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