.1. Develop the schedule for the mid-year and year-end reviews NLT 31 December of each year.
    - 9.1.1. Meetings occur IAW the established schedule.
  - 9.2. Ensure the appropriate program managers present success indicators identified in the strategic plan as part of the semi-annual review.



- 9.2.1. Timelines and responsible respondents are tasked as part of the review for identified deficiencies. Required follow-ups are incorporated into the next scheduled review.

## **Reporting Mechanisms**

In the fall of 2004, the Army began using the AEDB-CC to gather requirements and report financial liability. The Army previously used the Environmental Program Requirements (EPR) reporting system to report requirements for compliance related cleanup.

## **Management Reviews**

Management reviews are conducted semi-annually for compliance-related cleanup programs. The framework for management review is this strategic plan and the program management plans that the IMA and NGB develop annually. Where appropriate, installation action plan workshops address CC requirements. Army IMA regional offices and ARNG are responsible for quality control of all CC projects in the AEDB-CC. The USAEC also participates to provide quality assurance and help resolve any discrepancies as appropriate.

The Army will conduct in-progress reviews for the Army leadership at least to the ODASA(ESOH) level twice a year. Compliance-related cleanup objectives and targets addressed in the Army environmental cleanup strategic plan will provide the foundation for the in-progress review. Program managers and the ODEP staff will participate in the management review. Outcomes from the management review are considered and necessary adjustments are made for continual improvement of the environmental cleanup strategy and this strategic plan.



## Army Special Installations Compliance-Related Cleanup (Non-DERP)

### Background

Special installations refer, for the purposes of this document, to installations that receive mission funds or Army Working Capital Funds (AWCF) to conduct traditional garrison operations in support of their primary mission. The ER,A funded DERP eligible cleanups at the special installations are governed by the same rules and metrics as those for installations receiving OMA funding. Similarly, mission or working capital funded RCRA corrective action cleanups will have the same metrics as those for OMA funded garrisons. The major difference in how these installations are managed stems from the source of funding. Special installations receive ER,A funds to address DERP eligible projects and are therefore, visible within the DERP metrics. Special installations use mission funds or AWCF to conduct compliance related cleanup. Additionally, DASA(ESOH) established a requirement for commanders of special installations to report environmental liabilities using AEDB-CC and comply with the metrics developed for compliance-related cleanups, regardless of fund source.

### Program Drivers

The Federal Facilities Compliance Act of 1993 clarified that federal facilities are subject to the nation's hazardous waste laws, including provisions that individuals are subject to fines and penalties as they conduct official duties. The Resource Conservation and Recovery Act (RCRA), enacted in 1976, legislated how society manages its solid wastes and provided a definition and a list of wastes considered to be hazardous. Other potential program drivers for compliance-related cleanup include the Comprehensive Environmental Response, Compensation, and Liability Act, Safe Drinking Water Act, the Toxic Substances Control Act, Federal Insecticide, Fungicide, and Rodenticide Act, the Clean Air Act, and the Clean Water Act.

### Program Management

Army Major Commands (MACOMs) are responsible for compliance-related cleanup at special installations under their command. Day-to-day management may be conducted by a Major Subordinate Command (MSC) or through a Program Executive Officer (PEO). MSCs and PEOs, as appropriate, plan, program, budget, and execute compliance-related cleanup at special installations.

### Investment and Progress

Investment in compliance-related cleanup was highly decentralized and past investments were not centrally reported. Future requirements looked at the next 5-6 years, but not necessarily through site closure. The Federal Financial Management Improvement Act (FFMIA) created financial liability reporting requirements for all cleanup activities through site closure. The Army developed the Army Environmental Database for Compliance-related Cleanup (AEDB-CC) as the database of record for compliance-related cleanup and began populating the database in the fall of 2004. The AEDB-CC will enable accurate reporting of environmental investments and liabilities as well as progress toward cleanup of compliance-related contamination.

The Army will conduct semi-annual program reviews of cleanup progress against established targets, and periodic reviews of sites where contamination remains in place.

## Mission Statement for Special Installations Compliance-Related Cleanup (Non-DERP)

The cleanup mission of Army special installations compliance-related cleanup is to perform appropriate, cost-effective cleanup to provide property that is safe for Army

use, will sustain operations and training, and is protective of human health and the environment.

<b>Special Installations</b>		
<u>Installation Name</u>	<u>MACOM/MSC</u>	<u>Funding</u>
Umatilla Chemical Depot	AMC/CMA	OMA Chem Demil
Deseret Chemical Depot	AMC/CMA	OMA Chem Demil
Newport Chemical Depot	AMC/CMA	OMA Chem Demil
Pueblo Chemical Depot	AMC/CMA	OMA Chem Demil
Hawthorne Army Depot	AMC/JMC	Various
Lake City Army Ammunition Plant (AAP)	AMC/JMC	PAA
Lone Star AAP	AMC/JMC	PAA
Louisiana AAP	AMC/JMC	PAA
Milan AAP	AMC/JMC	PAA
Mississippi AAP	AMC/JMC	PAA
Radford AAP	AMC/JMC	PAA
Riverbank AAP	AMC/JMC	PAA
Scranton AAP	AMC/JMC	PAA
Holston AAP	AMC/JMC	PAA
Iowa AAP	AMC/JMC	PAA
Kansas AAP	AMC/JMC	PAA
Lima Army Tank Plant	AMC/AMCOM/DCMA	PA – WTCV
Kwajalein	SMDC	RDTE
Letterkenny Army Depot	AMC/AMCOM	AWCF
McAlester AAP	AMC/JMC	AWCF
Rock Island Arsenal	AMC/IMA	AWCF
Sierra Army Depot	AMC/TACOM	AWCF
Tooele Army Depot	AMC/JMC	AWCF
Watervliet Arsenal	AMC/TACOM	AWCF
Pine Bluff Arsenal	AMC/TACOM	AWCF
Anniston Army Depot	AMC/TACOM	AWCF
Red River Army Depot	AMC/TACOM	AWCF
Tobyhanna Army Depot	AMC/CECOM	AWCF
Blue Grass Army Depot	AMC/JMC	AWCF
Sunny Point	SDDC	TWCF
Fort Detrick	MEDCOM	DHP
Walter Reed Army Medical Center	MEDCOM	DHP
Concord (Tenant on Navy Facility)	SDDC	OMA
Crane Ammunition Activity	AMC/JMC	AWCF
Corpus Christi Army Depot	AMC/AMCOM	AWCF
Raven Rock Mountain Complex	MDW	PRMRF

## **Objectives, Targets, and Success Indicators for Army Special Installations Compliance-Related Cleanup (Non-DERP):**

Objectives, targets and success indicators are formatted as follows:

1. Objective.
  - 1.1. Target(s) for this objective.
    - 1.1.1. Success indicator(s) for this target.

1. Ensure prompt action to address imminent and substantial threats to human health, safety, and the environment.
  - 1.1. Protect workers, the public, and the environment as hazards are identified.
    - 1.1.1. Appropriate notification(s) made to command, regulators and public in accordance with established plans.
  - 1.2. Provide advice and expertise to operational commanders and program executive officers, as required, to respond to and minimize imminent and substantial threats to human health, safety, and the environment.
    - 1.2.1. Emergency Response Plans result in minimal impacts to human health, safety, and the environment.
  - 1.3. Where applicable, practice pollution prevention to ensure current operations and cleanups create no new threats to human health and the environment.
2. Conduct appropriate, cost-effective efforts to identify, evaluate, and, where necessary to protect public safety or human health and the environment, conduct response actions to address contamination resulting from DOD activities. Maintain relevant cleanup information in a permanent document repository.
  - 2.1. Maintain an inventory of contaminated sites and incorporate newly identified sites into AEDB-CC; update the database semiannually.
    - 2.1.1. Newly identified sites entered in database prior to semi-annual data call.
  - 2.2. Maintain a permanent document repository of cleanup information, regardless of funding source, so that cleanup information can be retrieved at any date in the future.
    - 2.2.1. Comprehensive permanent document repository that reflects all environmental cleanup at special installations that is up to date.
  - 2.3. Remain cognizant of Army efforts to establish procedures and standardized data to centrally track and manage land use controls created as part of a cleanup program response action.
    - 2.3.1. Information concerning land use controls is transmitted to the central database within 60 days of receipt.
  - 2.4. For each site, obtain geospatial coordinates at a scale commensurate with the scope of the project and send to the US Army Installation Geospatial Information and Services Program office. Follow the guidance in DAIM-MD (AR 210-20) Memorandum dated 16 October 2001, Subject: Data Standards for Computer Aided Drafting and Design (CADD), Geographic Information System (GIS) and Related Technologies.
    - 2.4.1. Environmental cleanup liability information is identified and available for linking with installation real property inventory.

- 2.5. For each site, ensure that management procedures for accountability are identified and in place for forecasting and attaining milestones toward reaching RIP/RC.
  - 2.5.1. Program managers have procedures in place including periodic reviews with supervisory and quality control reviewers to identify and resolve issues that may impede progress.
  - 2.5.2. Supervisory reviewers are being held accountable for the success of their subordinates in actively identifying and effectively resolving issues that could hinder reaching RIP/RC targets.
  - 2.5.3. An organization and an individual to be held accountable (via performance appraisals or other means) are identified for each site.
3. Comply with statutes, regulations, Executive Orders, and other external requirements governing cleanup.
  - 3.1. Anticipate and promptly achieve compliance with new or revised enforceable requirements.
    - 3.1.1. No fines or penalties.
  - 3.2. Use the installation/program office's mission-focused EMS to continually improve performance of the compliance-related cleanup program.
    - 3.2.1. Cleanup considerations are included in installation/program office EMS implementation plans at installations with cleanup activities.
  - 3.3. Identify potential program impacts, including funding requirements and delays to meeting established goals, when chemicals of emerging concern are indicated, such as perchlorate, for inclusion in the Army PPBES process.
    - 3.3.1. MACOM and DAIM(EDC) notified within three months of identifying potential impacts.
  - 3.4. Identify program impacts to PEO programs of complying versus not complying with environmental cleanup requirements and the associated risks thereof.
    - 3.4.1. Environmental annex of PMP describes associated risks and provides justification for compliance-related cleanup decisions.
4. Ensure that Army regulations, policies, and guidance are developed within the framework of the Army Environmental Cleanup Strategy.
  - 4.1. Recommend changes, as required, to appropriate Army Regulations, policies, and guidance.
  - 4.2. Incorporate appropriate policy and guidance into regulations and guidance documents within 180 days of policy issuance.
    - 4.2.1. Specific performance metrics and the program management approach for accomplishing compliance-related cleanup are developed and issued by the PEO or MSC.

5. Plan, program, budget, and execute cleanup in accordance with DOD and Army directives and guidance using validated, auditable, and documented site-level data.
  - 5.1. Execute appropriations to meet DOD obligation and expense objectives.
  - 5.2. MACOM/MSC or PEO, as appropriate, establishes funding guidance for compliance-related cleanup.
    - 5.2.1. Guidance provided to the field one quarter prior to AEDB-CC submission.
  - 5.3. Develop and update annually a CC Installation Action Plan (IAP) and where appropriate, conduct action plan workshops.
    - 5.3.1. IAP workshops conducted at appropriate Army installations.
    - 5.3.2. Cleanup program exit strategy in all IAPs.
  - 5.4. Continue, as required, to implement standardized processes and procedures for introducing rigor, responsibility and accountability in management of compliance-related cleanups.
    - 5.4.1. RACER estimates are used for developing cost estimates where more accurate engineering cost estimates from an RI/FS may not exist.
    - 5.4.2. Documentation supporting the cost estimate is retained for future audit.
  - 5.5. Achieve Federal Financial Management Improvement Act (FFMIA) compliance by FY10.
    - 5.5.1. Receive qualified audit opinion by end of FY07.
    - 5.5.2. Receive unqualified audit opinion by end of FY10.
    - 5.5.3. Financial management information collected and maintained in an FFMIA-compliant single database of record.
6. Seek regional environmental office assistance, as appropriate, with federal, tribal, state, local, territorial, or host-nation authorities.
  - 6.1. Establish or participate in forums such as EPA/state partnering sessions, typically sponsored by the DOD regional environmental offices in each EPA region.
    - 6.1.1. Regional environmental offices are aware of compliance-related cleanup issues at special installations and assisting to resolve as appropriate.
7. Support public stakeholder participation in the cleanup process, as appropriate, and make site-level cleanup information available to the public.
  - 7.1. Establish and maintain an information repository of cleanup information at installations so that cleanup information is available to the public.
    - 7.1.1. An administrative record and information repository available at a single location on the installation.

8. Support the development and use of cost-effective cleanup approaches and technologies to improve program efficiency.
  - 8.1. Consider performance-based contracting and other approaches as appropriate for cleanup projects.
9. Perform semi-annual program management reviews of cleanup progress against established targets, and periodic reviews of sites where contamination remains in place.
  - 9.1. Develop the schedule for the mid-year and year-end reviews NLT 31 December of each year.
    - 9.1.1. Meetings occur IAW the established schedule.
  - 9.2. Ensure the appropriate program managers present success indicators identified in the strategic plan as part of the semi-annual review.
    - 9.2.1. Timelines and responsible respondents are tasked as part of the review for identified deficiencies. Required follow-ups are incorporated into the next scheduled review.

## **Reporting Mechanisms**

In the fall of 2004, the Army began using the AEDB-CC to gather requirements and report financial liability. The Army previously used the Environmental Program Requirements (EPR) reporting system to report requirements for compliance-related cleanup requirements.

## **Management Reviews**

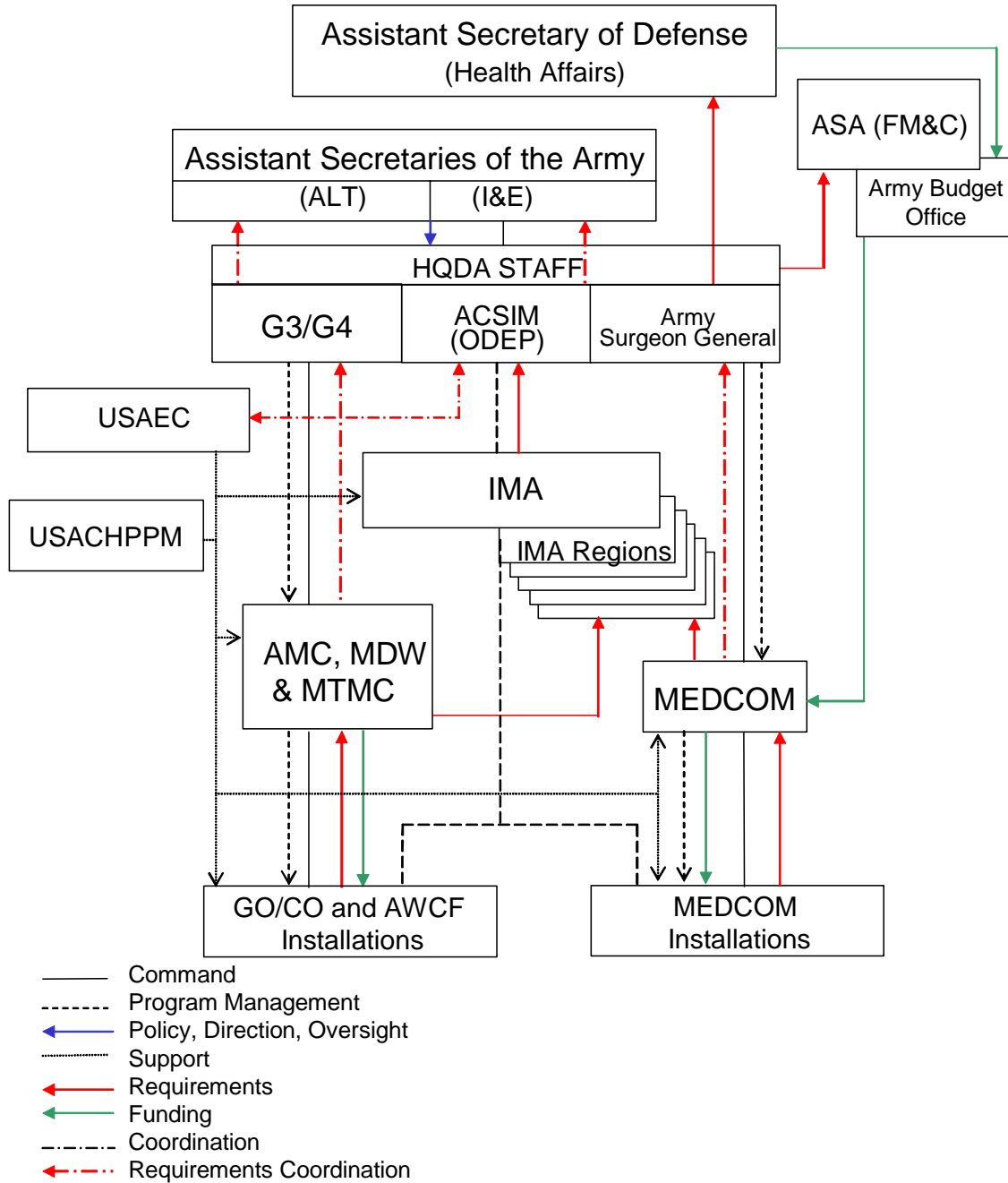
Management reviews are conducted semi-annually for compliance-related cleanup programs. The management review at special installations is separate from the reviews conducted for the IMA and NGB, and the process continues to evolve.

The framework for ODASA(ESOH) management review is this strategic plan and the compliance-related cleanup objectives and targets addressed herein. Program managers, command representatives, and the ODEP staff participate in the management review. Outcomes from the management review are considered and necessary adjustments are made for continual improvement of the environmental cleanup strategy and this strategic plan.



Program Build and Execution Chart

# Special Installations Compliance-Related Cleanup (non-DERP)



## Army Remediation Overseas

### Background

The Army operates numerous installations outside of the United States, its territories, or possessions (hereafter overseas) in support of national security interests. The Army's operations at such facilities have the potential to affect the environment of the host nation (HN), as well as the health and safety of soldiers and civilian personnel. Demonstrating environmental stewardship within host countries is a crucial component to the Army's ability to ensure continued access to overseas installations and facilities in support of US national security interests. Environmental management responsibilities at overseas Army installations are a complex composite of provisions in US laws, Executive Orders (EO), and DOD policies that are specifically applicable to federal facilities overseas, combined with the requirements, flexibilities and latitude of our stationing overseas provided by international agreements. A clear understanding of environmental policies applicable overseas is crucial to ensuring a consistent strategy for management of remediation at Army overseas locations.

Federal legislation generally applies only within the territorial jurisdiction of the US, unless there is specific language that provides a clear intent to extend coverage beyond areas over which the US has sovereignty. Additionally, some EOs (e.g., EO 12088, EO 12114) are written specifically to ensure that federal facilities overseas comply with or address HN environmental considerations appropriately. There are no US laws regarding remediation or environmental contamination cleanup that have extraterritorial applicability. However, the Department of Defense has taken discrete measures to develop and implement an overseas "cleanup" policy. That policy, which is formally promulgated in DOD Instruction (DODI) 4715.8, "Environmental Remediation for DOD Activities Overseas", February 1998, applies to open installations as well as installations designated for return to the HN.

### Program Drivers

There are numerous drivers for overseas environmental management and remediation. DODI 4715.8 provides the fundamental policy "driver" applicable to remediation at Army installations overseas, and thus provides the basis for the Army Environmental Cleanup Strategy (AECS) for remediation at Army installations and activities overseas. Some of the drivers may be manifested in international agreements, such as a Status of Forces Agreement (SOFA). The overseas remediation program differs significantly from the cleanup program conducted in the United States, which is driven by statutory requirements. Thus, the objectives, targets and success indicators for overseas sites are tailored accordingly, as the Army Compliance-Related Cleanup (Non-DERP) metrics are not necessarily applicable. This strategy document does not supersede or amend any existing remediation policies for environmental contamination overseas. Additionally, neither this strategy, nor the DODI 4715.8 policy and procedures therein, apply to contingency operations, deployments, operations connected with actual or threatened hostilities (e.g., Afghanistan or Iraq), relief operations or peacekeeping missions.

### Program Management

The IMA is the program manager responsible for planning, budgeting, and executing compliance-related cleanup at overseas installations. IMA and overseas installations receive guidance from the component commander and the DOD Environmental Executive Agent.

### Investment and Progress

Investment in compliance-related cleanup was highly decentralized and past investments were not centrally reported. Future requirements looked at the next 5-6 years, but not necessarily through site closure. The Army developed the Army Environmental Database for Compliance-related Cleanup (AEDB-CC) as the database of record for compliance-related cleanup and began populating the database in FY04. The AEDB-CC will enable accurate reporting of environmental investments and liabilities as well as progress toward cleanup of compliance-related contamination.

The Army will conduct semi-annual program management reviews of cleanup progress against established targets, and periodic reviews of sites where contamination remains in place.

## Mission Statement for Army Remediation Overseas

The primary cleanup mission at overseas locations is to remediate imminent and substantial endangerments to human health and safety due to environmental contamination caused by past Army operations that are located on or is emanating from an Army installation or facility. Additional mission elements to consider are retaining mission/operational capability, maintaining installation access, protection of human health, and applicable international agreements.

## Objectives, Targets, and Success Indicators for Army Remediation Overseas:

Objectives, targets and success indicators are formatted as follows:

1. Objective.
  - 1.1. Target(s) for this objective.
    - 1.1.1. Success indicator(s) for this target.

1. Protect the health and safety of military, civilian and local national personnel.
  - 1.1. Protect workers, the public, and maintain operations as hazards are identified.
    - 1.1.1. Exposure to contaminated sites is limited until remediation measures are conducted.
  - 1.2. Provide advice and expertise to operational commanders, as required, to respond to and minimize imminent and substantial threats to human health and safety.
    - 1.2.1. Emergency Response Plans result in minimal impacts to human health, safety, and the environment.
    - 1.2.2. Operational entities are informed of activities that may result in contamination, and are provided possible alternatives.
  - 1.3. Where applicable, practice pollution prevention to ensure current operations and ongoing cleanup activities create no new threats to human health and the environment.
2. Conduct remediation in accordance with policy and procedures prescribed in DODI 4715.8; specifically included are:
  - Remediation of known imminent and substantial endangerment to human health and safety;
  - Remedial measures required in order to maintain operational capabilities;
  - Protection of human health and safety; and,
  - Consideration of applicable international agreements.

- 2.1. Maintain an inventory of contaminated sites; update the database semiannually.
  - 2.1.1. Newly identified sites in database prior to semi-annual data call.
- 2.2. Continue to maintain a permanent document repository for cleanup information, regardless of funding source, so that cleanup information can be retrieved at any date in the future.
  - 2.2.1. Comprehensive, up to date permanent document repository that reflects all environmental remediation at an overseas installation; the 40% of installations that will be complete at end of FY06 are identified; the 70% of installations that will be complete at end of FY07 are identified; 100% of installations complete at end of FY08; new documents submitted within 60 days of receipt.
- 2.3. Develop a standard process for approval of cleanup requirements that includes approval by the combatant commander and consultation with the DOD Executive Agent.
  - 2.3.1. Full compliance with country-specific remediation policies as the DOD designated Executive Agent establishes policies.
- 2.4. Consider mission capabilities and objectives as an integral component of the decision-making process when determining whether the ability to “maintain operations” is sufficient to warrant cleanup expenditures (in consonance with DODI 4715.8).
  - 2.4.1. Contaminated sites do not impair operational / mission needs.
  - 2.4.2. Unimpaired operations and continued access to installations.
- 2.5. Continue, as required, to implement standardized processes and procedures for introducing rigor, responsibility and accountability in management of cleanup programs.
  - 2.5.1. RACER estimates are used for developing cost estimates where more accurate engineering cost estimates from an RI/FS may not exist.
- 2.6. For each site, identify an organization and an individual to be held accountable (via performance appraisals or other means) for forecasting and attaining milestones toward reaching RIP/RC.
  - 2.6.1. Program managers maintaining a list of identified individuals and conducting one-on-one periodic reviews with the individuals and their supervisors to identify and resolve issues that may impede progress.
  - 2.6.2. Supervisors are being held accountable for the success of their subordinates in actively identifying and effectively resolving issues that could hinder reaching RIP/RC targets.
3. Support overseas restationing.
  - 3.1. Determine cleanup requirements at closing or realigning installations within 3 months of decision.

- 3.2. Determine funding allocations for closing or realigning installations within 4 months of decision.
- 3.3. Reprogram funds as required.
- 3.4. Discontinue (do not delete) projects for closing installations in the AEDB(CC) database.
4. Plan, program, and execute funds for identified remediation requirements at overseas locations.
  - 4.1. Use AEDB-CC to plan and program remediation projects, developing a cost-to-complete for each project.
    - 4.1.1. Requirements for all identified sites are programmed in AEDB-CC.
    - 4.1.2. Successful quality assurance review by USAEC and validation of projects by HQDA/ODEP.
  - 4.2. Ensure that 100% of all overseas remediation sites comply with funding eligibility parameters established in DODI 4715.8 and are programmed.
    - 4.2.1. Funding requirements are adequately programmed in the AEDB-CC through the POM years.
    - 4.2.2. Decreases in programmed funding for baseline sites in the outyears.
  - 4.3. Implement verifiable, credible and auditable cost estimates for overseas remediation projects.
    - 4.3.1. RACER or another verified and validated cost estimating system used to develop cost estimates.
  - 4.4. Monitor projects to ensure that Army funds are spent for projects that meet the criteria established in, or are otherwise eligible for funding in accordance with DODI 4715.8.
    - 4.4.1. Remediation projects in the baseline profile are steadily being completed.
    - 4.4.2. Newly identified projects are higher in relative risk or another parameter to justify funding priority ahead of remediation projects in the baseline profile.
5. Demonstrate cooperation and coordination with host nation authorities, and ensure use of the claims process where appropriate.
  - 5.1. Reduce, to the extent practical, projects programmed for Army environmental funding in AEDB-CC that are eligible for funding via the "Claims" process (e.g., by the host nation/third parties).
    - 5.1.1. Reduction of sites/projects programmed for Army environmental funding in AEDB-CC due to funding via the Claims process.
  - 5.2. Discontinue (do not delete) projects in AEDB-CC that are funded through the claims process.

- 5.2.1. Progress is tracked in AEDB-CC and claims funds are identified as the source of project funding.

## **Reporting Mechanisms**

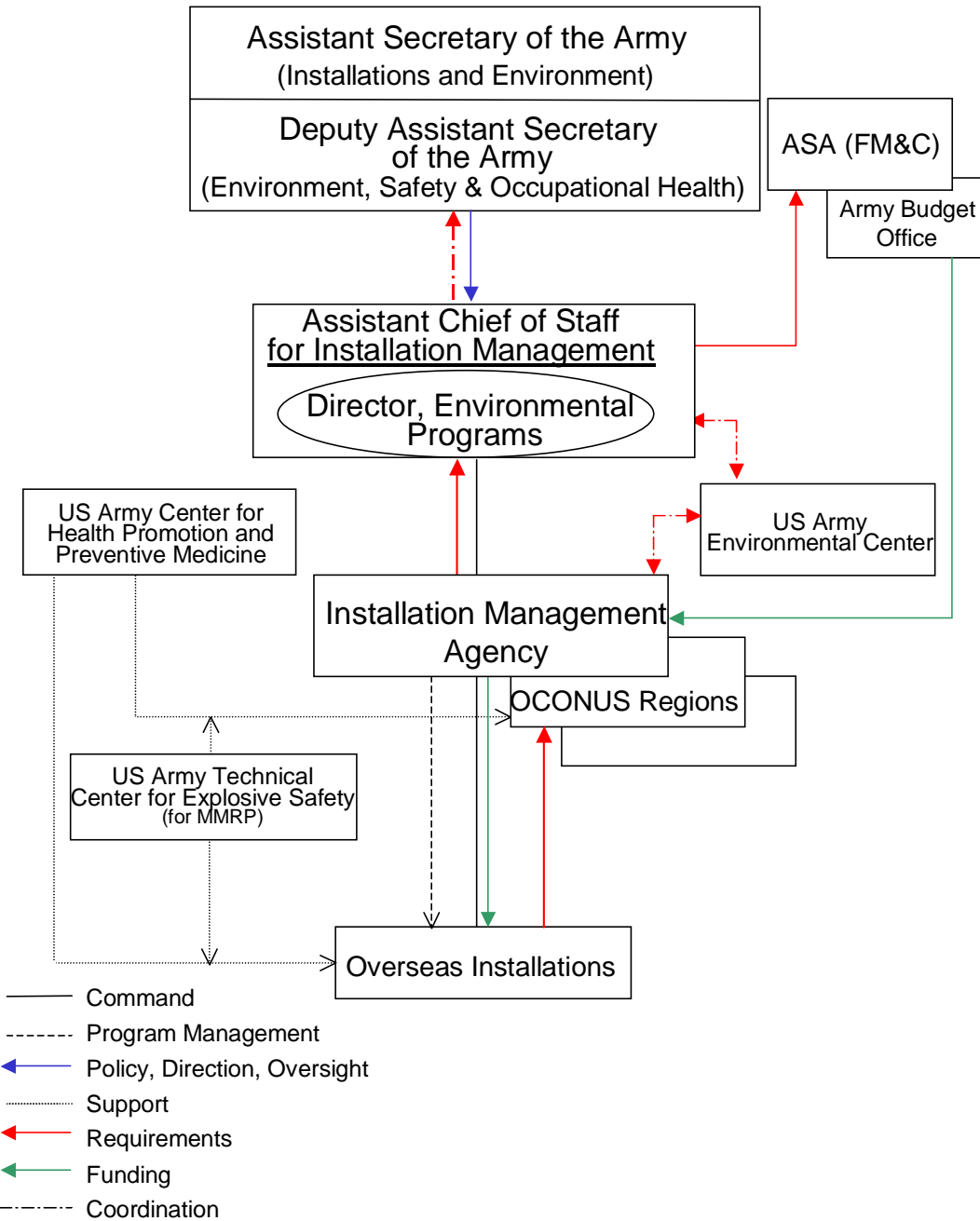
Beginning in the fall of 2004, the Army began using the AEDB-CC to gather requirements and report financial liability. The Army previously used the Environmental Program Requirements (EPR) reporting system to report requirements for compliance related cleanup requirements.

## **Management Review**

The Army remediation overseas program is included in the IMA's semi-annual compliance related cleanup management review. The framework for management review is this strategic plan and the program management plans that the IMA develops annually. Additionally, installation action plan workshops address CC requirements. Army IMA regional offices are responsible for quality control of all remediation projects in AEDB-CC. The Army Environmental Center also participates to help ensure adherence to DODI 4715.8, provide quality assurance and resolve any discrepancies as appropriate.

Program Build and Execution Chart

# Army Remediation Overseas



## Acronyms

AAP	Army Ammunition Plant
ACSIM	Assistant Chief of Staff, Installation Management
AECS	Army Environmental Cleanup Strategy
AEDB	Army Environmental Database
AEDB-R	Army Environmental Database, Restoration
AEDB-CC	Army Environmental Database, Compliance-related Cleanup
AFDE	Assessment and Findings for Determination of Eligibility
AMC	US Army Material Command
AMCOM	Aviation Missile Command
AR	Army Regulation
ARAR	Applicable or Relevant and Appropriate
ARC	Annual Report to Congress
ARNG	Army National Guard
ASA (ALT)	Assistant Secretary of the Army for Acquisition, Logistics and Technology
ASA (FM&C)	Assistant Secretary of the Army, Financial Management and Comptroller
ASA (I&E)	Assistant Secretary of the Army for Installations and the Environment
ASTM	American Society for Testing and Materials
ATSDR	Agency for Toxic Substances and Disease Registry
AWCF	Army Working Capital Fund
BASOPS	Base Operations
BCP	BRAC Cleanup Plan
BD/DR	Building Demolition/Debris Removal
BEC	BRAC Environmental Coordinator
BIAP	BRAC Installation Action Plans
BRAC	Base Realignment and Closure
BRACD	BRAC Division
CC	Compliance-related Cleanup
CECOM	Communications and Electronics Command
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERFA	Community Environmental Response Facilitation Act
CFR	Code of Federal Regulations
CMA	Chemicals Management Agency
CON/HTRW	Containerized Hazardous, Toxic, and Radioactive Waste
CONUS	Continental United States
CTT	Closed, Transferred, and Transferring (ranges)
CWM	Chemical Warfare Material
CY	Calendar Year
DAIM-BD	Army BRAC Office (ACSIM)
DAIM-ED	Army Environmental Office (ACSIM)
DAIM-EDC	Army Cleanup Office (ACSIM)
DASA	Deputy Assistant Secretary of the Army
DCMA	Defense Contract Management Agency
DD	Decision Document



DERP	Defense Environmental Restoration Program
DFAS	Defense Financial Accounting System
DLA	Defense Logistics Agency
DMM	Discarded Military Munitions
DOD	Department of Defense
DODD	DOD Directive
DODI	DOD Instruction
DOJ	Department of Justice
DSMOA	Defense State Memorandum of Agreement
EBS	Environmental Baseline Survey
EE/CA	Engineering Evaluation/Cost Analysis
EMS	Environmental Management System
EO	Executive Order
EOY	End of Year
EPA	US Environmental Protection Agency
EPR	Environmental Program Requirements
ER	Engineer Regulation
ER,A	Environmental Restoration [account], Army
ER-FUDS	Environmental Restoration [account], Formerly Used Defense Sites
ESCA	Environmental Services Cooperative Agreement
ESOH	Environment, Safety, and Occupational Health
FFMIA	Federal Financial Management Improvement Act
FIIP	FUDS Information Improvement Plan
FMR	Financial Management Regulation
FO	Field Office
FOSET	Finding of Suitability for Early Transfer
FOST	Finding of Suitability to Transfer
FUDS	Formerly Used Defense Site
FUDSMIS	FUDS Management Information System
FY	Fiscal Year
GIS	Geographic Information System
GO/CO	Government Owned/Contractor Operated
GPRA	Government Performance and Results Act
GSA	General Services Administration
GWETER	Groundwater Extraction and Treatment Effectiveness Review
HN	Host Nation
HQDA	Headquarters, Department of the Army
HTRW	Hazardous, Toxic, and Radioactive Waste
I&E	Installations and Environment
IAP	Installation Action Plan
IAW	In Accordance With
IMA	Installation Management Agency
IPR	In-Progress Review
IRA	Interim Remedial Action
IRP	Installation Restoration Program
ISO	International Organization for Standardization

JMC	Joint Munitions Command
LTM	Long Term Management
LUC	Land Use Control(s)
MACOM	Army Major Command
MAP	Management Action Plan
MC	Munitions Constituents
MCL	Maximum Contaminant Level
MDW	US Army Military District of Washington
MEC	Munitions and Explosives of Concern
MEDCOM	US Army Medical Command
MILCON	Military Construction
MMRP	Military Munitions Response Program
MSC	Major Subordinate Command
NAS	National Academies of Science
NCP	National Oil and Hazardous Substances Contingency Plan
NDAI	No DOD Action Indicated
NGB	National Guard Bureau
NPL	National Priorities List
NRI	Natural Resource Injury
ODASA	Office of the Deputy Assistant Secretary of the Army
ODEP	Office of the Director, Environmental Programs
OE	Ordnance and Explosives
OEW	Ordnance and Explosives Waste
OMA	Operations and Maintenance, Army
OMNG	Operations and Maintenance, National Guard
OSD	Office of the Secretary of Defense
PA	Preliminary Assessment
PBC	Performance-Based Contracting
PEO	Program Executive Office
PM	Program Manager
PMP	Program Management Plan
POM	Program Objective Memorandum
PPBES	Planning, Programming, Budgeting and Execution System
PPI	POM Preparation Instructions
PRMRF	Pentagon Reservation Maintenance Revolving Fund
PRP	Potentially Responsible Party
QA/QC	Quality Assurance/Quality Control
RA	Remedial Action
RAB	Restoration Advisory Board
RAC	Risk Assessment Code
RA(C)	Remedial Action Construction
RA(O)	Remedial Action Operations
RACER	Remedial Action Cost Engineering and Requirements
RC	Response Complete
RD	Remedial Design
RCRA	Resource Conservation and Recovery Act

RCWM	Recovered Chemical Warfare Material
RI/FS	Remedial Investigation/Feasibility Study
RIP	Remedy in Place
ROD	Record of Decision
RRSE	Relative Risk Site Evaluation
SI	Site Inspection
SDDC	US Army Surface Deployment and Distribution Command
TACOM	Tank-Automotive and Armaments Command
TCE	Trichloroethylene
TPS	Third Party Site
USACE	US Army Corps of Engineers
USACHPPM	US Army Center for Health Promotion and Preventive Medicine
USAEC	US Army Environmental Center
USC	United States Code
UST	Underground Storage Tank
UXO	Unexploded Ordnance

## Glossary

**Army Environmental Database (AEDB)** – A web-based automated information management system (which is operated and maintained by the U.S. Army Environmental Center) for integrating the Army's cleanup, conservation, compliance, and pollution prevention environmental data.

**Action Memorandum** – A memorandum that documents a CERCLA removal action decision. The responsible party prepares it subsequent to an Engineering Evaluation/Cost Analysis (EE/CA). For time critical removal actions, both the EE/CA and Action Memorandum may be prepared after the fact.

**Assessment and Findings for Determination of Eligibility (AFDE)** – Assessment conducted to identify the program responsible for funding. An AFDE is not part of a DERP or CC project.

**BRAC Cleanup Plan** – An annual plan that documents the status of and plans for cleanup activities at BRAC installations.

**Decision Document** – Documentation of removal or interim remedial action (IRA) and remedial action (RA) decisions undertaken in accordance with CERCLA and the NCP at non-National Priorities List (NPL) installations, and sites at NPL installations at which removal or IRA decisions have been made.

**Defense Site** – Per 10 U.S.C. 2710(e)(1), locations that are or were owned by, leased to, or otherwise possessed or used by the Department of Defense. The term does not include any operational range, operating storage or manufacturing facility, or facility that is or was permitted for the treatment or disposal of military munitions.

**Environmental Program Requirements (EPR)** – A system formerly used for annual reporting of compliance-related cleanup requirements.

**Excess Installation** – A group of former installations, not covered by BRAC legislation, which the Army has identified as excess to operational needs. The BRAC Division of the Office of the Assistant Chief of Staff for Installation Management (ACSIM) has been assigned responsibility for property transfer at Excess installations.

**Initial/Emergency Response Action** – Action taken immediately after occurrence or discovery of a release to prevent further migration. Initial/emergency response actions include, but are not limited to, preliminary investigations to determine the initial extent of contaminant migration; physical containment, removal, and/or excavation of excess contaminant and contaminated soil or material; over packing in drums (if needed); transport for disposal; and disposal at an approved disposal facility. An Initial/Emergency Response Action is not a CERCLA Preliminary Assessment/Site Investigation or a RCRA Facility Assessment.

**Installation Action Plan** – An annual plan that outlines the status of and plans for restoration activities at active and excess installations.

**ISO 14001** – An international standard that provides a framework for an overall, strategic approach to an organization's environmental policy, plans and actions.

**Land Use Controls (LUCs)** – Physical, legal, or administrative mechanisms that restrict the use of or limit access to contaminated property in order to reduce risk to human health and the environment.

**Long-Term Management (LTM)** – Term used for environmental monitoring, review of site conditions, and/or maintenance of a remedial action to ensure continued protection as designed once a site achieves Response Complete. Examples of LTM include landfill cap maintenance, leachate disposal, fence monitoring and repair, five-year review execution, and land use control enforcement actions.

**Management Action Plan** – An annual plan that outlines the status of and plans for restoration activities at active and excess installations.

**Munitions and Explosives of Concern (MEC)** – The term, which distinguishes specific categories of military munitions that may pose unique explosives safety risks, means (1) Unexploded Ordnance (UXO) as defined in 10 U.S.C. 101(e)(5)(A)-(C); (2) discarded military munitions (DMM), as defined in 10 U.S.C. 2710(e)(2); or (3) munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. 2710(e)(3), present in high enough concentrations to pose an explosive hazard.

**Military Construction** – The term military construction (MILCON) includes any construction, development, conversion, or extension of any kind carried out with respect to a military installation, (10 USC 2801).

**Munitions Response** – Response actions (removal or remedial) to investigate and address explosive hazards and threats to human health and the environment presented by unexploded ordnance or discarded military munitions, or munitions constituents.

**Non-Federal, Federally Supported** – A term that describes Non-Federally owned installations, facilities, activities, and properties that currently receive or have received Federally appropriated funds or are used to support the federal missions of the Army National Guard. Such missions include but are not limited to, the training of troops, the firing of military munitions, and any other operation required for maintaining their status as a reserve component of the United States military.

**Record of Decision** – A CERCLA document that outlines the selected remedy, the alternatives considered when selecting the remedy, the facts relating to cleanup, and the laws or regulations that may govern cleanup at both NPL and non-NPL remediation sites. The Record of Decision also includes a Responsive Summary or responses to public comments on the alternatives and proposed remedy.

**Remedy or Remedial Action** – Those actions consistent with permanent remedy taken instead of or in addition to removal actions in the event of a release or threatened release of a hazardous substance into the environment, and to prevent or minimize the release of hazardous substances so that they do not migrate and pose an unacceptable risk to present or future public health, welfare or the environment.

**Removal** – The cleanup or removal of released hazardous substances from the environment. The requirements for removal actions are addressed in 40 CFR §§300.410 and 300.415. The three types of removals are emergency, time-critical, and non time-critical removals.

**Response Actions** – Response actions (emergency, removal, or remedial) to investigate and address hazards and threats to human health and the environment.

**Restoration Advisory Board** – A forum composed of representatives of the Department of Defense (DOD), the U.S. Environmental Protection Agency (EPA), state and local governments, tribal governments, and the affected community. RAB members provide their individual advice to the Installation Commander or District Engineer concerning environmental cleanup at military installations or FUDS. The RAB should reflect the diverse makeup of the community, give all stakeholders the opportunity to participate in the cleanup process, monitor cleanup progress, and provide the opportunity to make the community views known to the decision-makers.

**Site (as defined in the Restoration Management Information System Data Element Dictionary for a SITE\_ID)** – A unique name given to a distinct area of an installation or property containing one or more releases or threatened releases of hazardous substances treated as a discreet entity or consolidated grouping for response purposes. Includes any building, structure, impoundment, landfill, storage container, or other site or area where a hazardous substance was or has come to be located, including formerly used defense sites eligible for building demolition/debris removal. Installations, properties and ranges may have more than one site.

**Special Installation** – An installation that primarily uses funds other than operation and maintenance funds (i.e., mission funds) to conduct traditional garrison operations in support of its primary mission. Special installations are generally very small, mostly industrial, and typically do not have a stand-alone installation staff. Command, control, manpower, and funding remain with the Army Major Commands, while traditional base operations support (BOS) oversight is provided by the Installation Management Agency. Several mission fund types are used in the operation of these installations, including: Army Working Capital Funds (AWCF); Transportation Working Capital Funds (TWCF); Chemical Program funds; Defense Health Program (DHP) funds; Procurement Army Ammunition (PAA) funds; and Research, Development, Test, & Evaluation (RDT&E) funds.

**Third Party Site (TPS)** – A facility or site that is not currently owned by, leased to, or otherwise possessed by the United States and under the jurisdiction of the Secretary of Defense or was not previously under the jurisdiction of the Secretary and owned by, leased to, or otherwise possessed by the United States, and where the Department of Defense is a potentially responsible party under CERCLA.

## OUTLINE FOR PROGRAM MANAGEMENT PLAN WITH SUPPLEMENTARY GUIDANCE

[This is a generic outline for a program management plan (PMP); each program manager should supplement/augment the plan with additional information as required.]

### **Cover Sheet**

- Executive Summary (with signatures of program manager and organization principal/deputy).
  - o Signatures indicate that the plan is viable and every attempt will be made to adhere to the plan.
  - o ODEP understands that things happen during the course of a year and plans must sometimes change.

### **Introduction**

- Purpose and scope of the program.
- Background.
- History.
  - o One to two pages to set the stage for the reader. The PMP is a stand-alone document.

### **Program Implementation**

- What, why, who, where, when for the program.
  - o Describe the roles and responsibilities of the various principals/players in the cleanup program area.
  - o Describe how requirements are identified and prioritized.
  - o Describe what you do to “manage” your program.
  - o What sites or issues are your outliers?
  - o Which sites/installations miss established targets?
    - What are you doing to keep track of those sites?
    - Are the outliers on the alternative schedule you have established to achieve RIP/RC?

[For dedicated programs (currently only Massachusetts Military Reservation), a separate program management plan must be developed. Any installation with costs exceeding \$5 million in one year is subject to becoming a designated program.]

- How/when the objective met.
  - o Describe how the cleanup objective will be met and when it will be met, with key milestones along the way.
  - o Describe the state of the environment at the end of the cleanup program.
    - Using the Army’s risk-based cleanup approach, contamination will remain in place at which installations, requiring long-term management?



- o The Army strategy for funding MMRP is to complete the IRP and migrate funds within the Army DERP.
  - How long will your IRP need LTM funds?
- o A pictogram to show when each installation achieves last RIP and ultimately RC and site closeout could summarize this section.
  
- Program management approach.
  - o The Army’s cleanup program is a “managed program” versus a “reactive program” with endless demands from outside the Army.
  - o Describe any initiatives and expected outcomes from those initiatives.
    - For example, a discussion about remedial investigation (RI) as the end point of characterization, leading to a performance-based contract where the contractor and regulator determine the most appropriate course of future action.
  
- Program Resources.
  - o Describe program requirements and resources, using a table format, and discussion to address any differences in requirements and resources, actions to live within a constrained budget and POM, and the risks associated with the constrained program.
  - o Describe (and show) any installation with projected expenditures in the PMP year greater than \$5 million.
  - o Describe where major reductions/increases occurred and any risks for the planned PMP year.
  - o Describe project versus program management costs and discuss steps to control program management costs, especially with respect to duplication of effort (document reviews, etc.).

(\$M)	Thru'03	FY04	Current'05	PMP '06	'07	'08	'09	'10	'11
Requirements		50	48	49	52	52	47	42	35
Program	725	44	45	47	49	51	47	42	35
(Installation x with its own PMP)	(30)	(6)	(6)	(7)	(4)	(2)	(.5)	(.5)	(.5)
(Program Mgt Costs)		(3.8)	(4.5)	(4.7)	(4.9)	(4.9)	(4.5)	(4.1)	(3.5)

**Acquisition Strategy**

- Program execution method/means
  - o Describe which agency(s) will execute the program (Army Contracting Agency or US Army Corps of Engineers, etc.).
  - o For major initiatives such as performance-based contracting, describe (table format is recommended) which installations will be included in meeting program targets for the initiative.

Year	'04	'05	'06	'07
PBC Target	30%	50%	70%	80%
	[List of installations]	[List of installations]	[List of installations]	[List of installations]

**Reporting Mechanisms**

- Use database of record.
  - o Establish phase milestones in IAP and annual work plan and report actual versus planned RIP/RC quarterly.
  - o Include a table with sites and the quarter in which the site is projected to reach RIP/RC.
  
- DFAS for quarterly obligations.
  - o DFAS is the Army’s official holder of obligation data – if the \$\$ are not obligated in DFAS, they are not obligated.
  
- DFAS for annual and past 5 years expenditures.
  - o Most cleanup funds are operations and maintenance funds of one color or another, and therefore subject to annual obligation and expenditure within 5 years.
  - o If obligated funds are not being expended, it means cleanup is not occurring and future years funding is sometimes jeopardized if Congress perceives that excess funds exist.

**Management Review**

- PMP review and approval.
  - o Preparation of the PMP should begin no later than 1 July for the next fiscal year that begins 1 October.
    - Share the draft PMP with the ODEP staff proponent by 1 August.
    - The ODEP staff proponent will provide comments by 10 August, enabling the PM to make final revisions and begin formal staffing by 1 September for principal’s signature
  - o Submit final PMP to ACSIM by 15 September.
  - o ACSIM and ESOH reviews will occur and briefings to ESOH for workplan approval will occur in late September.
  
- Program manager review and oversight consistent with EMS framework.
  - o Describe how often you as program manager conduct reviews and oversight of your program, subjects covered, etc.
  - o Describe how you implement necessary changes.
  
- ACSIM and ASA(ESOH) semi-annual reviews.
  - o ACSIM and ASA(ESOH) perform management reviews of each program area semi-annually.
    - The October/November review typically looks at prior year execution and accomplishment of targets and success indicators.

- The mid-year review in April is typically a quick look at execution to date and a forward look to future requirements and resource issues.

### **Objectives, Targets, and Success Indicators**

Using and expanding upon the information above, describe using bullet statements what you plan to do to achieve the applicable targets and success indicators in the Army Environmental Cleanup Strategic Plan. In conducting your plan, you will help the Army achieve its overarching objectives and attain its vision to be a national leader in cleaning up contaminated land to protect human health and the environment as an integral part of the Army mission.

1. Objective 1.
    - 1.1. Target 1.1.
      - 1.1.1. Success indicator 1.1.1.
        - Plan:
          - o Prompt action to mitigate...
          - o Make necessary changes to...
          - o Achieve...
          - o Etc.
2. Objective 2.
  - 2.1. Target 2.1.
    - 2.1.1. Success indicator 2.1.1.
      - Plan:
        - o Incorporate changes in...
        - o Provide information to...
        - o Achieve...
        - o Etc.
  - 2.2. Target 2.2.
    - 2.2.1. Success indicator 2.2.1.
      - Plan:
        - o Prepare report detailing...
        - o Make necessary changes to...
        - o Achieve...
        - o Etc.
3. Objective 3. Etc., etc.

### **Conclusion**

- Program exit strategy.
  - o In a conclusion statement, describe your plan to complete the cleanup program.

### **Attachments**

1. Budget year work plan with signature page
2. Cost-to-complete projection