

Army

Environmental

Cleanup

Strategy

April 2003

Army Environmental Cleanup Strategy

Foreword

I am pleased to present the Army's Environmental Cleanup Strategy. The Strategy provides a roadmap to guide the Army in attaining its environmental cleanup vision. It also establishes common objectives for ensuring consistency and accountability across the Army's cleanup program.

The Cleanup Strategy demonstrates our sustained commitment to address contamination resulting from past operations, and supports the objectives of Army Transformation. The Cleanup Strategy is an enduring document that will direct the development and implementation of future strategic plans.

As we look to the future, we must continue to emphasize performance based cleanup activities that protect human health and the environment while ensuring Army's lands are available to support our mission.

Mario P. Fiori

Army Environmental Cleanup Strategy

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ARMY ENVIRONMENTAL CLEANUP STRATEGY

Overarching Vision for Army Environmental Cleanup

The Army will be a national leader in cleaning up contaminated land to protect human health and the environment as an integral part of its mission.

The Army's *Overarching Vision for Environmental Cleanup* communicates its commitment to cleaning up past environmental contamination for which the Army is responsible. The Army Environmental Cleanup Strategy (Strategy) is a roadmap to guide the Army in attaining its environmental cleanup vision. The Strategy complies with the Government Performance and Results Act and uses the ISO 14001 Environmental Management System Standard as a framework.

The primary purpose of this Strategy is to identify common objectives for creating consistency and accountability across the Army's Cleanup Program. This Strategy supports the Army Environmental Program and Army Transformation, and it demonstrates the Army's sustained commitment to addressing contamination resulting from past operations. Formerly, the Army managed its cleanup programs under the separate environmental "pillars" of compliance and restoration. This Strategy provides overarching guidance to all cleanup personnel—regardless of the program driver or funding source—indicating that cleanup to protect human health, public safety, and the environment is an integral element of supporting the Army mission. This cleanup strategy is in addition to, but separate and distinct from, the Army Environmental Strategy, which includes other environmental programs such as conservation and pollution prevention.

This document defines the Army's cleanup vision, identifies uniform cleanup program objectives, describes the various Army cleanup program areas, provides a mission statement for each program area, and briefly describes cleanup resource and strategy management. Another document, the Army Environmental Cleanup Strategic Plan, provides a framework for implementing this Strategy and identifies specific objectives, targets, success indicators, reporting mechanisms, and management review processes for each cleanup program area. Program area managers (program managers) develop specific guidance and procedures for managing the cleanup

Cleanup Program Areas

- *Army Active Installation Restoration*
- *Army Excess Installations Restoration*
- *Army Base Realignment and Closure Cleanup*
- *Formerly Used Defense Sites*
- *Army Compliance-Related Cleanup*
- *Army Special Installation Cleanup*
- *Army Remediation Overseas*

program in accordance with this Strategy and in coordination with the Director of Environmental Programs, Assistant Chief of Staff for Installation Management (ACSIM).

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

Overarching Objectives for the Cleanup Program

Nine objectives have been defined for the Environmental Cleanup Strategy, as follows:

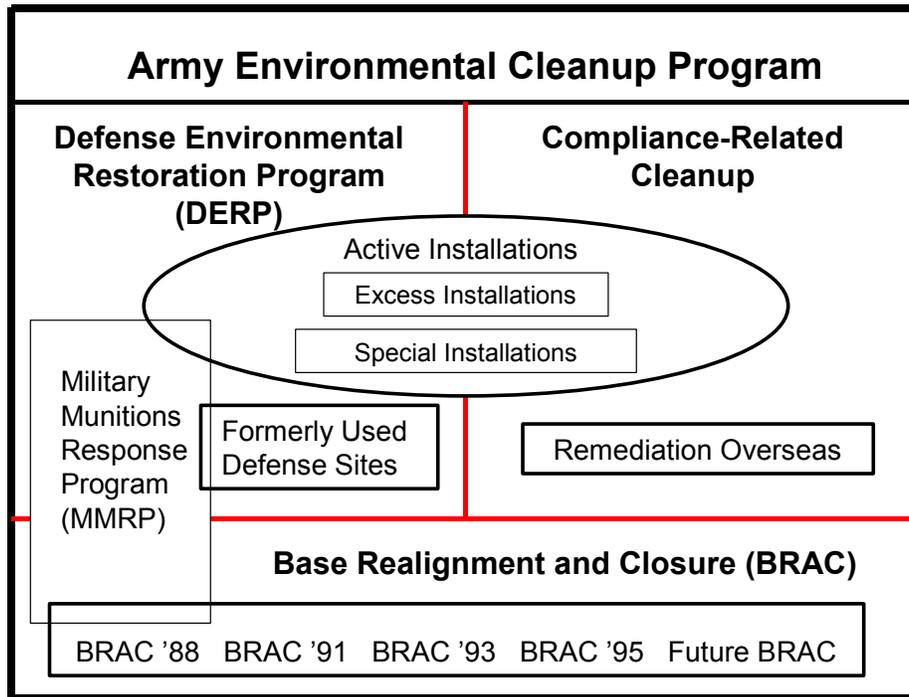
1. Ensure prompt action to address imminent and substantial threats to human health, public safety, and the environment.
2. Conduct appropriate, cost-effective efforts to identify, evaluate, and, where necessary to protect public safety or human health and the environment, conduct response actions to address contamination resulting from past DOD activities. Maintain relevant cleanup information in a permanent archive.
3. Comply with statutes, regulations, executive orders, and other external requirements governing cleanup.
4. Ensure that Army regulations, policies, and guidance are developed within the framework of this Strategy.
5. Plan, program, budget, and execute cleanups in accordance with DOD and Army directives and guidance using validated, auditable, site-level data.
6. Develop cleanup partnerships with appropriate federal, Tribal, state, local, territorial, or host-nation authorities.
7. Promote and support public stakeholder participation in the cleanup process, as appropriate, and make site-level cleanup information available to the public.
8. Support the development and use of cost-effective cleanup approaches and technologies to improve program efficiency.

9. Perform semiannual program management reviews of cleanup progress against established targets, and conduct periodic reviews of sites where contamination remains in place.

Cleanup Program Areas and Program Drivers

The cleanup program areas addressed in this strategy include cleanup efforts that previously were conducted separately under the restoration and compliance programs. In a 9 April 2003 memorandum, the Assistant Secretary of the Army (Installations and Environment) directed the Army staff to manage these programs under a unified vision and overarching strategy. Figure 1 depicts the differences and commonalities between the cleanup program areas.

Figure 1: Army Environmental Cleanup Program



Site cleanups are conducted as restoration activities under the Defense Environmental Restoration Program (DERP) or as compliance-related cleanup activities (non-DERP). The determining factor has been when operations that resulted in contamination took place. The DERP was established on 17 October 1986 in 10 USC Section 2701, *et seq.* to address contamination caused by Army activities. DOD policy has been that contamination that occurred after the DERP was established was not eligible for inclusion in the DERP. As a result, environmental cleanups may be only DERP-related (as with FUDS), only

compliance-related (as with overseas remediation), or either (active installations, excess installations, special installations, or BRAC sites). The Military Munitions Response Program (MMRP) is clearly related to cleaning up contamination from the past, but for this Strategy, the MMRP is developed and executed as an integral part of other program areas. The program areas are described below.

1. *Army Active Installation Restoration*

Army active installation restoration addresses contamination at active Army installations under the DERP. The mission for Army active installation restoration is to perform appropriate, cost-effective cleanup so that the property is safe for installation use and to protect human health and the environment.

2. *Army Excess Installation Restoration*

Army excess installations are active installations that are excess to Army needs. The Army intends to dispose of these sites once cleanup issues have been addressed, but these installations are not subject to Base Closure and Realignment legislation.

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

3. *Army BRAC Cleanup*

The Army Base Realignment and Closure (BRAC) program was established to meet requirements of the Base Closure and Realignment Act of 1988 and the Defense Base Closure and Realignment Act of 1990, as amended. BRAC cleanup is funded under the BRAC account (a subset of the Military Construction appropriation) and is conducted under DERP authority.

The mission for BRAC cleanup is to perform appropriate, cost-effective cleanup so that the property is safe for transfer and projected reuse, and to protect human health and the environment.

4. *Formerly Used Defense Sites*

The Formerly Used Defense Sites (FUDS) program was established under the DERP to clean up properties that were under the jurisdiction of the Secretary of Defense and owned by, leased to, or otherwise possessed by the United States at the time of actions leading to contamination or safety hazards caused by DOD. The Army is the executive agent for the FUDS program, and USACE executes the program.

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

5. *Army Compliance-Related Cleanup (non-DERP)*

The Army conducts cleanup of contamination resulting from operations that have occurred since October 1986 at active, BRAC, excess, and special installations. Compliance-related cleanup is conducted in accordance with a number of environmental laws and regulations.

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

6. *Army Special Installation Cleanup*

Special installations are those where compliance-related cleanup is accomplished using either mission funds or working capital funds. Both DERP- and compliance-related cleanups are conducted in this program area.

The mission of Army special installation cleanup is to perform appropriate, cost-effective cleanup at Army installations to provide property that is safe for Army use, to sustain operations and training, and to protect human health and the environment.

7. *Army Remediation Overseas*

The Army's remediation overseas addresses cleanup requirements and standards at Army installations located outside of the United States. Overseas remediation has been managed under the Army's environmental compliance program. DOD Instruction 4715.8, "Environmental Remediation for DOD Activities Overseas," is the driver for Army remediation overseas.

The cleanup mission at overseas locations is to remediate contamination that presents imminent and substantial endangerment to human health and public safety, was caused by past Army operations, and is located on or is emanating from an Army installation or facility. Additional mission elements to be considered are retaining mission/operational capability, maintaining installation access, protecting human health and the environment, and complying with applicable international agreements.

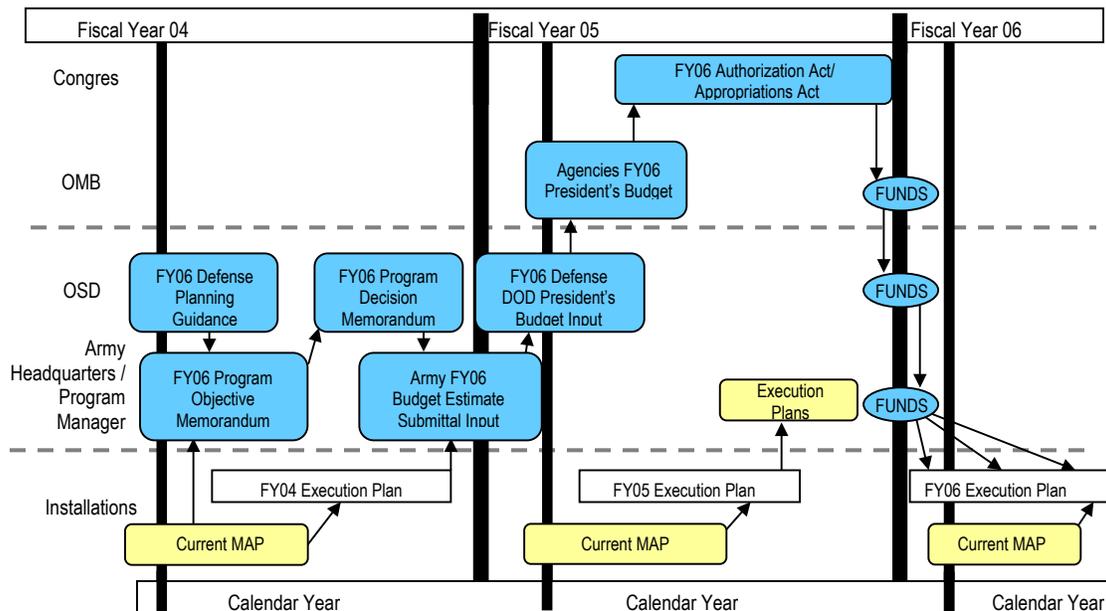
Resource Management for Army Environmental Cleanup

Development of the Army cleanup budget begins at the site level and builds to Army headquarters. The cleanup budget process consists of the following interrelated phases: planning, programming, budget development, and program execution. Figure 2 illustrates this process.

Planning

The Defense Planning Guidance (DPG) provides the overall framework for Army budget development. The Financial Management Regulation (FMR) establishes DOD goals. Using DOD and Army guidance, each installation (or USACE District for a FUDS property) develops site-level requirements and a Management Action Plan (MAP) [active Army installations have an Installation Action Plan (IAP); BRAC installations have a BRAC Cleanup Plan (BCP); and FUDS have a property-specific MAP]. In coordination with public and regulatory stakeholders, the installation (or USACE District) reviews and updates its MAP at least annually to reflect changes in priorities, availability of funding, additional information on cleanup sites, policies, legislation, and performance measures.

Figure 2: The Cleanup Budget Process



Note: The fiscal years are shown for illustration purposes only; the budget process is an ongoing process from year to year.

The best opportunity for stakeholder involvement and input in the Army cleanup process occurs at the installation level during the annual MAP review and update. At that time, the installation identifies new requirements or revalidates continuing requirements. Program managers use MAP information to report requirements as well as to plan and program future funding.

Programming

Army headquarters staff elements use requirements identified in the MAP to prepare input to the *Program Objective Memorandum (POM)*. The POM is a mid-range plan covering a 6-year timeframe that demonstrates how the Army will achieve cleanup program objectives as well as all other Army objectives. After deliberations and programmatic decisions, the Army develops and submits the *Budget Estimate Submittal (BES)* to the Office of the Secretary of Defense (OSD) for review and approval. The timeframe associated with the development of each year's budget encompasses several years. For instance, the identification and updating of the environmental cleanup requirements for the fiscal year 2006 (FY06) budget will occur from calendar years 2002 through 2004.

Budgeting

The President's Budget is a 2-year budget based on the BES. Continuing with the previous example, the President will submit the FY06/FY07 budget to Congress in early calendar year 2005 (CY05). The FY07 budget requirements will follow a similar process, and the President will submit his FY07/FY08 budget request to Congress in early CY06.

Execution

Congress provides authority to perform cleanup in the Defense and Military Construction Authorization Acts and funds to complete authorized work in the Defense and Military Construction Appropriation Acts. The Army is responsible for reviewing requirements, determining relative priority among competing requirements, ensuring appropriate stakeholder input to the cleanup process, and allocating funds to subordinate units to execute the program. Part of the Army's program oversight responsibility is to monitor the obligation of funds for fulfilling commitments such as civilian pay, investigation contracts, and cleanup contracts, along with monitoring the payment of funds to contractors.

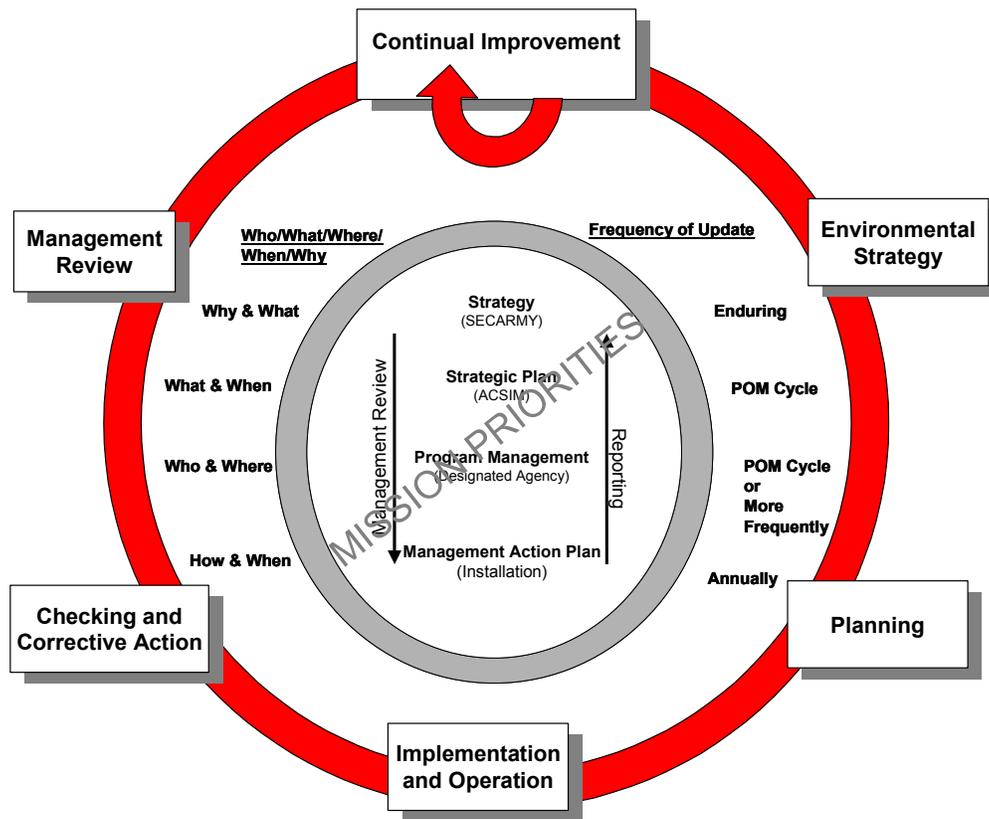
Cleanup Strategy Management

The Army will implement this Strategy in alignment with its mission priorities using the ISO 14001 process depicted in Figure 3. This process entails five steps as described below.

Environmental Strategy

Headquarters elements of the Army Secretariat and Army Staff develop a comprehensive Strategy (this document) encompassing all cleanup program areas under a unified vision and overarching objectives. Strategy development occurs in consultation with the program managers for each cleanup program area and is used as Army input to the Defense Planning Guidance.

Figure 3: Cleanup Strategy Management Process



Planning

Program managers for each cleanup program area establish guidance and procedures for implementing the Strategy within their respective program area in consultation with the Headquarters Department of the Army Staff and relevant installations or USACE districts. Guidance and procedures include direction concerning MAP preparation for use by installation or USACE district project managers. Stakeholders may provide input to Army project managers. Program managers also prepare input to the programming and budgeting process described earlier.

Implementation and Operation

Installations or USACE districts execute cleanup in accordance with guidance and procedures for their respective program area and consult and coordinate with federal and state regulators throughout the cleanup process. Public members of Restoration Advisory Boards (RABs) provide advice concerning the cleanup process.

Checking and Corrective Action

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

Management Review

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

Outreach for Army Environmental Cleanup

The Army involves the local community in the environmental cleanup process as early as possible, and seeks continued community input until cleanup is complete. Each installation or FUDS develops and uses a Community Relations Plan defining a comprehensive stakeholder involvement program to be implemented during environmental cleanup activities. Each installation or USACE district responsible for FUDS also designates a point of contact (POC) for environmental cleanup activities and related community inquiries or comments. A similar POC exists at the installation or FUDS Headquarters organization.

RABs are focal points for public and regulatory participation in the Army's cleanup programs. RABs provide a forum for the exchange of information among members of the local community and representatives of the installation, the US Environmental Protection Agency (EPA), and state, local, and Tribal governments. RABs have installation and community co-chairs. Together, they develop meeting agendas and ensure that appropriate issues are raised and discussed.

Installations or FUDS with cleanup being conducted in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Contingency Plan (NCP) have an Information Repository that provides the public with information about environmental restoration activities at the installation or FUDS. The Information Repository is typically at a location near the site that is easily accessible to the public, and information is available for inspection at times convenient to the public. The Information Repository includes information from the Administrative Record (the documents that form the basis for the selection of a response action) for active installations, BRAC sites, or FUDS as required under the NCP, as well as other documents pertinent to cleanup activities.

Just as the Army reaches out to public stakeholders, it seeks to involve regulatory stakeholders early in the cleanup process and maintain lines of

communication throughout the process. Regulators have a role in remedy selection as well as regulatory oversight until the response is complete. For BRAC sites, regulatory representatives participate on BRAC Cleanup Teams (BCT). Issues that cannot be resolved at the installation level move up respective chains of command until resolution occurs.

Although several opportunities are available for stakeholder involvement and input in the Army cleanup process, the best opportunity occurs at the installation level during the annual MAP review and update, when new requirements are identified and continuing requirements are revalidated.

The Army is proud of its environmental cleanup program and its accomplishments. This strategy will build on these accomplishments and provide a framework for the Army to meet future environmental cleanup challenges, even as the Army transforms with a changing world and a changing environment. Cleanup to protect human health, public safety, and the environment is an integral element of supporting the Army mission.

Acronyms

ASA(I&E)	Assistant Secretary of the Army for Installations and the Environment
BES	Budget Estimate Submittal
BCT	BRAC Cleanup Team
BRAC	Base Realignment and Closure
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CTT	Closed, Transferred, or Transferring (ranges)
CY	Calendar Year
DERP	Defense Environmental Restoration Program
DOD	Department of Defense
DOE	Department of Energy
EPA	Environmental Protection Agency
FUDS	Formerly Used Defense Site
FY	Fiscal Year
GSA	General Services Administration
HQDA	Headquarters, Department of the Army
IAP	Installation Action Plan
IRA	Interim Remedial Action
ISO	International Organization for Standardization
MAP	Management Action Plan
MILCON	Military Construction
MMRP	Military Munitions Response Program
NCP	National Oil and Hazardous Substances Contingency Plan
NPL	National Priorities List
ODEP	Office of the Director, Environmental Programs
OMB	Office of Management and Budget
OSD	Office of the Secretary of Defense
POM	Program Objective Memorandum
PRP	Potentially Responsible Party
RA	Remedial Action
RAB	Restoration Advisory Board
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
TPS	Third Party Site
USACE	US Army Corps of Engineers
USC	United States Code

Glossary

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

BRAC Cleanup Plan – A plan that documents the status of and plans for cleanup activities at BRAC installations. The BRAC Cleanup Plan abstract is an executive summary of the plan and is updated annually.

Decision Document – General term for documentation of removal or interim remedial action (IRA) and remedial action (RA) decisions undertaken in accordance with CERCLA and the NCP. Includes Action Memoranda, Interim Records of Decision (RODs), and Records of Decision.

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

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

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

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

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

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

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

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

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

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

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