



Interim Actions in the Defense Environmental Restoration Program

Interim actions enable the Department of War (DoW) to quickly reduce immediate threats to human health and the environment from releases of hazardous substances, pollutants, or contaminants. Interim actions can be implemented at any point in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process that DoW must follow when conducting Defense Environmental Restoration Program (DERP) cleanups.

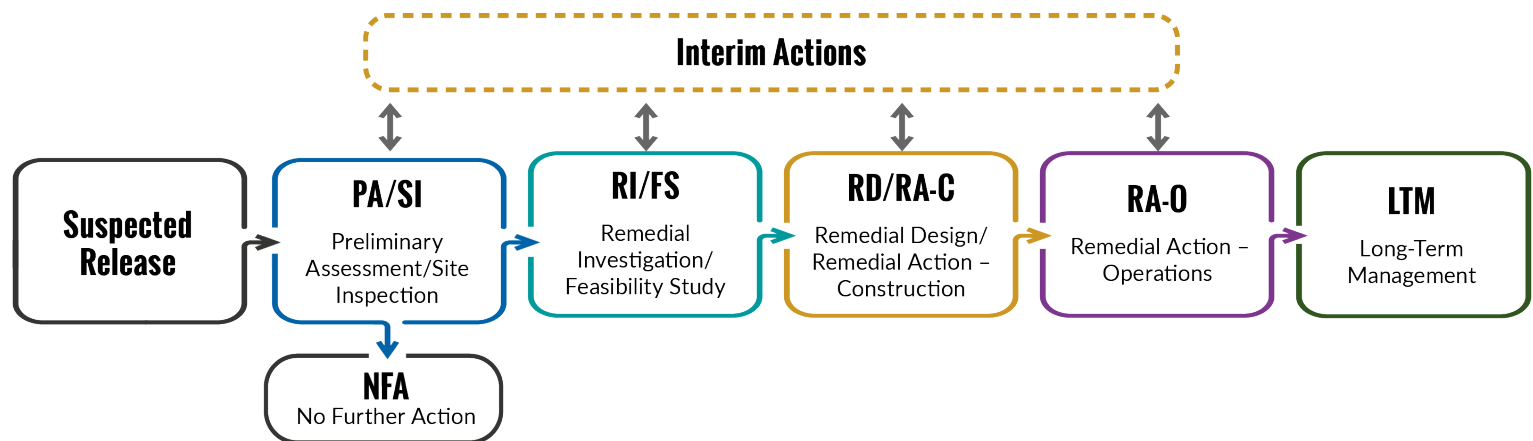
What is the Defense Environmental Restoration Program?

DERP is how the DoW investigates and cleans up releases of hazardous substances, pollutants or contaminants, and munitions from past military activities at active installations, Base Realignment and Closure (BRAC) locations, Formerly Used Defense Sites (FUDS) properties, and National Guard facilities in the United States.

Please see DoW's fact sheet about the [DERP](#) for additional information.

What is the Comprehensive Environmental Response, Compensation, and Liability Act?

CERCLA is the Federal law that DoW follows to investigate and clean up releases of hazardous substances, pollutants, and contaminants in the United States when past Department activities are the source of the release. The CERCLA process has many steps that may take several years, sometimes decades, to complete, and it provides a consistent, science-based approach to cleanup across the nation. The CERCLA process results in a final cleanup remedy that addresses unacceptable risk at a cleanup site, which is then managed to ensure long-term effectiveness. It includes the following phases, with opportunities for interim actions along with Federal and State environmental regulator review and for public participation throughout.



U.S. Department of War

DEFENSE ENVIRONMENTAL RESTORATION PROGRAM

Protecting Human Health and the Environment

Distribution Statement A. Approved for public release: distribution is unlimited. POC: ODASW(EM&R).



Interim Actions in the Defense Environmental Restoration Program

What is an interim action?

If at any time during the CERCLA process it is discovered that a DoW release, or threat of a release, of hazardous substances, pollutants, or contaminants results in an immediate threat to human health or the environment, DoW may implement a short-term solution called an interim action. Interim actions are used to quickly prevent, minimize, or mitigate impacts or damage to human health or the environment, when necessary. DoW focuses on interim actions that provide a response to the specific threat, such as removing and disposing of impacted soil to prevent exposure or migration of hazardous substances to groundwater, constructing a fence or taking security precautions to limit access to a site, and providing connections to public water systems or whole house filters when drinking water is impacted.

When are interim actions implemented?

Interim actions can occur at any time during the CERCLA process. There is no single criterion for whether an interim action is necessary because each site and release is unique. Whether an interim action is needed at a site depends on specific conditions at the site. The decision to implement an interim action requires the professional determination of DERP's environmental team and careful review of the site data along with authorities provided in CERCLA. It is not based on a single data point (e.g., chemical concentration, existence of a drinking water well).

Are interim actions part of every DoW cleanup?

An interim action is used if an immediate threat to public health or the environment is identified. They are not required for all sites going through the DoW cleanup process. As a result, not all releases, including per- and polyfluoroalkyl substances (PFAS) in groundwater and soils, will result in interim actions. For example:

- The groundwater impacted by a release is not a drinking water source (e.g., water is brackish or contains naturally occurring high levels of dissolved minerals such as arsenic, fluoride, manganese, and iron).
- There is no exposure pathway for impacted soils (e.g., contamination is physically prevented from getting into the groundwater). For example, the affected soils may be covered, in an area with restricted access, far from the water table, or have limited ability to transmit water.

If an interim action is not appropriate for a site, that site will continue to be investigated and addressed through the CERCLA process.

Additionally, DoW only has the authority under the DERP to respond to releases that result from Department activities. If a release presents an immediate threat to human health and the environment, but DoW is not the source or the only source of that release, DoW cannot conduct an interim action or any cleanup under the DERP. Please see DoW's [Cleanups and Potentially Responsible Parties](#) fact sheet for additional information.

Is an interim action the final cleanup remedy?

Interim actions typically do not incorporate the extensive analyses used to identify and select a final cleanup remedy. They also may not provide the protection or permanence afforded by a final cleanup remedy, as their primary goal is to mitigate risk as quickly as possible. When additional cleanup is necessary after an interim action is implemented, the site will continue through the CERCLA cleanup process. However, the interim action may become part of the final remedy based on the analysis and coordination involved in the cleanup process.



U.S. Department of War

DEFENSE ENVIRONMENTAL RESTORATION PROGRAM

Protecting Human Health and the Environment

Distribution Statement A. Approved for public release: distribution is unlimited. POC: ODASW(EM&R).