

DERP Forum

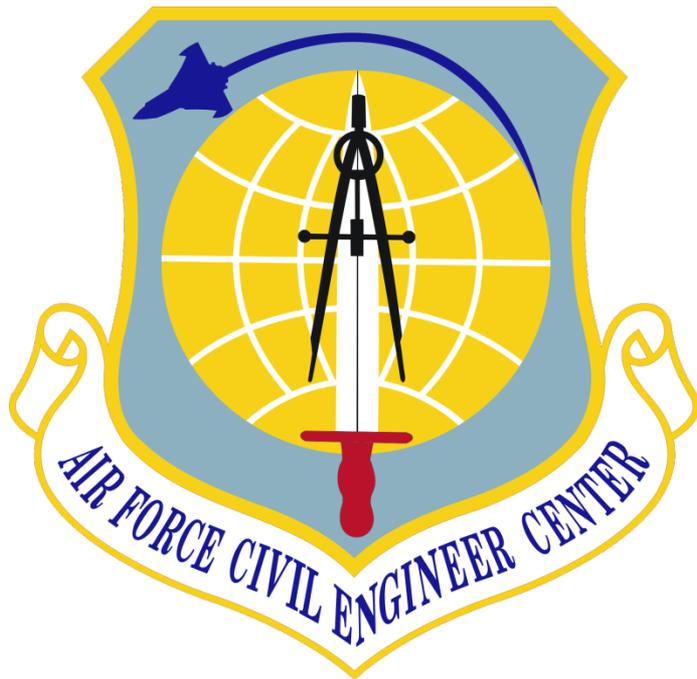
Strengthening Relationships with our Regulatory Partners

St. Louis, Missouri

May 8-9, 2019

Air Force Civil Engineer Center

Integrity - Service - Excellence



Managing Complex Sites in a Complex Program: Remediation Challenges

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High Visibility Challenges

- **“Big picture” challenges get major focus**
 - Significant time, attention, deliberation
 - Shared by many/most bases
 - Robust policy, guidance, cross-feed, working groups, conferences, technical groups, USAF/DoD initiatives, etc.
- **Examples**
 - Dense Non-Aqueous Phase Liquids
 - Emerging Contaminants
 - Records of Decisions/Statements of Basis
 - Public Involvement/Restoration Advisory Board
 - Optimization

Site or Project-Specific Challenges

- **Common and recurring themes with site/project-specific twists**
- **Minor issues can turn into major failure points, if not addressed**
 - **Utility Requirements**
 - **Underground Utilities**
 - **FAA & Flightline Issues**
 - **Sensitive Habitat**
 - **Endangered Species**
 - **Cultural Resources**
 - **Weather**
 - **Old Infrastructure & Infrastructure Improvement**
 - **Backfill Quality/Testing**
 - **Building Demo Uncertainties**
 - **Local User Coordination**
 - **Security Coordination**
 - **Anthropogenic Background**
 - **Shallow Aquifer: Dewatering**
 - **“No dig” – Mission Constraints**
 - **Mission Support, Planning, Construction Review**
 - **Nearby Construction/MILCONs**

Programmatic or Administrative Challenges

- **Identifying “Site-Related” vs “non-Site-Related” contamination – Regulatory agreement**
- **Commercial Users & Tenants – Environmental liability**
- **Site/Contract Uncertainties**
- **Contract “Stretch” goals**
- **Balancing workload & schedule – Regulatory, DoD, Contractor**
- **Knowledge of applicable regulations, especially where regulations lag advancing technology**
- **BRAC vs active Sites under same Federal Facility ID**

Case Study: Petroleum Site



- **Sub-slab contamination required building demolition**
 - Significant asbestos
 - Disposal of interior equipment
 - Real Property coordination – 1354
 - McKinney Act
- **Coordination with MILCON project on adjacent property complicated demo & remediation**
- **Backfill issues**
 - Passed analytical testing
 - Contained trash – suspected spoil



Ancillary factors can turn technically “simple” Sites/contaminants into complicated projects!

Case Study: Re-Use

- **6 major new launch operations sited in areas with residual contamination**
- **Ensuring that remediation can co-exist**
- **Managing well inventory**
- **Communicating controls/uncertainties**
- **Coordinating potentially MASSIVE dewatering and grading efforts**
- **Managing the aftermath of mishaps:**
 - Sep 2016 “anomaly”
 - ERP Site (land use controls)
 - Operator is responsible for cleanup
 - USAF still property owner/permittee



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