

24 DEC 1986

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SUBJECT: Revised Installation Restoration Program (IRP) Management Plan

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SUBJECT: Revised Installation Restoration Program (IRP)
Management Plan

Commander, U.S. Army Industrial Operations Command,
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24 DEC 1996

FOR SEE DISTRIBUTION

1. The revised subject IRP management plan is provided for your use. This management plan supersedes the FY 96 IRP management plan.
2. The POC for this action is Mr. Cyril Onewokae, AMSIO-EQE, DSN 793-1350, E-mail conewoka@ria-emh2.army.mil.

FOR THE COMMANDER:

Encl
as


TONI S. MCNEAL
Acting DCS for Environmental
Management



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY ENVIRONMENTAL CENTER
ABERDEEN PROVING GROUND, MARYLAND 21010-5401



SFIM-AEC-RPM (50-6c)

06 DEC 1996

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Revised Installation Restoration Program (IRP)
Management Plan

1. Reference, memorandum, USAEC, SFIM-AEC-IRP, 8 Feb 95, subject: Revised Installation Restoration Program (IRP) Management Plan.
2. The IRP Management Plan outlines the basic principles of the Army IRP, provides information relevant to the management and execution of the program and outlines roles, responsibilities and procedures.
3. In FY96 several changes to the Army's IRP were implemented. These changes included the devolvement of the Defense Environmental Restoration Account, Army decentralization of funding for the IRP, focus on meeting the goals for cleanup activities in the Defense Planning Guidance, and emphasis on the establishment of Restoration Advisory Boards. The enclosed document updates the February 1995 revised IRP Management Plan (reference).
4. Request that the enclosed guidance receive wide dissemination to those directly involved in the Army's IRP. Comments regarding the IRP Management Plan can be directed to the USAEC point of contact, Ms. Karen Wilson, (410) 671-3240 or DSN 584-3240.

Encl

Richard K. Weiner
RICHARD K. WEINER
Colonel, CM
Commanding

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Management Plan

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Management Plan

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*INSTALLATION RESTORATION PROGRAM
MANAGEMENT PLAN*

*Prepared by the
U.S. Army Environmental Center
December 1996*

*This IRP Management Plan
supersedes
the February 1995
IRP Management Plan*

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Attachment F	Decision Document Outline and Example
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INSTALLATION RESTORATION PROGRAM MANAGEMENT PLAN

PURPOSE

The Installation Restoration Program (IRP) Management Plan provides guidance on the management and execution of the Army's IRP and outlines roles, responsibilities, and procedures. This management plan applies to activities that are located in the states of the U.S., the District of Columbia, and territories of the United States. This document is not applicable to the Base Realignment and Closure (BRAC) program as funded by the Base Closure Account or the Formerly Used Defense Sites (FUDS) restoration program.

BACKGROUND

Defense Environmental Restoration Program

The Defense Environmental Restoration Program (DERP) was formally established by Congress in 1984, Title 10 United States Code (USC) 2701 - 2707 and 2810. The program provides for the cleanup of Department of Defense (DoD) hazardous waste sites consistent with the provisions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR 300) and Executive Order (EO) 12580, Superfund Implementation.

Section 211 of SARA, 10 USC 2701, authorizes the Secretary of Defense to carry out the DERP. For FY97, Congress devolved the DERP, authorizing and appropriating funds for individual transfer accounts for the Army, Navy, Air Force, Defense Agencies, FUDS and Office of the Deputy Under Secretary of Defense for Environmental Security (ODUSD(ES)). The Services program, budget and manage their account with ODUSD (ES) establishing program goals and providing program management oversight. The DERP was previously funded by a DoD transfer account, the Defense Environmental Restoration Account (DERA), established by Section 211 of SARA, 10 USC 2703. The newly established Army transfer account is known as Environmental Restoration, Army (ER,A).

ODUSD(ES) establishes DERP goals for the Services' restoration programs in the Defense Planning Guidance (DPG) and activities eligible for restoration funds are provided by ODUSD (ES) in the DERP Management Guidance. The latest guidance from ODUSD (ES) concerning the DERP is dated 14 Apr 94.

Attachment A of this management plan presents specific activities eligible and not eligible for funds under the DERP.

Installation Restoration Program

The Army's program under the DERP is the IRP. The IRP is a comprehensive program to identify, investigate and clean up contamination at active Army installations. Active installations are real properties within the United States owned by the Army. The IRP focuses on cleanup of contamination associated with past Army activities.

ARMY INSTALLATION RESTORATION PROGRAM OVERVIEW

The objective of the IRP is to clean up contaminated environment from past Army activities with the following goals; (1) to protect the health and safety of installation personnel and the public, and (2) to restore the quality of the environment. Installations perform only essential studies necessary to ascertain the need for remedial action, identify the preferred remedial alternative, and recommend the means for implementation.

The IRP is conducted consistent with the process described in the NCP, 40 CFR parts 300.61 through 300.70, and, *if applicable*, consistent with the substantive requirements of the Resource Conservation and Recovery Act (RCRA) corrective action process. Identification, investigation, and cleanup of Solid Waste Management Units (SWMUs) under the RCRA corrective action process *may be eligible for IRP funds if contamination at the SWMU resulted from past activities and the SWMU was inactive or closed prior to being subjected to RCRA requirements.* The IRP also complies with state, regional, and local requirements applicable to the cleanup of hazardous materials contamination, as well as related site safety.

At each phase of response, appropriate coordination is conducted with federal, state, regional and local regulatory agencies. Interaction between the installation and the regulatory agencies should be frequent. The Defense and State Memorandum of Agreement/Cooperative Agreement Program reimburses State environmental regulatory agencies for technical services provided in support of the Army's IRP. While fostering open communication between the Army and state regulators, this program assists in expediting environmental restoration at Army installations.

Community relations activities are an integral part of the Army's IRP. Installation commanders seek public involvement early in the cleanup process. Unless an emergency situation exists, as defined by the removal action criteria in the NCP, part 300.415(b)(2), the public is afforded an opportunity to review and comment on any proposed remedial action.

The IRP also addresses public health concerns. The Agency for Toxic Substances and Disease Registry (ATSDR) is mandated under CERCLA section 104 (I) and section 2704 to evaluate all federal facilities on or proposed to the U.S. Environmental Protection Agency's (EPA) National Priorities List (NPL) for public health concerns.

Roles and Responsibilities

Overall, the Assistant Secretary of the Army (Installations, Logistics, and Environment) (ASA(IL&E)) through the Deputy Assistant Secretary of the Army (Environment, Safety, and Occupational Health) (DASA(ESOH)) has ultimate responsibility for all Army environmental programs, and overall policy and guidance authority concerning all Army environmental matters.

The Assistant Chief of Staff for Installation Management (ACSIM), manages the Army's environmental program. The Director of Environmental Programs (DEP) and his/her staff support the ACSIM and review and provide recommendations on all submissions and responses directed to the ACSIM concerning environmental policies, planning, programming, budgeting, and oversight of the Army's environmental programs and related matters.

The U.S. Army Environmental Center (USAEC) is a Field Operating Agency (FOA) of the ACSIM and is the Army's program manager for the IRP. As the program manager, USAEC develops the IRP budget, prepares the IRP Work Plan, reports on progress to the ODUSD(ES), develops Army-wide guidance and coordinates program activities and requirements with major Army commands. USAEC oversees the execution of the IRP ensuring quality products.

The major Army commands (MACOMs) and, if applicable, their major subordinate commands (MSCs) are responsible for direction and management of the IRP for installations under their command. The MACOM prioritizes IRP requirements, distributes funds to installations and executors, monitors project execution for obligation and reporting, consolidates and reports technical and financial installation data to the USAEC, and provides technical and financial guidance to all installations under their command.

The *Installation Commander (IC)* is responsible for executing the IRP at his/her installation. Installations are responsible for tasking their IRP executor(s), reporting to their MACOM/MSC and coordinating regulatory and community involvement. For Army National Guard facilities, the IC is state-employed and is not responsible for executing the Army IRP. The Army National Guard Bureau (NGB), a MACOM, is the designated lead agency for the IRP at Army National Guard facilities and is responsible for execution of the IRP.

PROGRAM MANAGEMENT AND DEVELOPMENT

In FY96, the ACSIM directed that beginning in FY97, the distribution of IRP funds be decentralized from the USAEC to the MACOMs. This action affected specific changes to procedures for the execution of the IRP.

A Decentralization Implementation Statement that details procedures for execution of the IRP can be found in Attachment B.

Installation Action Plans (IAPs)

The key document in the management and execution of the IRP is the IAP. The IAP outlines the total multi-year integrated, coordinated approach to achieving an installation's restoration goals. The plan is used by the USAEC, MACOMs/MSCs, and installations to monitor requirements, schedules and budgets. For each site within the Defense Sites Environmental Restoration Tracking System (DSERTS), the IAP documents IRP requirements, the rationale for the technical approach and corresponding financial requirements. Prior year funding and tentative cost estimates through the entire remedial process are included. Estimates of cost must be fully supportable, either using a cost estimating model or engineered estimate. The IAP contains the IRP history, current DSERTS status, contaminants of concern, response actions taken, and past milestones, as well as any possible future response actions.

Each installation receiving IRP funds is required to prepare an IAP annually. In the case of the NGB, the MACOM acts as the installation and is responsible for preparing the IAP.

IAPs are to be updated and submitted through the MACOMs to the USAEC on March 15 of each FY. The date of IAP submission ensures that all installation-level execution data are available to the USAEC for development of the MACOM budget allocation. This information is also needed to support the Spring DoD In-Process Review, where USAEC presents the Army's restoration program. If the USAEC does not receive plans from the MACOMs on March 15 for each installation with ongoing or future IRP requirements, the amount of the delinquent installation's total IRP requirements for the next fiscal year will not be included in the MACOM's total requirements. The MACOM total requirements are used to determine the allocation of funds for the FY+1.

Even though an installation is required to officially submit an approved IAP annually, the installation should update the plan whenever a change to the program occurs or as needed for presentation to regulators and interested public. At the direction of the IC only, the IAP may be distributed to regulators/the public to present the planned restoration activities for the installation.

The most recent guidance for preparation of IAPs is contained in the 11 Mar 96 memorandum from USAEC, subject: FY96 Guidance for Required Installation Action Plans.

Defense Sites Environmental Restoration Tracking System (DSERTS)

The DSERTS is a Windows-based personal computer program used Army-wide by MACOMs, installations, and program managers. DSERTS provides an automated method to manage, track, and query data on activities conducted under the DERP (IRP and BRAC).

DSERTS data are used to meet upward reporting requirements and to manage the Army's IRP. The DSERTS is a source of information for the following:

- DERP Annual Report to Congress
- Program Objective Memorandum
- President's Budget
- Site-level Cost-to-Complete
- Relative Risk Site Evaluations
- IRP Work and Obligation Plans
- DoD In-Process-Reviews/Measures-of-Merit
- Quarterly ACSIM IRP Reviews
- Installation Action Plans

Roles and Responsibilities. The following roles and responsibilities are necessary for the DSERTS data calls:

Installations. Installation personnel maintain a current list of all sites on the installation that have "Completed", "Underway", or "Future" restoration activities. Site-level data includes Site Name/Description, Site Type, Restoration Program (IRP or BRAC), and Phase/Cleanup Action status.

As part of DSERTS, installations evaluate all in-progress (not response complete) sites for relative risk.

Installations report key program status elements in DSERTS, such as information on Records of Decision/Decision Documents, Federal Facilities Agreements and Restoration Advisory Boards.

For DSERTS data submissions, the installation initiates a DSERTS Data Chain-of-Custody form and submits the form to the next higher level, certifying data review and identification of significant data changes. The exception is the NGB, where the NGB maintains the DSERTS data base.

MACOMs. The MACOMs provide quality assurance on the DSERTS data submitted by installations. Data must be consistent with the IAP and in accordance with the DSERTS Army Guidance.

The MACOMs consolidate installation data files into a MACOM file for submittal to the USAEC in a timely and accurate manner.

Concurrent with the data submittal, MACOMs forward the DSERTS Data Chain-of-Custody form certifying data review.

USAEC. The USAEC provides DSERTS software, users manuals, Army guidance, and training to installation and MACOM personnel as required by new software versions and policy/guidance updates. The USAEC also provides on-site assistance as requested by MACOMs and installations.

USAEC reviews all MACOM data submissions for completeness and consistency with Army DSERTS Guidance. Any necessary revisions will be coordinated with the MACOM and installation.

USAEC consolidates MACOM data files into an Army file for submittal to ODUSD(ES). USAEC provides input to support the annual Report to Congress, DoD In-Process Reviews, the Program Objective Memorandum, and the budget.

New Sites. New sites are added to the DSERTS if the sites are identified in a Preliminary Assessment (PA) conducted for an active installation listed on the Federal Agency Hazardous Waste Compliance Docket. New sites are input to DSERTS when the PA phase status is completed as either "Response Complete" or with follow-on action. New sites with follow-on action can only be added to the DSERTS after the relative risk category has been determined. Sites with a PA phase status of "underway" or "future" cannot be input to DSERTS.

Data Submittals. The DSERTS is to be updated and submitted through the MACOMs to USAEC on March 15th and October 15th of each FY, except for the FY96-FY97 fall submission, which will be due on 8 Nov 96. These submission dates will ensure that all installation-level execution data is available to USAEC to develop MACOM budget allocations. This information is also needed to support the semi-annual DoD In-Process Reviews when USAEC presents the Army's restoration program. For the Spring data submittal, if the USAEC does not receive DSERTS from MACOMs on March 15th for each of their installations with ongoing and future IRP requirements, the amount of the delinquent installation total IRP requirements for the next FY, will not be included in the MACOM's total requirements. The MACOM total requirements are used to determine the allocation of funds for the FY+1.

For additional DSERTS information see the DSERTS software on-screen Help, the DSERTS User's Manual, Sept. 1996 and the DSERTS Army Guidance Manual, Sept. 1996.

Relative Risk Site Evaluations (RRSEs)

The ODUSD (ES) established restoration goals for the DERP using a risk management concept with RRSEs. The RRSE uses common standards and rating definitions for all military Services to ensure uniform categorization DoD-wide and ensure restoration work across DoD is generally sequenced first at sites that pose the most risk to human health and the environment. The RRSE is not a substitute for a baseline risk assessment or health assessment, nor is it a means of placing sites into a "no further action" category.

The categorization of IRP sites into relative risk groups is based on an evaluation of contaminants, pathways, and human and ecological receptors in ground water, surface water, sediment and surface soils. Evaluations of these factors at a site are combined to place the site in an overall category of "high", "medium" or "low" relative risk.

RRSEs are required for all sites with ongoing IRP activities and should be performed with available site data. Using the RRSE module in DSERTS, installations evaluate each DSERTS site with available data and requires further response for relative risk. Installations review and update RRSE data when DSERTS is updated in March and September of each FY. DoD uses relative risk to track the Army's progress in site cleanup, therefore it is important to re-evaluate the relative risk of sites for each DSERTS data call, particularly for those sites where remediation has taken place.

RRSEs are not required for "Response Complete" sites and sites where a remedy is in place or where remedial action operations (RA(O) or long-term monitoring(LTM) is underway. Any site in the RI/FS, IRA, REM or RA phase should have available data and must be evaluated for relative risk.

Per DoD guidance and Army policy, installations are to solicit stakeholder involvement throughout the RRSE process. The IAPs, together with the resultant relative risk evaluations can serve as the basis for dialogue with stakeholders (local community and regulator representatives) on sequencing work at sites.

For detailed guidance on the RRSE, see the Relative Risk Site Evaluation Primer, ODUSD(ES), Summer 1996 (Revised Interim Edition).

Cost-To-Complete (CTC)

In FY95, the DoD required that all Services develop a comprehensive estimate, by site, of the total cost for completing all environmental cleanup under the IRP. The Army effort, referred to as the Cost-To-Complete Study and Analysis, was completed in June 1995 for all active Army installations, and limited Army Reserve and Army National Guard installations.

The DPG requires an annual update of this estimate of cost to complete. Each DSERTS site with any future planned restoration activity must include estimates of cost in the IAP. The CTC estimates along with RRSEs are now the basis of the Army's IRP budget. To build the IRP budget, site-level CTC data are provided in the Spring (Mar 15th). The AEC currently collects CTC estimates as a centralized effort, but is developing a CTC DSERTS module. When the CTC DSERTS module is completed, installations will update CTC estimates in accordance with the DSERTS submission schedule. It is anticipated that the CTC will be updated as a centralized effort for FY97 and possibly FY98. Installations will be requested, through their MACOM, to provide information to support the centralized effort.

Environmental Program Requirement Reports

Environmental Program Requirement (EPR) reports (formerly known as A-106/RCS-1383 reports) identify all Army environmental requirements, including the IRP. The EPR report tracks identified, programmed and budgeted requirements, as well as, obligation incurred during execution. Individual EPR reports may identify multi-site (project) requirements, however the option to prepare EPR reports by site is encouraged. Submission of the EPR data base is required in the Fall (Dec.) of each fiscal year (submissions in the Spring (May) are optional). Every effort must be made to incorporate updated CTC estimates to the EPR reports for IRP sites. A multi-site EPR report should include the sum total CTC for all sites addressed in the report.

Previously, the EPR report was used to develop the IRP Work Plan. The IRP Work Plan is currently developed with MACOM obligation plans, however EPR reports remain an Army requirement. All newly created IRP EPRs must be submitted to AEC when making additions to the IRP Work Plan.

For detailed guidance on the EPR submission, see the Policy and Guidance for Identifying U.S. Army Environmental Program Requirements, dated 20 Dec. 1995. Part 6 of this document pertains specifically to restoration.

Budget

The Army's restoration budget is apportioned into 5 categories:

- 1) Program Management
- 2) Projects
- 3) HQDA Project Set Asides
- 4) DSMOA
- 5) ATSDR

The budget is built by DSERTS site in accordance with the DPG and is based on the Army's CTC estimates and RRSEs. The DPG requires that each cleanup program address sites in Relative Risk categories within a given timeframe. The USAEC builds the budget by consolidating MACOM identified requirements.

Program Management. Program management includes salaries, travel, supplies, MACOM program management costs, TJAG support, RAB administrative costs, Technical Assistance for Public Participation costs, Technical Review Committee administrative costs, costs for PA/SIs for installations on the Federal Agency Hazardous Waste Docket, and any other mission-funded costs. Program management is not to exceed 10% of the total IRP budget.

Projects. Projects include costs, tracked by site, to execute remedial responses such as studies, removals, interim and final remedial actions, and long-term monitoring. Contract administration costs (both prior and current year), in-house support, and any costs associated with execution of IRP activities tracked by site are also project costs. At least 90% of each MACOMs' project funds must be committed to "high" relative risk sites. At the MACOM discretion, 10% of project funds can be used for lower relative risk category sites and for data collection to evaluate relative risk for "Not Evaluated" DSERTS sites.

HQDA Project Set Asides. Project set asides are those that have been negotiated by Headquarters, Department of the Army.

DSMOA/CA. The U.S. Army Corps of Engineers executes the DSMOA/CA program and reports on the status of the DSMOA/CA program at the DoD In-Process Reviews. The Army provides IRP funds for State regulatory IRP services at Army installations. USAEC reviews proposed DSMOA/CA budgets and quarterly reports from the States for consistency with the approved IRP Work Plans and eligibility for reimbursement.

ATSDR. The U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM) is the Army's Liaison with ATSDR and reports on the status of the ATSDR program at the DoD In-Process Reviews. The USACHPPM provides the USAEC with an Annual Plan of Work for ATSDR at Army installations in May/June. USAEC reviews the proposed ATSDR budget for consistency with the approved IRP Work Plan and eligibility for reimbursement. The USACHPPM provides MACOMs and installations with a schedule for site visits.

Programming Funding for New Sites. The Army provides IRP funds for sites in DSERTS and for PAs required by the Federal Agency Hazardous Waste Compliance Docket. MACOMs may fund a PA for installations on the docket with program management funds. IRP funds are not available for PAs at installations not on the docket nor for relative risk data collection for sites not in DSERTS. New sites can receive funds only after being added to DSERTS after an assessment is finalized and the relative risk category has been determined.

MACOM Requirements. MACOM requirements are submitted as FY+1 requirements on March 15th along with the IAPs and the Spring DSERTS data. The FY+1 requirements are used to determine the IRP allocations for each MACOM for the next FY. These allocations are identified to the MACOM and the Army Budget Office (ABO) as the MACOM annual funding plan (AFP) for the IRP. Data is used for the Program Objective Memorandum (POM) submission, the budget estimates, and the Army's portion of the President's Budget.

After the MACOMs submit their total FY+1 IRP requirements, IAPs and DSERTS on March 15th, USAEC notifies the MACOMs of their preliminary AFP. A preliminary FY+1 MACOM obligation plan is then due to USAEC on April 15th for development of the POM. The final MACOM AFP is determined in June and the final FY+1 MACOM obligation plan is due to USAEC in July.

Files for the FY+1 MACOM requirements will be provided to the MACOMs by USAEC for updating in FEB/MAR.

Obligation Plans

MACOMs report current obligation by installation, site, phase, and quarter, by updating the final FY+1 obligation plan throughout the next FY. The updated obligation plans are due to USAEC on the first day of the second month after the end of the quarter; Feb 1, May 1, Aug 1 and Nov 1. During the year, at the quarterly Execution Program Reviews, the MACOMs brief the USAEC on its progress towards obligation of their AFP, explaining any discrepancies. Deviations in funding levels per site are to be updated quarterly for the Execution Program Reviews.

Quarterly obligation plan updates are to be reconciled with the Defense Financial Accounting System (DFAS) and the Corps of Engineers PEAR reports. Installation or executor resource managers input installation and phase level obligation information to the DFAS using AMS codes identified in the DFAS-IN manual 37-100-97.

At least 90% of each MACOMs' project funds for the fiscal year must be committed to "high" relative risk sites. At the MACOMs' discretion, 10% of project funds can be used for lower relative risk category sites and to evaluate relative risk for "Not Evaluated" DSERTS sites, however, the obligation plans **MUST** reflect 100% of the MACOM AFP.

Obligation Plan Elements. The obligation plan contains several components besides the planned obligation by DSERTS site and by quarter. Site RRSE ratings, decision document dates, phases, associated EPR report numbers, priority codes, legal drivers, and milestones are also required in the Obligation Plan.

The format for the obligation plan is included in Attachment C of this management plan. Priority code definitions, legal driver codes, milestone codes and accepted phases are also included.

IRP Work Plan

The USAEC prepares IRP Work Plans for the current fiscal year, the budget years (FY+1 and FY+2) and five future years (FY+3 through FY+7). Compiled from MACOM obligation plans, the work plan is a prioritized listing of the Army's total IRP requirements and reflects MACOM requirements, by site, for each installation. The work plan is revised quarterly to add new sites eligible for execution based on input from the MACOMs at quarterly Program Execution Reviews. In accordance with eligibility guidance, the MACOM is authorized to issue funds only for those sites included in the approved IRP Work Plan.

The outyear IRP Work Plan, used for the POM submission in June, is developed based on RRSEs and CTC estimates. The outyear IRP Work Plan includes legal drivers and milestones for each site.

Additions to the IRP Work Plan. When unforeseen issues arise that take precedence over approved line items on the IRP Work Plan, an installation identifies new requirements to be added to the work plan. The MACOM must provide an updated obligation plan, an EPR report, a DSERTS printout of site data indicating RRSE ranking, and a justification for adding new site requirements for execution. Additions to the work plan can be submitted at any time, but must be summarized at the quarterly Program Execution Reviews.

Execution Strategy

Obligation Goal. The DoD goal for obligation of funds is 28% by first quarter, 55% by second quarter, 80% by third quarter and 100% by fourth quarter. The Army's strategy is to exceed the DoD goal and have the majority (90%), of the program executed by the end of the third quarter. To meet this goal, MACOMs should ensure that no projects are planned for fourth quarter execution without written justification to the USAEC.

DPG Goal. The Army's strategy to meet the goals of the DPG (to clean up to a lower relative risk category or have remedial systems in place, for (1) 50 and 100 percent of all currently identified high relative risk sites by the end of FY 2002 and FY 2007, respectively (or within three years for any newly identified high relative risk sites; (2) medium relative risk sites by FY2011; and (3) low relative risk sites by FY2014) is to focus funding on "high" relative risk sites. At least 90% of each MACOMs AFP for the fiscal year must be committed to "high" relative risk sites. At the MACOMs' discretion, 10% of the AFP can be used for lower relative risk category sites and to evaluate relative risk for "Not Evaluated" DSERTS sites.

No installation will receive more than 10% of the approved Army IRP budget for projects without explicit approval of the ACSIM and the concurrence of DASA(ESOH). Justification for additional funding must be made in writing to the USAEC, who will forward the request for approval. In some cases, the installation may have to brief their request to the ACSIM and DASA(ESOH).

Remedial Action Goal. The Army's execution strategy is also to meet the DoD goal to obligate a percentage of MACOM project funds towards remedial actions (including removals, interim remedial actions, long-term operations and monitoring). This goal, which increases in future fiscal years, is 65% for FY97. MACOMs should use this goal when determining their installation's allocation of IRP funds and provide justification for a low percentage of funds for remedial actions.

Program Management Goal. The Army's execution strategy is to limit program management funds to 10% of the IRP budget.

Funds Distribution

In August, MACOMs annually submit a memorandum on distribution of their AFP. The USAEC, through the ACSIM, coordinates with the Army Budget Office (ABO) to issue FADS and advise MACOM resource management of the planned distribution. USAEC will perform a mid-year review of execution, recommend adjustments as necessary and notify MACOMs and ABO of the revised distribution.

Performance Measures

Program Execution Reviews. Quarterly, the USAEC will hold meetings with the MACOMs to review execution of the IRP and discuss IRP issues. At these quarterly reviews, the MACOMs will brief USAEC of its progress towards obligation of their AFP and any additions to the work plan.

The ACSIM requires quarterly reports on the execution and obligation of the IRP. MACOM briefing charts from the quarterly Program Execution Reviews will be presented as part of the ACSIM quarterly reviews.

ACSIM IRP Reviews. The ACSIM requires quarterly reports on the execution and obligation of the IRP. These reports will be presented at the MACOM-level with detailed installation backup, as appropriate. Other reporting requirements include, but are not limited to, DSERTS status, the annual Report to Congress, semi-annual budget execution reporting, annual reporting through the POM process, and the annual CTC report.

DoD In-Process Review. ODUSD (ES) requires that DoD components monitor program progress and report semi-annually in June and November/December. The Army uses DSERTS data, RRSE data, budget data, and CTC information to report DERP status in support of the Army IRP.

The Defense Environmental Cleanup Program Annual Report to Congress. The DoD is required to submit an annual Report to Congress that describes the DERP (IRP and BRAC) accomplishments during the previous FY. The report is required by section 120(e)(5) of SARA that applies to all Federal facilities and section 211 of SARA, as amended on 10 Nov. 93, that pertains to the DERP. The report outlines progress made in carrying out environmental restoration activities at military installations. Included in the report are success stories highlighting significant DERP activities and initiatives, narrative summaries for NPL, proposed NPL, and major BRAC installations, and the status of the cleanup at installations with sites in the DERP.

In September, installations and MACOMs are requested to submit success story candidates to USAEC. In October, installations and MACOMs are also requested to prepare or review narrative summaries.

The DSERTS is a critical source of information for the report. The DSERTS Fall Data submission is used for the report to Congress, therefore, installations and MACOMs should ensure that the DSERTS data is updated and submitted as required. Preparation of the report begins in September of each year with distribution to Congress and the public by 31 Mar. Copies of the report are also distributed to MACOMs, ICs, and program executors.

Program Management Timelines

- **Oct.** - Report to Congress Draft Narratives
- **Oct. 15** - DSERTS Fall Data Submission
- **Nov.** - **MACOM 4th Quarter (FY-1) Obligation Plan (Year End Close-out)**
 - Execution Program Review
 - ACSIM Quarterly IRP Review
- **Dec.** - DoD Semi-annual IPR (November/December)
 - Annual EPR Report Submission
- **Feb.** - **MACOM 1st Quarter FY Obligation Plan Update**
 - DSERTS Spring Data Call
 - Execution Program Review
 - ACSIM Quarterly IRP Review
 - CTC Update (FY97 only)
- **Mar. 15** - Annual IAP submission
 - DSERTS Spring Data submission
 - CTC Update (FY98+)
 - MACOM FY+1 Requirements
- **Mar. 31** - Preliminary MACOM Annual Funding Plan (AFP)
 - Distribution of the Report to Congress
- **Apr. 15** - Preliminary MACOM Obligation Plan for FY+1 (for POM)
- **May** - **MACOM 2nd Quarter FY Obligation Plan Update**
 - Optional EPR submission
 - Execution Program Review
 - ACSIM Quarterly IRP Review
- **June** - DoD Semi-annual IPR
 - POM submission
 - Final MACOM AFP
- **July** - **Final FY+1 MACOM Obligation Plan**
- **Aug.** - **MACOM 3rd Quarter FY Obligation Plan Update**
 - Execution Program Review
 - ACSIM Quarterly IRP Review
 - MACOM AFP Distribution Memorandum
- **Sept.** - Input for the President's budget
 - Report to Congress Success Stories Narratives
 - DSERTS Fall Data Call

PROGRAM EXECUTION

Installation

The Installation Commander (IC) is accountable for the IRP at his/her installation, therefore, the IC is responsible for execution of the restoration program. With MACOM concurrence, the IC has the option of determining the performer(s) for executing the IRP at his/her installation. For Army National Guard facilities, the IC is state-employed and is not responsible for executing the IRP. The NGB is the designated lead agency for the IRP at Army National Guard facilities and is responsible for execution of the IRP.

- Each IC assigns a Remedial Project Manager (RPM), to ensure all work is accomplished in accordance with regulatory, DoD and Army policy. The RPM is the primary point of contact between the installation and their MACOM, ATSDR, USACHPPM, USAEC, HQDA, regulators, the public and their IRP executor.
- The installation communicates and negotiates with regulators and is the sole point of interface with all regulators.
- The installation executes the Community Relations Program; including determining interest and if appropriate, developing a Restoration Advisory Board (RAB) or chairing a Technical Review Committee, establishing and maintaining the public repository and administrative record.
- The installation prepares and submits IAPs, DSERTS updates, obligation plans, EPR reports, and related changes to their MACOM.
- As appropriate, installations are responsible for including ATSDR recommendations from the Public Health Assessment into the IAP.
- The installation ensures that CTC estimates are consistent with identified requirements reported through the EPR reports.
- The installation implements projects, including identification of funding and reporting requirements and programs necessary IRP funds through EPR reports and obligation plans with estimates of cost and time requirements for performance of specific tasks.
- The installation assigns tasks to their IRP executor describing the general scope of activities and provide project criteria, goals and general milestones for restoration work. Installations should obtain maximum competition when selecting project management services.

- The installation will provide appropriate funds, in coordination with their MACOM/MSC, to their IRP executor for all work required. The installation ensures that funds are appropriated to eligible projects only. The last resource management office (installation or IRP executor) to receive restoration funds follows standard resource management practices to input obligation information, by installation and phase to the DFAS. The installation or IRP executor ensures that their resource management office account for the fenced restoration funds in accordance with DFAS-IN Manual 37-100-97.
- The installation approves proposed schedules and deadlines for all tasks and deliverables and provides comments and approvals to the IRP executor on items such as scopes of work and project documents in accordance with approved schedules.
- The installation provides guidance to the IRP executor concerning all interpretations of statutes and regulations that may effect performance of a task and document any deviations from DoD or Army policy. The installation RPM is responsible for obtaining concurrence from their MACOM/MSC of any deviations from policy and guidance.
- The installation coordinates with the IRP executor to resolve any impediment to completion of the task on or before the stated deadlines and at or below the stated costs. If the IRP executor fails to meet a deadline resulting in a penalty to the Army, the installation RPM is responsible for notifying the MACOM and the USAEC of the penalty and any associated costs.
- The installation provides copies of project documents for review and comment to appropriate Army proponents of the IRP such as their MACOM/MSC, the USAEC, USACHPPM, ATSDR (for installations or proposed for listing on the NPL), and higher HQDA.
- The installation provides copies of all RODs/DDs for review and concurrence to their MACOM/MSC, USAEC and USACHPPM prior to release of funds for removal/interim/remedial action contracts.
- If the IC believes the executor's performance is unsatisfactory, the IC contacts the commander of the executing agency and attempts to resolve the issues. Performance should be judged on the executor's ability to meet schedules, communicate with the installation staff, provide quality reports, effectively use available funding resources, etc. If the quality of performance by the executor continues to be unsatisfactory, the IC, in concurrence with the MACOM, may transfer execution to another performer. Appropriate notifications shall be made to the executor and the MACOM so that funds can be recovered and redirected to the new performer.

Executor

The U.S. Army Corps of Engineers (USACE) executes the majority of Army restoration projects. The USACE established Hazardous, Toxic and Radiologic Waste (HTRW) Design Districts for executing Army IRP activities. Each HTRW Design District works within specific geographic boundaries and every Army installation is supported by a geographically designated HTRW Design District. Approval must be obtained from the Director of Military Programs at headquarters USACE if the installation prefers using a USACE District outside of the designated geographic boundary.

Installations and MACOMs also execute IRP projects. USACHPPM is available to execute specific projects under the IRP such as specialized risk assessment and initial site assessment projects, particularly preliminary assessments, site inspections, and relative risk site evaluations.

Historically, the USAEC has been a major executor of the Army IRP. In FY96, the ACSIM directed the Center phase out of direct execution of the IRP at installations by 1 Oct. 97.

Use of government agencies outside of the Army to execute the IRP is discouraged except under unusual circumstances. As appropriate, Economy Act procedures will be followed. Installations should contact their resource management and legal offices concerning Economy Act procedures. ATSDR (not an Army agency) through a Memorandum of Agreement (MOA) with DoD, performs Public Health Assessments for all installations on or proposed for the NPL. The MOA also authorizes ATSDR to perform Public Health Consultations as requested for any installation.

- The IRP executor assigns a Project Manager to be the primary point of contact for the installation Environmental Coordinator. The Project Manager serves under the authority and direction of the installation RPM in accordance with specific tasks.
- The IRP Executor provides estimates of costs and time requirements for performance of specific tasks forwarded by the installation. The estimates include in-house costs, specific contract and pricing data, and costs charged for contract supervisory and administrative services applicable to each FY for the contract administration. The IRP executor utilizes historical cost data from analytical laboratories to ensure the executor can negotiate the lowest available price. The IRP executor also plans laboratory analyses to minimize higher cost growth turnaround time requirements.

- The IRP executor proposes schedules for all deliverables and accomplishes all tasks within time deadlines set forth by the installation. Tasks will not be considered complete until reviews are prepared for all work performed and accepted by the installation RPM.
- The IRP executor recognizes the installation RPM as the sole point of interface with all environmental regulators, report any contacts by regulators immediately and attend all meetings as requested by the installation RPM.
- The IRP executor will request specific approval from the installation RPM before release for publication of any information gathered. The IRP Executor will not release any information concerning the installation's restoration program without approval from the installation.
- The IRP executor must direct their contracting offices to determine whether existing contracts can be utilized before initiating new contracts for environmental work.

Memorandum of Agreement (MOA). The installation and IRP executor may avoid disputes by entering into a MOA. The MOA should identify the roles and responsibilities and extent of support that the IRP executor will provide the installation.

A suggested generic Memorandum of Agreement can be found in Attachment D of this management plan.

MACOM

The MACOMs are responsible for direction and management of the IRP for installations under their command. The MACOMs provide quality assurance on the data provided by installations for use in reporting Army requirements. All requirements must meet DoD criteria for eligibility and must have relative risk site evaluations completed in accordance with current Army guidance.

- The MACOMs consolidate installation requirements for FY+1 execution and ensure all requirements identified are provided in a timely and accurate manner.
- MACOMs maintain a plan for obligation of the funds currently identified in the MACOM program. MACOM resource managers require parts of this plan for planning continuing resolution authority (CRA) and subsequent funds distribution.
- MACOMs insure funds are obligated only against sites identified on the approved work plan and are in accordance with Army quarterly goals (28%, 55%, 90% and 100%).

- MACOMs report on current obligation by installation, site, phase, and quarter to the USAEC for consolidation and reporting.
- Using the goals of the DPG and the Army's Priority Code System, the MACOMs distribute funds to support their installations or their installations' executors for identified IRP projects.
- The MACOMs submit IAPs, DSERTS updates, obligation plans, EPR reports and related changes to the USAEC.
- MACOMs review and staff DDs/RODs for approval signature.
- MACOMs distribute to their installations restoration guidance received from USAEC.

USAEC

The USAEC is a Field Operating Agency under the direction of the ACSIM. Pursuant to AR 200-1, the USAEC is the HQDA Program Manager for the IRP and provides a broad range of program management and oversight services in support of HQDA, MACOMs, and installations.

As the Army's IRP Program Manager, the USAEC has an oversight function for all active sites Army installations. USAEC provides technical assistance with DSERTS updates, EPR report submissions, revisions to the IAPs, and CTC updates and guidance in the overall IRP process. The IAPs, in conjunction with the installation obligation plans, are used by USAEC to oversee and track the progress of the IRP at each installation.

USAEC oversight personnel notify the MACOM/MSO prior to any site visits and also notify the MACOM of any issues that arise from the site visit. IRP project documents should be provided to the USAEC oversight program manager. When documents are finalized, USAEC will submit copies to the Army's Technical Information Center (TIC), a library of all Army environmental documents. The TIC is located at the USAEC at Aberdeen Proving Ground, MD.

If an installation or MACOM/MSO is not aware of their USAEC oversight program manager, contact the Restoration Program Oversight Branch of USAEC, Restoration, Program Management and Oversight Division, DSN 584-3261 or commercial (410) 671-3261.

The Environmental Restoration Oversight Mission Statement can be found at Attachment E of this management plan.

PROGRAM PROCEDURES

The IRP was implemented to address the Army's cleanup responsibilities under CERCLA. Many sites in the Army's IRP address cleanup under the RCRA corrective action process. The RCRA corrective action process addresses both currently active operations and inactive sites created from past practices. While the RCRA corrective action process parallels the CERCLA process, there are several differences. An installation must be able to support any requests to use IRP funds to respond to RCRA requirements under the corrective action process.

Federal Agency Hazardous Waste Compliance Docket

Section 120(c) of CERCLA, as amended by SARA, requires the USEPA to establish a Federal Agency Hazardous Waste Compliance Docket. The docket contains information regarding Federal facilities that manage hazardous waste or from which hazardous substances may be or have been released. The docket is updated every six months. An installation is required to submit a Preliminary Assessment/Site Inspection (PA/SI) report to the appropriate USEPA Region within 18 months of being listed on the Federal Agency Hazardous Waste Compliance Docket. When an installation is listed on the docket all properties within the installation boundary need to be identified in the PA/SI (i.e. National Guard and Army Reserve facilities).

Preliminary Assessment/Site Inspection (PA/SI)

The PA is a description of sites on real Army property with the potential for having released a hazardous material. If cleanup requirements cannot be determined from the PA data, an SI may be required. Unless directed to conduct an SI by the USEPA, the SI is an optional phase. SI information is used to decide whether to initiate a removal, begin an RI/FS, or terminate response activities.

If the PA indicates that sufficient data exists to facilitate an HRS2 score or indicates that there is an apparent need for a remedial response, the SI phase is not necessary. Besides conducting an SI, remedial responses after the PA may include conducting an RI/FS or a removal action.

Remedial Investigation/Feasibility Study (RI/FS)

Data is collected during an RI to characterize the nature and extent of known contamination at a site. During the FS, the RI data is analyzed and remedial alternatives are identified. The RI and FS should be conducted concurrently. The data collected in the RI influences the development of remedial alternatives in the FS, which in turn affects the data needs in the RI.

A health risk assessment (HRA) and ecological assessment is prepared as part of the RI. Per AR 200-1, all risk assessments completed for the IRP are approved by the Army Surgeon General through the USACHPPM. To facilitate approval of the risk assessment, prior to the initiation of field work, the RI work plan should be provided to USACHPPM for review. Installations with sites on or proposed for the NPL are required by CERCLA to have a Public Health Assessment (PHA) conducted by ATSDR. While a PHA is similar to a human health risk assessment, the PHA is not confined to contaminants at the site and focuses on public health issues. ATSDR conducts the PHA as soon as possible after the site is proposed for the NPL, so that recommendations can be used in the remedy selection process.

An RI/FS must be started no later than 6 months after an installation has been added to the NPL.

Proposed Plan (PP)

The preferred alternative or cleanup approach for a site is presented to the public in a Proposed Plan (PP). The PP provides a summary of alternatives studied in the FS. Draft PPs are reviewed by the serving installation Public Affairs Office. CERCLA 117(a) requires the Army to conduct a public meeting/availability session about the PP at or near the facility, and a transcript of the meeting be made available to the public with a reasonable opportunity for written and oral comment. Copies of the PP are included at information repositories and/or distributed to mailing lists before the public comment period begins and can be distributed to Restoration Advisory Boards, if applicable. To facilitate approval of the selected remedy during the Record of Decision, all PPs are provided to the MACOMs/MSCs, USAEC and USACHPPM for review.

Responsiveness Summary

Following the PP public comment period, the Responsiveness Summary is prepared describing all comments and how the comments have been addressed. The responsiveness summary, to include a transcript from the public meeting, is incorporated into the Record of Decision.

Record of Decision (ROD)/Decision Document (DD)

ROD. Following receipt of PP public comments and any final comments from the regulators, a remedy is selected and documented in a ROD. The ROD serves as legal certification that the remedy was selected in accordance with the requirements of CERCLA and the NCP.

The ROD, with the Responsiveness Summary, is forwarded through command channels for Army review (see ROD/DD Review and Approval Procedures section). After receiving appropriate concurrence, the installation forwards the ROD for approval and signature to the appropriate authority. Regulators should not sign the ROD prior to all Army command channel concurrences. The ROD is also not to be submitted for approval prior to approval of the final FS report.

Per the NCP (Section 300,430 (f)(6)), after the ROD is signed, the Army shall:

- 1) Publish a notice of the availability of the ROD in a major local newspaper of general circulation (the USEPA will publish the notice in the Federal Register), and
- 2) Make the ROD available for public inspection and copying at the information repositories at or near the facility prior to the commencement of any remedial action.

Per SARA 120 (e)(2), the remedial action must commence within 15 months of signing the ROD.

A signed ROD may be re-evaluated at any point during the remedial action process (i.e. during remedial design, before or after operations are in place, when selected remedy is found to be ineffective or if recently developed technology may be more beneficial towards cleanup). If, after re-evaluation, the selected remedy changes, the ROD will have to be altered or "re-opened" before the changes can be implemented.

DD. The Army has adopted the term "decision document" for the documentation of 1) removal (REM) or interim remedial action (IRA) and remedial action (RA) decisions at non-NPL installations and 2) sites at NPL installations at which REM/IRA decisions have been made. The DD consists of six parts:

1. Purpose
2. Site Risk
3. Remedial Alternatives
4. Public/Community Involvement
5. Declaration
6. Approval and Signature

The DD for sites which are not covered by an IAG/FFA need not be an elaborate document and in most cases will only be two to three pages in length for simple projects. The DD represents the Declaration Section of a ROD. All DDs will be maintained in the installation Administrative Record and the installation's permanent environmental files.

For an outline format and DD example, see Attachment F of this management plan.

ROD/DD Review and Approval Procedures. Army policy and procedure for preparing and finalizing RODs and DDs have undergone significant changes in the last two years.

Responsibilities. Installations and MACOMs ensure that DDs or RODs that commit the Army to future expenses are (1) eligible for DERA funding, (2) on the IRP Work Plan, and (3) conform with priorities for risk reduction. The Army will not support funding DERA-ineligible actions with IRP funds. Installations will fund those projects with installation operating funds. Projects not complying with the above may require re-negotiation of agreements with regulators.

Installations prepare RODs/DDs, staff the RODs/DDs for review and concurrence of the selected action, and obtain the appropriate approvals prior to requesting the release of funds for award of a REM/IRA/RA contract. Projects awarded prior to development and approval of RODs/DDs are subject to contract modification and will be reported to the ACSIM during IRP reviews.

Review Procedures. After an installation has prepared a ROD/DD, and prior to submittal for appropriate approval signature, all documents are staffed through the installation chain-of command (the RPM, and servicing public affairs and legal offices). Copies of the draft document are sent to the appropriate environmental MACOM representative and review includes legal and public affairs at the MACOM. Draft copies of the ROD/DD are also provided to the appropriate USAEC and USACHPPM representative for review and concurrence with the selected action.

Approval Authority. Once the draft DD/ROD has been reviewed and concurrence has been received from the installation RPM and servicing public affairs and legal offices, MACOM, USAEC and USACHPPM, the document should be forwarded with the concurrence for signature by the appropriate authority. Approval thresholds for all DDs, including NPL RODs, are described here. Signature authority for NPL RODs shall not be delegated below a general officer (GO) or Senior Executive Service (SES) official. The only exception is that an IC, regardless of grade/rank, may sign NPL RODs selecting the no action alternative.

a. The ACSIM, approves all DDs, including NPL RODs, greater than \$6 million. MACOMs should submit 5 copies of final RODs/DDs with concurrence, needing ACSIM approval for staffing to HQDA, DAIM-ED-R.

b. The MACOM commander approves DDs, including NPL RODs, between \$2 million and \$6 million.

c. The Installation Commander approves DDs, including NPL RODs, less than \$2 million.

	DD	ROD
NO ACTION	IC	IC
LESS THAN \$2M	IC	Commanding General or designated GO/SES
\$2M TO \$6M	MACOM Commander	MACOM Commander
GREATER THAN \$6M	ACSIM	ACSIM

Timelines. After preparing the ROD/DD, installations must allow sufficient time for staffing at each level in the chain-of-command.

- a. Review and Concurrence -- Army policy for staffing RODs/DDs suggests that 60 to 90 days be allowed for technical review and concurrence to the installation staff, MACOM, USAEC, USACHPPM and the regulators if appropriate.
- b. Approval and Signature -- Army policy for staffing RODs/DDs suggests that 20 to 45 days be allowed for administrative staffing to ICs, MACOM commanders, and the ACSIM for approval and signature.

Copies. Copies of signed DDs, including RODs, at a minimum should be provided to each level in the chain-of-command below the approval authority and to the USAEC. The approving organization should also provide a copy of signed RODs to HQDA (DAIM-ED-R) and the DASA(ESOH). All signed RODs/DDs are to be reported in the IAP and DSERTS.

Changes to a signed ROD/DD. If changes to a signed ROD/DD include altering the selected remedy, the ROD/DD must be prepared, approved and re-signed in accordance with the Army review and approval procedures for the original ROD/DD.

Policy for staffing and approving DDs including NPL RODs is contained in the 16 Nov. 95 memorandum from the ACSIM, subject: Revised Interim Policy for Staffing and Approving Decision Documents (DDs).

Remedial Design (RD)

Per SARA 120(e)(2), within 15 months after finalization of the FS report and ROD/DD, the selected alternative must be designed and substantial continuous on-site activity must be underway.

The contracting process for an RD can be initiated prior to placement of the PP in the repository for public review. However, actual contract award for the RD should not take place until approval of the PP and the design will not proceed beyond the 35% completion stage until the ROD is signed. If an installation wishes to proceed beyond the 35% completion stage of the RD without an approved ROD, a request to proceed with justification for continued RD action must be submitted to USAEC for approval.

Remedial Action (RA)

Prior to award of a RA contract and commencement of RA operations, a ROD/DD must be prepared, approved and signed in accordance with Army review and approval procedures for RODs/DDs.

Many remedial technologies require operation, maintenance and monitoring after the RA is installed. In accordance with CERCLA Section 121(c), if contamination remains at a site after the RA, the site will be monitored to ensure that human health and the environment are being protected. Beginning with the initiation of the RA, a review will be made every five years until the remedy is no longer needed.

Prior to the formal conclusion of RA operations, the installation prepares a draft Completion Report with certification and documentation that (1) the RA project was conducted in accordance with the ROD/DD, (2) the site no longer constitutes a threat to public health, welfare, or the environment, and (3) further RAs are not necessary. The draft Completion Report is forwarded through the chain-of command to the ROD/DD approval authority. Following conceptual approval (and in coordination with regulatory agencies) the Completion Report is signed by the approval authority of the ROD/DD. If the ACSIM did not approve

the ROD/DD, the Completion Report is forwarded through USAEC to the ACSIM certifying completion. If the FFA requires signature of the appropriate regulatory official, the Army signs before the regulatory official. After the Completion Report has been certified complete, the installation prepares and transmits an information summary through command channels to DASA(ESOH).

Removal Action (REM)/Interim Remedial Action (IRA)

Before the initiation and/or completion of the RI/FS and the selection of a permanent remedy, a REM/IRA will be initiated if an imminent threat to health or the environment is revealed. Per the NCP (Section 300.415(b)(2)), the threat may be due to:

- 1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants, or contaminants;
- 2) Actual or potential contamination of drinking water supplies or sensitive ecosystems;
- 3) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;
- 4) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;
- 5) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;
- 6) Threat of fire or explosion;
- 7) The unavailability of other appropriate federal or state response mechanisms to respond to the release; and
- 8) Other situations or factors that may pose threats to public health or welfare or the environment.

The engineering evaluation/cost analysis (EE/CA) is an analysis of removal alternatives for a site. An EE/CA or equivalent must be prepared whenever a planning period of at least six months exists before the on-site activities are to be initiated (Section 300.415(b)(4) of the NCP).

If the cost of the removal action is greater than \$2 million or will take longer than 12 months to implement, the action is considered an IRA. Per AR 200-1, before an IRA can be initiated, an individual RI/FS with ROD/DD and an IAG/FFA should be completed, unless the regulatory agencies agree to allow other decision documentation to be completed.

All REMs/IRAs conducted with IRP funds will have a DD prepared and approved prior to commencement of the on-site remedial operations.

Off-Site Response Action

To fulfill its CERCLA responsibilities per EO 12580, the Army has the authority to conduct response actions outside of the installation boundaries, where the installation is reasonably considered the sole or the major source of the release. Off-site actions are complex and require extensive coordination because of the lack of Army control over the off-site property and the necessity for increased interaction with the public.

IC approval is required to conduct off-post monitoring. If there is an actual or high potential health threat to personnel on or off the installation, the DASA(ESOH) will be immediately notified by the IC through the chain of command. The DASA(ESOH) approves off-post response actions to start or stop a provision for bottled water, alternative water supplies, well head treatment devices or connection to a municipal water system.

The installation must provide a response plan through the command chain (with information directly to USAEC) to the DASA(ESOH) for any off-site response actions.

Requirements for notification procedures and the response plan can be obtained from AR 200-1, Section 9.

Interagency Agreement (IAG)/Federal Facility Agreement (FFA)

Upon nomination to the NPL, USEPA Regions will request that the installation and State regulator enter into an IAG/FFA. The IAG/FFA addresses the completion of all necessary remedial actions at the installation. The IC and the DASA(ESOH) will both sign the IAG/FFA for the Army. DoD and USEPA developed model language that forms the basis for negotiations. Deviations to the model language must be approved at DoD, however DoD and the Army strongly encourages that the concept of "flexible" schedules and relative risk rankings be incorporated into IAGs/FFAs. Implementation of DoD's RRSE for sequencing of cleanup activities may cause existing IAGs/FFAs to be re-negotiated. For re-negotiated agreements, the DoD and the Army, again, strongly support incorporation of the concept of flexible schedules.

The installation's servicing legal office has the lead in IAG/FFA negotiations; however, the legal chain of command may designate another lead should the installation/MACOM request assistance. When the IAG/FFA is sent to DASA(ESOH) through the command chain for signature, the ACSIM requests concurrence from the USAEC. The installation should provide USAEC with copies of the draft IAG/FFA for review and concurrence prior to sending the IAG/FFA to DASA(ESOH) for signature.

Per SARA, Sec. 120, within 180 days after EPA's review of the final RI/FS for NPL sites, the USEPA and the installation must enter into an IAG/FFA for the cleanup effort. All signed IAG/FFA information (parties and dates) are reported in the IAP and DSERTS. A copy of the final IAG/FFA must be furnished to the USAEC.

Reimbursement for non-Army Activities. While highly discouraged, an IAG/FFA may include language that the Army will reimburse other agencies (outside of the Army) for services associated with cleanup. These services must be those that the Army does not have the capability of providing and therefore are incidental to cleanup.

The outside agency to be reimbursed submits a proposed annual budget to the installation prior to development of the upcoming fiscal year budget. The proposed annual budget is categorized into tasks developed in accordance with the scope of work contained in the agreement. Subsequently, the Army only reimburses the outside agency for those specifically approved tasks.

All requests for reimbursement of services to agencies outside the Army are processed in accordance with the Economy Act (31 USC1538). The Army certifies that use of funds is legal under the Economy Act. The Army approves and reimburses only those costs that directly support the Army's environmental mission and are not part of the supporting agency's congressional funded mission. Installations and MACOMs should contact their resource management and legal offices with any questions concerning the Economy Act and reimbursement of services provided by agencies outside the Army.

For the IAG/FFA model language, see Appendix A, "U.S. Army Installation Restoration Program Guidance Manual", U.S. Army Environmental Center, December 1993 (2nd Revision).

Administrative Record

Section 113(k)(1) of CERCLA requires that an Administrative Record be established and made available for public inspection (and copying) at or near the installation for all information considered or relied on when selecting a response action. An Administrative Record is a compilation of documents that records the Army's decision-making process regarding the selection of a response action. An Administrative Record must be established and maintained for each NPL installation or non-NPL installation where a response action may be implemented under the authority of CERCLA.

Public Participation and Community Relations

Local communities are interested in the results of environmental studies conducted under the IRP because of the potential impact on their health, environment, and economic well-being. The Army fully supports public involvement programs that require the Army to solicit and consider the comments of the interested individuals, groups, and government bodies before selecting a remedial alternative. ICs are encouraged to foster open, two-way communication with the local communities as early in the process as possible. This communication should continue throughout the restoration process.

Community Relation Plan. A community relations plan is required for all Army properties on or proposed to the NPL. Installations that are not on or proposed to the NPL, are strongly encouraged to establish a community relations plan. The community relations plan provides the guidelines for future community relations activities for an installation.

Technical Review Committee (TRC). Per 10 USC 2705(C), a TRC is established whenever possible and practical to review and comment on the Army's actions with respect to releases or threatened releases of hazardous substances at installations. TRC meetings serve as working sessions for exchanging information and organizational viewpoints on operational progress, recommended applicable or relevant and appropriate requirements (ARARs), problems, and scheduling. Members of a TRC include at least one representative from the Army, and appropriate USEPA, state and local authorities, and a public representative(s) of the community(s). The IC is responsible for establishing and chairing or designating an installation/Army chairperson for the TRC.

Restoration Advisory Board (RAB). To facilitate public involvement, the Army strongly recommends the establishment of RABs. RABs are a forum between governmental decision makers and the affected community providing the opportunity for meaningful community input to the decision making process. Every installation participating in the IRP **must determine community interest** in establishing and participating in a RAB.

If an installation solicits for interest and finds there is not enough support to establish a RAB, the installation must document efforts taken to determine interest and develop follow up procedures to monitor community interest. Documentation must be attached to the IAP. If an installation determines there is sufficient interest to establish a RAB, the installation should proceed. TRCs will be converted to RABs at installations with TRCs that are interested in establishing RABs. RABs meet the requirement of 10 USC 2705(C).

Technical Assistance for Public Participation (TAPP). There may be times when community RAB/TRC members may be dissatisfied with the Army's ability to provide technical support to the RAB/TRC. Community RAB members may seek independent technical assistance to contribute to the public's ability to participate in the restoration program. To obtain funding, community members of RABs/TRCs must apply for TAPP. The installation reviews the application for eligibility and approval before developing appropriate TAPP funding requirements.

*NOTE: While TAPP has been approved, at this time, there is no mechanism to get TAPP funds from the Army to the public. Further guidance will be forthcoming regarding the distribution of Army funds for TAPP.

Policy on the role of RABs is contained in the 7 May 96 memorandum from the ASA(IL&E), subject: Issuance of Army Policy - The Role of Restoration Advisory Boards (RAB)s in Environmental Cleanup. For additional RAB guidance and information on TAPP, see Army Guidance Concerning Restoration Advisory Boards, October, 1996.

Defense Environmental Network and Information Exchange (DENIX)

DENIX is an electronic communication tool that enables Army IRP personnel to exchange information. The information exchanged through DENIX includes electronic mail, announcements, data files, reports, legislative and regulatory alerts, listings of environmental training courses, seminars, and conferences, and on-line environmental publications. DENIX is available to all DoD military and civilians involved in the environmental security arena.

Information on how to gain access to DENIX can be obtained from the DENIX hotline (217) 373-6790.

For a list of available Army IRP guidance, see Attachment G of this management plan.

ATTACHMENTS

ATTACHMENT A

Activities Eligible and Ineligible for DERP Funding

ATTACHMENT A

ACTIVITIES ELIGIBLE FOR DERP FUNDING

Investigations to identify, confirm and determine the risk to human health and the environment, feasibility studies or engineering evaluation and cost analysis (EE/CA); remedial action plans and designs; and removal or remedial actions.

Technology Demonstration and Validation necessary to conduct cleanups (6.4 research category in accordance with PBD 299, December 3, 1993)) for FY95 and FY96.

Expenses associated with cooperative multi-party cleanup plans and activities, including litigation expenses.

Remedial actions to protect or restore (not enhance) natural resources damaged by contamination from past hazardous waste disposal activities.

Cleanup of low level radioactive waste sites which have been identified as IRP sites.

Management expenses associated with the IRP. Management expenses are those overhead costs required for adequate program oversight and management.

Operation and maintenance costs for remedial and monitoring systems.

Immediate actions necessary to address health and safety concerns such as providing alternate water supplies or treatment of contaminated drinking water, when the hazard results from a release from DoD property or FUDS.

Studies to locate abandoned underground tanks, activities to determine whether a release has occurred, and clean up of contamination.

Response to releases from in service tanks discovered during initial integrity testing (leak detection monitoring) per 40 CFR 280 where testing was conducted prior to the regulatory date of December 22, 1993.

CERCLA response actions and eligible RCRA corrective actions (see items below) identified in FFA/IAGs.

Corrective actions at solid waste management units (SWMUs) required by 3004(u), (v) and 3008(h) of RCRA.

ACTIVITIES ELIGIBLE FOR DERP FUNDING (Continued)

Support services provided by another agency in accordance with 10 USC 2701 (d).

Fines and penalties imposed by regulatory agencies assessed under the authority of the Federal Facilities Compliance Act associated with IRP activities.

Remediation actions for OEW located at FUDS.

Remediation of inactive Open Burning/Open Detonation/Static Firing Sites which do not have an interim or final RCRA permit or areas which are deleted from a permit or deleted from a permit application and on which no actual treatment operations have been conducted since the Part A interim status permit was issued.

ACTIVITIES NOT ELIGIBLE FOR DERP FUNDING

Closing or capping sanitary landfills unrelated to a hazardous waste cleanup action.

Construction of hazardous waste storage, transfer, treatment or disposal facilities, except when part of a IRP response action.

Testing or repair of active underground tanks and costs of replacing leaking underground tanks.

Costs of testing, storing, disposing or replacing PCB transformers.

Costs of asbestos and lead based paint surveys, containment, removal or disposal, except where incidental to a DERP response action.

Costs of spill prevention and containment measures for currently operating equipment and facilities.

Cleanup costs of spills associated with current operations.

Costs of operation, maintenance or repair to hazardous waste treatment, storage, or disposal facilities which are currently in use (i.e., regulated or permitted), except when part of a DERP response actions.

Costs of hazardous waste disposal operations, including associated management and operational costs, unless the costs result from implementation of a DERP response action.

Overseas Environmental Restoration activities.

ACTIVITIES NOT ELIGIBLE FOR DERP FUNDING (continued)

State support services prior to October 17, 1986, past state costs not reasonably documented, state services in support of non-Environmental Restoration Program funded cleanup activities of FUDS, unless approved by DUSD(ES).

Actions (contingency response and closure) at regulated Treatment, Storage or Disposal (TSD) units which meet standards under 40 CFR 264, and which have been issued a final operating permit under 40 CFR 270.

Facility improvements to meet RCRA operating standards at TSD units.

Unexploded ordnance clearance from active or former ranges unless it presents an imminent threat to safety and is approved by the DUSD(ES).

Expenses associated with the defense and settlement of claims against the US under the Federal Tort Claims Act.

Environmental technology for 6.1, 6.2 and 6.3 funding categories.

Remediation and/or closure of Open Burning/Open Detonation/Static Firing sites which are included in a RCRA hazardous waste treatment permit or permit application or portions of prior permitted sites on which actual treatment operations have been conducted since the Part A interim status permit was issued.

Remediation of active impact ranges and firing tables.

ATTACHMENT B

**Decentralization Implementation
Statement**

ATTACHMENT B

ARMY INSTALLATION RESTORATION PROGRAM DECENTRALIZATION IMPLEMENTATION STATEMENT

SUBJECT: Procedures for decentralization of the Environmental Restoration, Army (ER,A) account.

1. Purpose: The purpose of this Statement is to define the procedures for execution of the ER,A account under decentralization.

2. Mission:

a. The U.S. Army Environmental Center (USAEC) is a Field Operating Agency under the direction of the Assistant Chief of Staff for Installation Management. Pursuant to AR 200-1, the USAEC is the Headquarters, Department of the Army (HQDA) Program Manager for the Installation Restoration Program (IRP) and provides management and integration of the planning, programming and budgeting of the environmental restoration requirements for the Army. USAEC also provides oversight for the execution of the IRP. The major Army commands (MACOMs) are responsible for direction and management of the IRP for installations under their command. The installation commander is responsible for executing the IRP at his/her installation.

b. In FY96, the ACSIM directed that beginning in FY97, the distribution of IRP funds be decentralized from the USAEC to the MACOMs.

c. Congress and the Department of Defense (DOD) require the Services to manage and report their programs at the site level. This requirement includes the collection and tracking of technical and financial information, by site, from FY96 to the completion of the Defense Environmental Restoration Program.

3. Mission Implementation: Execution of the mission as identified in paragraph 2 involves the following:

a. **Identification of Requirements.** The following roles and responsibilities are necessary to identify requirements at the site level:

(1) *Installations.* Installations are responsible to:

(a) Provide data to the USAEC to support the Army estimates for the cost-to-complete for all sites identified in the Defense Sites Environmental Restoration Tracking System (DSERTS) as requiring future action.

(b) Assign an Army Priority System (PS) code and funding to all sites identified in the cost-to-complete estimate for execution.

(c) Prepare annual updates to the Installation Action Plan (IAP), ensuring consistency with the cost-to-complete estimate and the Environmental Program Requirement reports.

(2) *MACOMs*. The MACOMs are responsible to:

(a) Provide quality assurance on the site data provided by installations for use by USAEC in reporting the Army requirements. Ensure requirements meet DOD criteria for eligibility and have relative risk site evaluation completed in accordance with current DOD and Army guidance.

(b) Consolidate installation requirements for FY+1 execution.

(c) Ensure all identification of requirements is provided in a timely and accurate manner.

(3) *USAEC*. The USAEC is responsible to:

(a) Review all MACOM submissions of requirements for completeness and consistency with the appropriate IAP for execution of the IRP. Inconsistencies will be discussed with the MACOM prior to inclusion in/exclusion from the work plan.

(b) Consolidate all MACOM identified requirements for funding in the FY+1 and determine ER,A account allotments for each MACOM. These allotments will be identified to the MACOM and Army Budget Office (ABO) as the MACOM annual funding plan (AFP) for the ER,A account.

(c) Prepare work plan for execution of the FY+1 and revise quarterly during execution of the FY program to add new sites.

(d) Consolidate MACOM requirements to prepare outyear workplans for planning purposes only. Outyear workplans will be used as basis for input to financial reporting requirements.

(e) Notify each MACOM of their projected outyear budgets for planning purposes only.

(f) Initiate annual reviews of the estimates of the cost-to-complete requirements. Annual updates to the cost-to-complete are due to DOD in the spring of each FY. Currently, this information is being centrally collected and compiled by USAEC.

b. **Tracking.** To provide accurate information by site, the execution of the program must be tracked at the site level.

(1) *Installations.* Installations will track expenditures of the installation allotment of the ER,A account, by site. This information is tracked both 1) at the site level and reported to the MACOM and 2) at the phase level and reported through the Defense Financial Accounting System (DFAS).

(2) *MACOMs.* MACOMs will:

(a) Maintain a plan for obligation of the funds to meet the Army obligation goals, currently identified for the MACOM program. Parts of this plan will also be required by the MACOM resource managers for planning continuing resolution authority (CRA) funds distribution.

(b) Insure funds are obligated only against sites and phases identified on the work plan.

(3) *USAEC.* The USAEC will:

(a) Track execution of the program and compare reports through the DFAS with the work plan and obligation input provided at the site level by the MACOM program managers.

(b) Perform a mid-year review and analysis of MACOM execution and notify the ABO of any adjustments to the MACOM AFP. MACOM AFPs are subject to adjustment for poor obligation rates; misuse of the ER,A account; delinquency in reporting; or effects of overall program funding changes..

c. **Reporting.** The ACSIM requires quarterly reports on execution and obligation of the ER,A account. These reports will be presented at the MACOM level with detailed installation backup. Other reporting requirements include, but are not limited to: the annual Report to Congress, semi-annual DOD In-Process Reviews (IPRs), semi-annual budget reporting, annual reporting through the POM process, and the annual cost to complete report to DOD. Reporting responsibilities are as follows:

(1) *Installation/Executor.*

(a) The resource manager (RM) that receives funds (either installation or executor RM) will report obligations on a monthly basis through the DFAS. This information will be entered by AMS Code..

(b) The installation Remedial Project Manager will report obligations on a quarterly basis at the site level to their MACOM as requested.

(2) *MACOM*. The MACOM will:

(a) Report on current obligation levels by installation, site, phase, and quarter. This input will be due to USAEC on the first day of the second month after the end of the quarter - Feb 1, May 1, Aug 1 and Nov 1. The format for reporting this information will be provided by USAEC.

(b) Present a summary review of the MACOM program at the quarterly MACOM Execution Program Review meetings. The format for the brief will be provided by USAEC. These briefing charts will be presented to the ACSIM as part of the quarterly review on execution of the program.

(3) *USAEC*. The USAEC will:

(a) Consolidate the Army's requirements, apply fiscal constraints, and prepare current and outyear work plans for reporting financial requirements through the Program Objective Memorandum (POM) and President's Budget submissions.

(b) Prepare input to the quarterly ACSIM IRP reviews, semi-annual DOD IPRs and annual Report to Congress.

ATTACHMENT C

Obligation Plan Format

1.0 DESCRIPTION OF OBLIGATION PLAN FIELDS:

MACOM: The acronym of the installation's major Army command.

Installation: The name of the installation.

DSERTS Number: The number assigned to each site as listed in the DSERTS data base.

RRSE: The current relative risk designation as listed in the DSERTS data base on file at AEC.

FYXX Distrib: Total requirements identified for FY distribution of DERA funds.

Proj Phase: Phase of DSERTS site to receive funds. See Section 2.0 for a listing of eligible phases and descriptions.

Date of Decision Document: Date of decision document for all remedial action phases (RA, IRA).

PS Codes: PS Code for DSERTS site to receive funds. See Section 3.0 for a listing of eligible PS codes and definitions.

FYXX Rqmt: Total amount required for each DSERTS site in a given FY. NOTE: ALL requirements in the given FY are to be listed in this field.

EPR Number: EPR (1383/A106) # related to each DSERTS site.

DSERTS site description: Site description as entered in the DSERTS data base.

Legal Driver: Legal driver as required in the POM cycle. See Section 4.0 for a listing of eligible entries.

Milestone: Milestones as required in the POM cycle. See Section 5.0 for a listing of eligible entries.

Quarterly Projections: Projected breakout by quarter only on those sites designated to receive FYXX funding. NOTE: The total projected by quarter must equal the MACOM (installation) allotment for FYXX.

Quarterly Actuals: Actual quarterly obligations by site.

Reason for Not Meeting Projected Qtr Goals: For those sites not meeting the projected quarterly obligation goals (at the end of each quarter), select one of the generic codes listed that best describes the reason for not meeting this goal.

- 1 - Contractor/Procurement Problem
- 2- Regulatory/Administrative Process
- 3- Regulators requiring more field work
- 4- Other (Provide explanation)
- 5 - Expedited

2.0 ELIGIBLE PHASES FOR THE OBLIGATION PLAN

PA/SI - Preliminary Assessment/Site Inspections. Preliminary assessment of contamination; inspection to confirm the type, quantity and extent of contamination; and evaluation of potential risks to health or sensitive environments.

RI/FS - Remedial Investigation/Feasibility Study. Studies to determine type, quantity and extent of contamination and investigations of alternative remedies to determine an appropriate, feasible method to control, reduce or eliminate the potential risk associated with contamination.

IRA - Interim Removal Actions. Removal of contaminant or other interim action to control, reduce, or eliminate sources of contamination or safeguard public health or sensitive environments pending decision and implementation of final remedial action. Includes provision of alternative water supply or treatment of contaminated drinking water supply when the hazard results from a release from Army property.

RD - Remedial Design. Costs related to design of DERA-eligible remediation project.

RA - Remedial Action. Implementation of remedial action to eliminate or reduce contamination and risks to health and/or sensitive environments. Does not include project design costs, RCRA closures, UXO disposal, closing or capping sanitary landfills unrelated to a hazardous waste cleanup action under CERCLA.

LTM -Long Term Monitoring. Costs of long-term monitoring of environmental conditions (e.g., soil and water quality) at sites in support of a DERA-funded remedial action.

RA(O) - Remedial Action Operations. Costs of operations and maintenance of systems installed as part of a DERA-funded remedial action (e.g., groundwater pump and treat systems).

RAB - Restoration Advisory Boards. RAB funding includes those expenses which are directly related to the operation of the RAB such as: RAB establishment, member selection costs, training, meeting announcements, meeting logistics, facilitators, preparation of meeting agendas, materials and minutes, document reproduction for RAB members. Do not include general community involvement expenses such as preparation of fact sheets or other information materials for public distribution, mailings, repository costs, or salaries for DOD personnel.

TRC - Technical Review Committee. TRC funding includes internal Army administrative costs such as meeting announcements, meeting logistics, preparation of meeting agendas, materials and minutes, document reproduction for TRC members, and contract support expenses. Do not include salaries for DOD personnel.

TAPP - Technical Assistance for Public Participation. The TAPP is authorized at DA level as a specific allocation to provide technical assistance to the membership of the RAB. Costs cannot be identified as TAPP unless authorized by DA.

FINE - Fines and penalties. Costs of fines, penalties, or other payments as a result of enforcement action by regulatory agencies for nonperformance of a DERA-funded site.

PGMMGT - Program management. Administrative costs for the IRP, including civilian salaries, travel, transportation, rents, communications, and computers.

3.0 ELIGIBLE ARMY PRIORITY SORT CODES FOR THE OBLIGATION PLAN

PS
CODE

DEFINITION

A Confirmed Off-Post Contamination/Imminent Threat to Human Health

To be determined by the IC following consultation with the MEDDAC personnel. Provides funding for those cases where off-post contamination or on-post threat to human health, i.e., water supply, is confirmed and immediate relief is needed. This category will be applied to projects that remove or reduce the threat to human health (e.g. alternate water supply or source removal) and to studies of these sites.

B Imminent Threat to Environment

This category will only be used with approval of DASA (ESOH) in situations where critical environments are threatened by continuing releases.

COST OF DOING BUSINESS (In general, not to exceed 10%)

C Management & Salaries

Includes salaries, travel, supplies, MACOM program management, TJAG support, and any other mission-funded costs.

D Supervision & Review (S&R) / Supervision & Administration (S&A) (prior year)

Exclusively for S&R and S&A on projects funded in previous fiscal years. Current year S&R and S&A receives same priority as project. This category is NOT intended for "in house" support.

H Fines and Penalties

For fines and penalties that have been approved in the budget.

Note: The budget year is FY+2

N Remedial Action Operations (RA(O)) and Long-term Monitoring (LTM)

Funding for long-term remedial action operations. This category includes long-term monitoring in support of a DA-approved ROD or other decision document. This also includes 5-year relooks.

U NPL Sites with Signed ROD.

This category includes all work at sites with a ROD signed by all parties of the FFA/IAG.

V NPL Sites w/IAG and Regulator Approved Schedules

Projects under this category must be necessary to satisfy IAG requirements. This category should not be used for discretionary projects within the IAG framework. This category can also be used for projects at NPL sites with a Proposed Plan and ROD under preparation but not yet signed. ROD signature must be scheduled for the current year to receive this priority.

X High Potential for Off-Post Contamination

This category should be used when contamination has been confirmed at or in close proximity to the installation boundary, and has a high potential to migrate off post. This is for investigation/cleanup of the off post contamination and for the site or sites suspected of causing the contamination.

Y RAB Support

This category is used for installation administrative support for Restoration Advisory Boards (RAB)s. This category is not to be used for other community relations activities such as public meetings and must have a specific EPR report identifying RAB support requirements.

Z Notice of Violation (NOV), Consent Orders/Agreements

This category is to be used for efforts under Consent Orders/Consent Agreements to resolve NOV's or other enforcement actions for failure to perform a DERA-eligible restoration activity, i.e., RCRA corrective action, UST removal, or state laws. All NOV's MUST be properly reported to SFIM-AEC-EC and SFIM-AEC-IR in order to obtain this priority. Narrative must include NOV date.

c Non-NPL Remedial Actions

For remedial actions at non-NPL sites with approved decision documents.

e NPL Sites w/IAG but No Regulator Approved Schedule

f NPL Sites with no IAG

g Non-NPL Sites on NPL Installations with IAGs

h RCRA Corrective Action at Chem Demil Installations

Studies at installations where chemical demilitarization is part of the designated mission and requirements are identified in the corrective action section of a RCRA permit. All corrective action sections of RCRA permits must be reported to SFIM-AEC-RPO.

i RCRA Corrective Action at non-Chem Demil Installations

Studies at installations with requirements identified in the corrective action section of a A permit without a chemical demilitarization mission. All Corrective Action sections of RCRA permits must be reported to SFIM-AEC-RPO.

k Special Considerations

- Non-NPL Sites on NPL Installations without IAG
- Proposed NPL Installations without IAG
- Compliance with State restoration laws, permits or licenses with restoration requirements

m Continuity Projects - Normal Progression

This category refers to installations or sites where there is no Federal or State regulator driving a project, but where previous work has been done and information is available which justifies further progression. The normal IRP progression of PA/SI, RI/FS, RD/RA, and monitoring is followed.

4.0 ELIGIBLE LEGAL DRIVERS FOR THE OBLIGATION PLAN:

- A FFAs at NPL and proposed NPL installations.
- B IAGs (2 & 3 party) at non-NPL installations.
- C RCRA permits with CA requirements.
- D RCRA CA orders issued by EPA or state.
- E Consent Orders under state laws.
- H Notice of violation requirements.
- L Imminent threats.
- O PAs for installations listed on the Docket.
- P RA(O)/LTM for in-place systems for installations w/out agreements.
- Q State laws/regulations requiring a response within a specified period.
- Z No agreement

5.0 ELIGIBLE MILESTONES FOR THE OBLIGATION PLAN

- 1 Statement of work.
- 2 RI/FS work plan/sampling and analysis plan.
- 3 Community relations plan.
- 4 Engineering evaluation/cost analysis.
- 5 Action memorandum for a removal action.
- 6 RI/RFI report.
- 7 FS/CMS report.
- 8 Proposed plan.
- 9 ROD/CA decision document.
- 10 60% remedial design.
- 11 Final remedial design.
- 12 Remedial action plan (inc. O&M plans and remedial action schedules).
- 13 Treatability studies.
- 14 Begin cleanup.
- 15 Continue cleanup.
- 16 Complete cleanup.

ATTACHMENT D

Generic Memorandum of Agreement

ATTACHMENT D

MEMORANDUM OF AGREEMENT
BETWEEN
(EXECUTOR) AND (INSTALLATION)
RELATING TO PROCEDURES FOR THE (INSTALLATION)
DEFENSE ENVIRONMENTAL RESTORATION PROGRAM

I. PURPOSE: The purpose of this memorandum is to specify the roles and responsibilities for cooperation and extent of support which the (EXECUTOR) will provide (INSTALLATION) in the environmental investigation, design and clean up of selected sites at (INSTALLATION), (STATE) under the Defense Environmental Restoration Program (DERP).

This memorandum will arrange for the (EXECUTOR) to provide technical assistance, contract management, and related services required by (INSTALLATION) to execute specific Army Active Sites Installation Restoration Program (IRP) tasks. All tasks will be performed by the (EXECUTOR) in accordance with Army IRP and installation guidance, prepared in consultation with appropriate regulators and completed, to include interim deliverables, by installation negotiated deadlines.

This memorandum does not replace assigned responsibilities to current laws, regulations and Army policy and guidance under the DERP.

II. AUTHORITY:

A. Commander, (INSTALLATION) is responsible for environmental restoration of sites on the installation and maintains final authority for all proposed action decisions.

B. Commander, (INSTALLATION) assigns project execution to the (EXECUTOR) for activities required for environmental restoration. Examples of required activities are project planning documents, preliminary assessments, site inspections, site investigations, remedial investigations, feasibility studies, remedial designs, remedial actions, and development of long term operation and maintenance requirements.

C. The DERP provides for the clean up of Department of Defense (DOD) hazardous waste sites consistent with the provisions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Section 211, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR 300) and Executive Order 12580, Superfund Implementation. The DERP is funded by a special Army transfer account, the Defense Environmental Restoration Account (DERA) established by 10 USC 2703.

D. The IRP is a comprehensive program to identify, investigate and clean up contamination associated with past Army activities using DERA funds. The IRP is conducted consistent with the process described in the NCP, 40 CFR 300.61-300.70, and if applicable, consistent with the substantive requirements of the Resource Conservation and Recovery Act (RCRA) corrective action process. The IRP will comply with federal, state, regional and local requirements applicable to the clean up of hazardous materials contamination.

III. RESPONSIBILITIES:

A. The (EXECUTOR) will:

1. Assign a Project Manager to be the primary point of contact between (INSTALLATION) and the (EXECUTOR) for execution of (EXECUTOR's) portion of the (INSTALLATION) IRP. The (EXECUTOR) Project Manager will serve under the authority and direction of the (INSTALLATION) Remedial Project Manager (RPM) in accordance with specific tasks.
2. Provide estimates of costs and time requirements for performance of specific tasks forwarded by the (INSTALLATION) RPM. The estimates will include in-house costs, specific contract and pricing data, and costs charged for contract supervisory and administrative services.
3. Propose schedules for all deliverables and accomplish all tasks within time deadlines set forth by (INSTALLATION). Tasks will not be considered complete until reviews are prepared for all work performed and accepted by the (INSTALLATION) RPM.
4. Obtain the concurrence of the (INSTALLATION) RPM on all interpretations of statutes and regulations cited by either party to this agreement that may effect performance of a task.
5. Recognize the (INSTALLATION) RPM as the sole point of interface with all environmental regulators, report any contacts by regulators immediately to the (INSTALLATION) RPM and attend all meetings as directed by the (INSTALLATION) RPM.
6. Provide (INSTALLATION) RPM any and all available information on a task, as requested.
7. Immediately notify the (INSTALLATION) RPM of any impediment to completion of a task on or before the scheduled deadline and at or below the stated costs.
8. Provide information as requested by the deadline set forth in the request, or seek and obtain an extension.

9. Request from (INSTALLATION) specific approval before release for publication of any information gathered under this agreement. The (EXECUTOR) will not release any information concerning the (INSTALLATION) restoration program to parties outside this agreement without written approval from (INSTALLATION).

B. (INSTALLATION) will:

1. Assign a Remedial Project Manager (RPM) designated by the Commander, (INSTALLATION) to ensure all work is accomplished in accordance with regulatory, DOD and Army policy. The (INSTALLATION) RPM will be the primary point of contact between the (INSTALLATION) and the (EXECUTOR). The (INSTALLATION) RPM will assign tasks to the (EXECUTOR) describing the general scope of activities and provide project criteria, goals and general milestones for restoration work.

2. Program necessary funds through Environmental Program Requirements (EPR) reports with estimates of cost and time requirements for performance of specific tasks forwarded by the (EXECUTOR) Project Manager.

3. Approve proposed schedules and deadlines for all tasks and deliverables. Provide comments and approvals to the (EXECUTOR) on items such as scopes of work and project documents in accordance with approved schedules.

4. Provide guidance to the (EXECUTOR) concerning all interpretations of statutes and regulations cited by either party to this agreement that may effect performance of a task and document any deviations from DOD or Army policy. The (INSTALLATION) RPM is responsible for obtaining concurrence with the major Army command (MACOM) and major subordinate command (MSC) of any deviations from policy and guidance.

5. Communicate and negotiate with environmental regulators and be the sole point of interface with all regulators. The (INSTALLATION) RPM will invite the (EXECUTOR) to attend regularly scheduled meetings with regulators and other meetings as appropriate.

6. Provide all necessary available project information to the (EXECUTOR) Project Manager to ensure task completion.

7. Coordinate with the (EXECUTOR) Project Manager to resolve any impediment to completion of the task on or before the stated deadlines and at or below the stated costs. If the (EXECUTOR) fails to meet a deadline resulting in a penalty to the Army, the (INSTALLATION) RPM is responsible for notifying their MACOM and the U.S. Army Environmental Center (USAEC) (the Army's central program manager for the IRP) of the penalty and any associated costs.

8. Provide the (EXECUTOR) Project Manager with guidance on additional tasks not identified in the general scope of assigned activities. If a task is time critical, the (INSTALLATION) RPM will so state with reasons and establish a suspense date for a response.

9. Coordinate and communicate with the MACOM/MSC. The (INSTALLATION) RPM will:

(a) submit Installation Action Plans (IAPs), Defense Sites Environmental Restoration Tracking System (DSERTS) updates, EPR reports and related changes to the MACOM/MSC,

(b) coordinate meetings for MACOM/MSC attendance, and

(c) provide copies of schedules and deliverables as appropriate.

10. Develop and revise IAPs in coordination with the (EXECUTOR) Project Manager or assign the in-house development of the IAP and the annual update of the document to the (EXECUTOR) Project Manager.

11. Update the DSERTS with input from the (EXECUTOR).

12. Execute the Community Relations Program, develop a Restoration Advisory Board (RAB), chair the Technical Review Committee and establish and maintain the public repository and administrative record as appropriate.

13. Provide appropriate funds, in coordination with their MACOM/MSC, to the (EXECUTOR) for all work required to accomplish the tasks. (INSTALLATION) is responsible for implementation of DERA eligible projects, including funding the requirements and reporting through the USAEC, in accordance with Army policy and guidance.

IV. FUNDING

A. DERA funds are distributed to Army appropriations from an Army Transfer Account. Within the Army, all DERA eligible tasks are prioritized in accordance with RRSEs and the Army priority system. When the task is ready for award, (INSTALLATION) will request the MACOM direct funds via a Military Interdepartmental Purchase Request (MIPR) or Work Authorization Document/Funding Authorization Document (WAD/FAD) to the financial point of contact at the (EXECUTOR).

B. The requirement for the payment or obligation of funds under this agreement is subject to the availability of appropriated funds, and no provision herein shall be interpreted to require obligation or payment of funds in violation of the Anti-Deficiency Act, 31 U.S.C. 1341. In cases where payment or obligation of funds would constitute a violation of the Anti-Deficiency Act, the dates established requiring the payment or obligation of such funds shall be appropriately adjusted.

V. EFFECTIVE DATE, AMENDMENT AND TERMINATION:

A. The terms of this agreement shall apply to and be binding upon signature to this agreement and be in effect for a period of 5 years from the last signature date. Two years after implementation, all parties will determine whether the agreement should continue. Upon mutual agreement of all parties, the agreement can be extended by amendment for a period of time not to exceed 5 years.

B. This agreement may be modified by mutual consent of all parties or may be terminated by (INSTALLATION) or the (EXECUTOR) with a thirty day written notice to the other party, except for critical activities which require a longer period of time. A critical activity is defined as an activity undertaken by the (EXECUTOR) for (INSTALLATION) for which (INSTALLATION) has a pressing need which cannot be satisfied within a thirty day period. In the event of termination of this agreement by (INSTALLATION), (INSTALLATION) shall reimburse the (EXECUTOR) for all reasonable costs (including costs related to terminating outstanding obligations) incurred by the (EXECUTOR) to the extent that such costs have not been previously reimbursed.

VI. RESOLUTION OF DISPUTES:

The below signed parties will work to successfully implement this agreement in their respective organizations. Disputes under this agreement will be resolved, if possible, by the (INSTALLATION) RPM and the (EXECUTOR) Project Manager. Unresolved issues will then be raised to the Commander, (INSTALLATION) and (EXECUTOR) Commander/District Engineer (or equivalent for other government agencies). If agreement cannot be made, the Commander, (INSTALLATION) is the final arbiter of any unresolved disputes.

VII. APPROVING PERSONNEL:

INSTALLATION

Installation Commander Date

Chief, Environmental Office Date

EXECUTOR

Commander/District Engineer Date
(or equivalent for other government agencies)

ATTACHMENT E

USAEC Oversight Mission Statement

ATTACHMENT E

U.S. ARMY ENVIRONMENTAL CENTER ENVIRONMENTAL RESTORATION OVERSIGHT MISSION STATEMENT

SUBJECT: The U.S. Army Environmental Center (USAEC) Restoration Oversight Mission

1. **Purpose:** The purpose of this Statement is to define the restoration oversight mission assigned to USAEC by the Assistant Chief of Staff for Installation Management (ACSIM).

2. **Mission:**

a. The USAEC is a Field Operating Agency under the direction of the ACSIM. Pursuant to AR 200-1, the USAEC provides a broad range of program management, oversight, and technical support for the implementation of the Army's environmental program in support of Headquarters, Department of the Army (HQDA), major Army commands (MACOMs), and installations. The USAEC works within the guidance of the ACSIM on all environmental restoration issues.

b. The USAEC is the HQDA Program Manager for the Installation Restoration Program (IRP) and provides management and integration of the planning, programming, and budgeting of the environmental restoration requirements for the Army. They also provide oversight of the program. The scope of mission activities includes, but is not limited to, those examples that apply to the IRP provided in paragraph 4.

c. The USAEC provides oversight of the Base Realignment and Closure (BRAC) environmental restoration requirements for the Army. The scope of mission activities includes, but is not limited to, those examples that apply to BRAC provided in paragraph 4.

3. **Tasking Authority:**

a. **Major Tasking:** Major tasking of both USAEC and the MACOMs for program-wide actions (such as major data calls) will be made in writing by the ACSIM. The ACSIM may task USAEC as the action office to consolidate and report MACOM actions.

b. **Time-critical and/or Project-Specific Tasking:** The ACSIM may request that USAEC gather and report MACOM and installation information on a time-critical and/or project-specific basis. The USAEC will then directly contact the MACOMs on behalf of the Department of Army Staff (ARSTAF) or the Army Secretariat.

4. Mission Implementation: Execution of the USAEC oversight mission involves four major elements: Fiscal, Reporting, Program Assistance, and Policy and Guidance.

a. Fiscal. The USAEC will:

(1) Develop and manage the work plans for the BRAC and IRP active sites by using site-level data to build a prioritized, unconstrained program.

(2) In conjunction with the MACOMs, confirm Defense Environmental Restoration Account (DERA) eligibility. Establish IRP funding levels based on legal requirements, relative risk, re-use, and policy guidance.

(3) In conjunction with the MACOMs and BRAC Office, provide advice on BRAC funding levels based on legal requirements, re-use, relative risk, and policy guidance.

(4) Brief the work plans through HQDA staff for approval and to obtain Deputy Assistant Secretary of the Army (DASA) concurrence; distribute the signed Plans, revise quarterly, and distribute revisions.

(5) Review financial information to assess appropriate use of resources.

b. Reporting. The USAEC will:

(1) Assess DOD reporting and management requirements, consider comment from MACOMs and provide recommendations to the ACSIM.

(2) Collect, review, prepare, and present fiscal and site and project data to support periodic program reporting and management requirements.

(3) Maintain the Army-level Defense Site Environmental Restoration Tracking System (DSERTS), the Army's primary means of restoration data collection, to meet upward reporting requirements and to manage the Army's environmental restoration programs.

(4) Consolidate MACOM DSERTS data submissions and review for completeness and consistency with Army Guidance.

(5) Maintain selected documents from the installation Administrative Records to enable the ARSTAF to do five-year reviews and historical queries.

(6) Provide annual data calls and key events schedule at the beginning of the fiscal year.

c. Program Assistance. On behalf of the ARSTAF, the USAEC will:

(1) Review program documents (e.g., Installation Action Plans and BRAC Cleanup Plans) and program actions to identify trends and problem areas that require Army-wide guidance.

(2) All USAEC involvement with installations will be coordinated with the MACOMs.

(a) Involvement in technical, administrative and fiscal details and issues of specific installations will only occur:

- when suggested or warranted by program or financial indicators
- when directed by the ACSIM; or
- when requested by a MACOM; and
- on a frequency sufficient to assess the implementation of policy and report on program status to the ACSIM.

(b) On selected installations, review project documents for general completeness (to include technical adequacy and cost effectiveness of approach), and adherence to DOD and HQDA policy, standards, and guidance. The USAEC may attend Technical Review Committee (TRC), Restoration Advisory Board (RAB), and BRAC Cleanup Team (BCT) meetings and communicate all issues of mutual concern with the MACOMs. Interact with the responsible MACOM, installation, executing agency, and HQDA staff to resolve problems.

(3) At the direction of the ACSIM, research, obtain data from MACOMs, analyze, advise, and report on program and project-specific issues.

(4) Participate in and respond through the Office of the Director of Environmental Programs (ODEP) or BRAC Office, and ACSIM, to the General Accounting Office (GAO), U.S. Army Audit Agency (USAAA), DOD Inspector General (IG), and other auditors to identify and address systemic Army environmental issues and notify the MACOMs, as appropriate.

(5) Review key documents (e.g., Records of Decision (RODs), Finding of Suitability to Transfer (FOST), Finding of Suitability to Lease (FOSL)), in accordance with current HQDA policy.

(6) In conjunction with MACOMs, provide oversight of installation compliance with Federal Facilities Agreement (FFA) and RODs to enable the ARSTAF to better ascertain legal requirements for budget/Program Objective Memorandum (POM) development and reporting.

(7) Upon request from a MACOM, provide program assistance to the MACOM or its installations. As resources permit, the USAEC will:

(a) Attend MACOM program meetings and selected installation-level meetings on an "as needed" basis and in coordination with MACOM environmental staff.

(b) Provide advice and technical review of studies, project reports, and designs, advice during restoration activities, and advice on innovative technologies.

d. Policy and Guidance. The USAEC will:

(1) Assist the ARSTAF in reviewing DOD environmental restoration policy and represent the ARSTAF on environmental restoration committees and at meetings.

(2) Draft and staff, as necessary, Army program policy, guidance, procedures, protocols, and instructions for execution of the Army environmental restoration program at active and BRAC installations.

(3) Monitor general compliance with overall HQDA policy and guidance and report to the ACSIM.

(4) Assist installations, MACOMs, and executing agencies in the interpretation of program policy and guidance, as required.

(5) Develop and provide training on program management, technical and regulatory information, as well as "lessons learned."

(6) Support value-added program initiatives that promote reduction in restoration costs (e.g., natural attenuation, innovative technologies, National Priorities List delisting).

ATTACHMENT F

**Decision Document Outline
and Example**

ATTACHMENT F

DECISION DOCUMENT OUTLINE

1. PURPOSE

This decision document describes the selected action to ____ (state action) _____ at the _____ (name of site) _____ at _____ (installation) _____, chosen in accordance with the CERCLA as amended by the SARA, the NCP, RCRA, and AR 200-1, as applicable.

Give a brief description of the site, including DSERTS number, type of operation that caused a release, dates the site operated, and the hydrogeologic setting. Also, briefly describe the nature and extent of contamination and how the site proposes a risk to human health and the environment. State what action/remedy has been selected and how the selected action will eliminate or reduce the risk to human health and the environment.

This removal/interim remedial/remedial action alternative was selected by _____ (installation) _____, with support from _____ (State or USEPA) _____.

2. SITE RISK

Give a brief description of the results of any risk assessments or risk considerations at the site. Discussion should, at a minimum, address exceedence of state and Federal maximum contaminant levels for the given media of concern, exposure pathways, known or potential health or ecological effects of contaminant, and overall risk which could result from the contamination at the site if no remedial action were taken. Do not include relative risk site evaluations as a measure of risk for a decision document.

3. REMEDIAL ALTERNATIVES

Briefly describe the remedial alternatives considered, the selected remedial alternative, and provide an explanation/rationale of why the remedial method was selected and the expected goals or long-term effectiveness of the remedy.. State negotiated cleanup levels/goals and any planned remedial action operations and monitoring.

If desired, or deemed necessary, reference any technical documents supporting this decision, i.e., "The alternative(s) summarized here are described in the remedial investigation and feasibility study (RI/FS) report dated _____ which should be consulted for a more detailed description of all the alternatives".

4. PUBLIC/COMMUNITY INVOLVEMENT

At a minimum, describe what steps were taken to involve the public in the selection of the remedy. Unless an emergency situation exists, as defined by the removal action criteria in the NCP, part 300.415(b) (2), the public is afforded an opportunity to review and comment on any proposed remedial action.

5. DECLARATION

See attached declaration statements. Choose the declaration statement that best describes the site and situation.

6. APPROVAL AND SIGNATURE

Re-state the selected alternative, the total cost of the action and the appropriate approval authority for the action. The appropriate approval authority is based on the cost of the action described in the decision.

- a. The ACSIM, approves all DDs greater than \$6 million..
- b. The MACOM commander approves DDs between \$2 million and \$6 million.
- c. The Installation Commander approves DDs less than \$2 million.

DECLARATION STATEMENTS-SECTION 5

1. When the selected remedy satisfies the statutory preference for treatment as a principal element, by treating at least the principal threat(s) posed by the site, the declaration should state:

"The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this interim remedial action (or removal) [or "a waiver can be justified for the Federal or State applicable or relevant and appropriate requirement that will not be met"], and is cost effective. This remedy satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility or volume as a principal element and utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable."

2. When the selected remedy for the site involves little or no treatment to reduce toxicity, mobility or volume of contaminants, that is, treatment is not utilized to address the principal threat(s) posed by the site, CERCLA requires a statement explaining why such a remedial action is not chosen. The declaration in this case should state:

"The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this interim remedial action (or removal) [or "a waiver can be justified for the Federal or State applicable or relevant and appropriate requirement that will not be met"], and is cost effective. This remedy utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable for this site. However, because treatment of the principal threats of the site was not found to be practicable [or "within the limited scope of this action"], this remedy does not satisfy the statutory preference for treatment as a principal element of the remedy." This must be followed by the rationale for this finding based on the specific factors used to determine that treatment is either impracticable or not within the limited scope of this action. In addition, a brief statement that past or future operable units will meet the statutory preference for treatment should be included when appropriate.

3. If the remedy will leave hazardous substances on-site above health-based levels, the Declaration should include the following:

"Because this remedy will result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, a review will be conducted within five years after commencement of remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment."

4. If the remedy will not leave hazardous substances on-site above health-based levels, the Declaration should include the following:

"Because this remedy will not result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, the five-year review will not apply to this action".

**EXAMPLE
DECISION DOCUMENT FOR A
SOIL REMOVAL**

**COOLVILLE ARMY DEPOT,
ALABAMA**

1. PURPOSE

This decision document describes the selected action to remove contaminated soils at the Acid Pond site at Coolville Army Depot, Alabama. This action was chosen in accordance with the CERCLA as amended by the SARA, the NCP, RCRA and AR 200-1, as applicable.

The Acid Pond site (DSERTS number CVAD-13) contains two unlined ponds surrounded by earth berms located within a heavily wooded area. The ponds were in operation from 1949 until 1973. It is reported that the ponds received acid wastes from batteries, shell de-rusting operations, and approximately 17,000 mustard-filled projectiles (155mm) from a reconditioning operation in 1955. A tributary to Lake Eric drains to the south along the base of the slope west of the ponds. Lake Eric is the water supply for Coolville Army Depot.

Elevated levels of arsenic, cadmium, chromium, lead, selenium in soils, surface water and ground water near the site indicate that contamination is migrating from the Acid Pond site. Given the close proximity of the Acid Pond site to the installation water supply (Lake Eric), the decision was made to remove the contaminated soils (the source of contamination to the surface water and ground water), regrade the site, and monitor the ground water.

This removal action alternative was selected by the Army with support from the Alabama Department of Environmental Management and the Region IV, U.S. Environmental Protection Agency (USEPA).

2. SITE RISK.

Investigation of this site began in 1982. At that time low levels of zinc and nitrite/nitrate were detected in ground water and chromium and lead were detected in downgradient surface-water samples. In 1989, maximum concentrations of arsenic, cadmium and chromium in soil from the site exceeded risk-specific dose values for carcinogens. Ground water at the site also exceeded state and federal maximum contamination levels for chromium, lead and selenium. In 1994, continued investigation determined that concentrations of contaminants increased in surface water and ground water.

Area drainage from the Acid Pond site occurs primarily by surface runoff into a tributary west of the ponds that drains south into Lake Eric. Lake Eric is located approximately 800 feet from the Acid Pond site. Potential receptors of contamination from the Acid Pond site are installation personnel (from the water supply provided by Lake Eric), employees working near the site, cattle, deer and small game animals, as well as aquatic life.

3. REMEDIAL ALTERNATIVES

Remedial alternatives proposed from the Corrective Measures Study and the Interim Remedial Action Study for the Acid Pond site were:

– No Action. This action does not prevent the continued migration of contaminants from the soil to the surface water and groundwater, therefore, the potential risk of exposure through the installation water supply remains. Potential exposure to installation personnel working near the site and exposure to the ecology also remains.

– Institutional controls (site fencing and monitoring). This action would provide adequate protection of facility personnel working near the site and to several ecological factors, however, since the source of contamination would remain as well as the migration pathways, the installation water supply remains a potential exposure pathway. Potential exposure to aquatic life would also remain.

– Multi-layer cap and institutional controls (site fencing and monitoring). This action would provide adequate protection of facility personnel working near the site and large land animals. This action would decrease water infiltration at the site and possibly reduce leachate generation. Since the source of contamination would remain, the installation water supply remains a potential exposure pathway. Potential exposure to aquatic life would remain but would be reduced. Monitoring would have to be long-term due to the proximity of the Lake Eric water supply.

– Soil removal and limited institutional controls (monitoring). This action would consist of removing and disposal of contaminated soil and regrading the Acid Pond site. Institutional controls would be limited to monitoring the groundwater and surface water. This action would eliminate the source of contamination and thereby be protective of any exposure to humans, animals and aquatic life. With the removal of the source, the groundwater contaminant concentrations should naturally attenuate.

The alternative selected for remediation of the Acid Pond site is soil removal with limited institutional controls. As the site characterization, risk assessment and study of alternatives have been completed for this site, it is planned that this action will be the final remedial action for this site. Cleanup levels in soil of 1 ppb for chromium, 3 ppb for cadmium and 5 ppb for arsenic as well as 5 ppb for lead and selenium were negotiated with the USEPA and the State of Alabama. Groundwater and surface water monitoring will occur annually for three years after completion of the removal.

4. PUBLIC/COMMUNITY INVOLVEMENT

Coolville Army Depot has a Community Relations Plan. In accordance with the Community Relations Plan, a public notice will be placed in the local newspaper announcing the remedial activities to be completed at the Acid Pond site.

5. DECLARATION

The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this removal action, and is cost effective. This remedy satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility or volume as a principal element and utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable. Because this remedy will not result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, the five year review will not apply to this action.

6. APPROVAL AND SIGNATURE

The selected alternative for the Acid Pond site is soil removal and limited institutional controls. The total cost of this action is estimated at \$1 million. The appropriate approval authority for this action is the Coolville Army Depot Installation Commander.

APPROVED BY:

W. H. JONES
Colonel, CM
Commanding

ATTACHMENT G

List of Available IRP Guidance

ATTACHMENT G

LIST OF AVAILABLE IRP GUIDANCE

1. Army Regulation 200-1, Environmental Protection and Enhancement, Headquarters, Department of Army, 23 April 1990 (Currently being revised).
2. Memorandum, ODUSD(ES), 14 Apr 94, subject: Management Guidance for Execution of the FY 94/95 and Development of the FY96 Defense Environmental Restoration Program (Currently being updated).
3. U.S. Army Installation Restoration Program Guidance Manual, U.S. Army Environmental Center, December, 1993, 2nd Revision.
- 4a. Policy and Guidance for Identifying U.S. Army Environmental Program Requirements, U.S. Army Office of the Director of Environmental Programs, 20 Dec 1995.
- b. 1383 Data Base Management (DB1383), User's Manual DB1383 Version 2.71, U.S. Army Environmental Center, 7 Apr 93.
- 5a. The Defense Site Environmental Restoration Tracking System User's Guide, U.S. Army Environmental Center, Sep 96.
- b. The DSERTS Army Guidance Manual, U.S. Army Environmental Center, Sep 96.
6. Memorandum, USAEC, SFIM-AEC-IRP, 11 Mar 96, subject: FY96 Guidance for Required Installation Action Plans (Currently being updated).
7. Relative Risk Site Evaluation Primer, ODUSD (ES), Summer 1996 (Revised Interim Edition).
8. Memorandum, USAEC, SFIM-AEC-IRP, 24 May 94, subject: Suggested Memorandum of Agreement (MOA).
9. Memorandum, ACSIM, DAIM-ED-R, 18 Nov 95, subject: Revised Interim Policy for Staffing and Approving Decision Documents (DDs).
- 10a. Memorandum, USAEC, SFIM-AEC-RPM, 23 Oct 96, subject: Army Guidance Concerning Restoration Advisory Boards.

b. **Restoration Advisory Board Workshop Guidebook; A Strategy for Implementing the Joint Department of Defense and U.S. Environmental Protection Agency Guidelines on Restoration Advisory Boards, Summer 1994.**

c. **DoD and USEPA Restoration Advisory Board Implementation Guidelines, September 1994.**

d. **Memorandum, ASA(IL&E), 7 May 96, subject: Issuance of Army Policy - The Role of Restoration Advisory Boards (RABs) in Environmental Cleanup.**

e. **Final Report of the Federal Facilities Environmental Restoration Dialogue Committee; Consensus Principles and Recommendations for Improving Federal Facilities Cleanup, April 1996.**

11. Guidelines for the Coordination of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Activities Between the Agency for Toxic Substances and Disease Registry and the Department of Defense, February 1995.