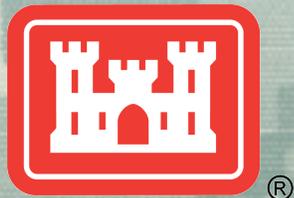


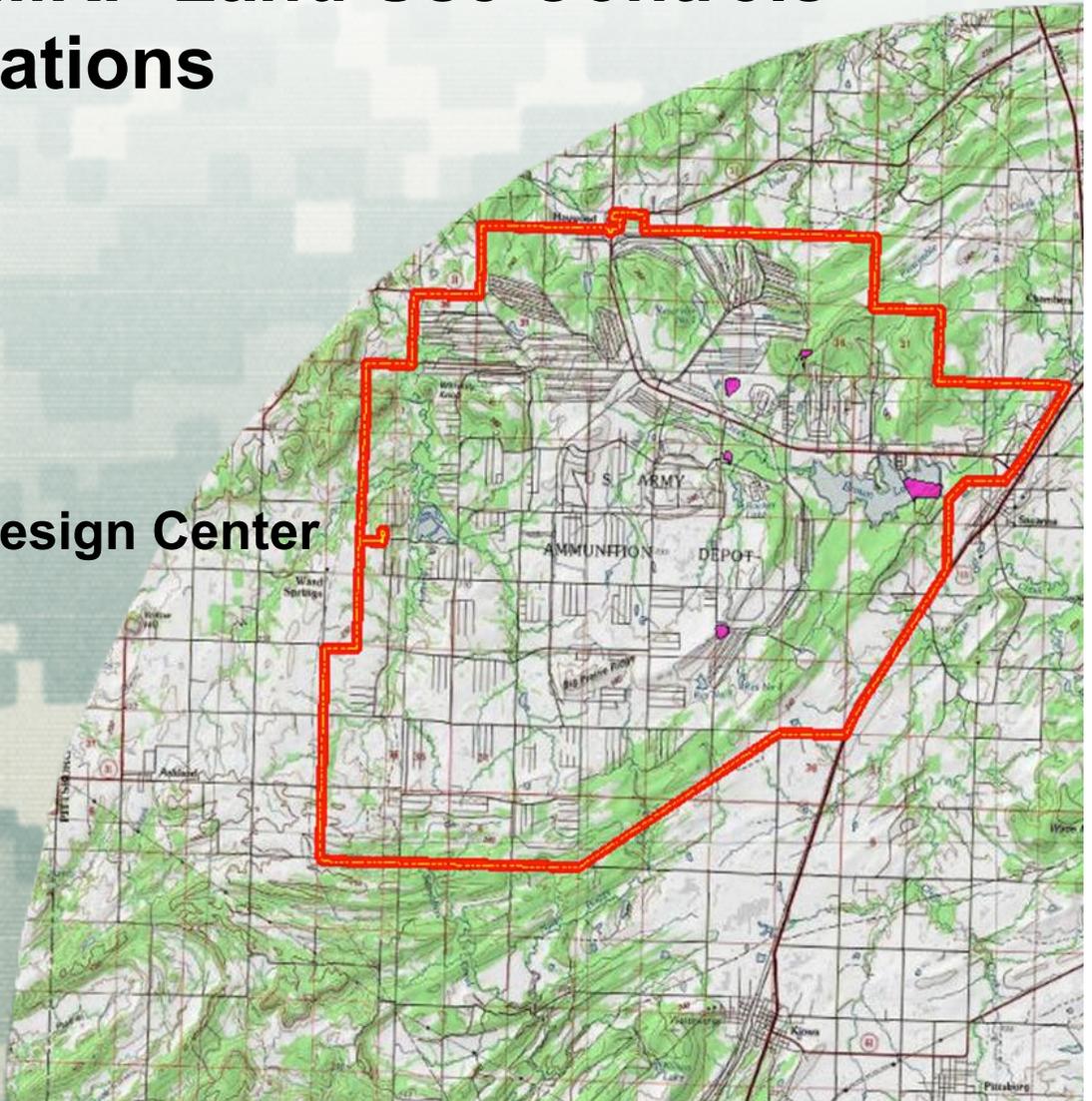
Implementing Non-Time Critical Removal Actions for Interim MMRP Land Use Controls at Active Army Installations

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Overview

- Background
- Purpose
- Execution
- Interim Land Use Controls
- Lessons Learned



Background

- MMRP Site Inspections (SI)
 - ▶ Conducted 2003 – 2010
 - ▶ MRSs recommended for further investigation
 - ▶ Potential explosive safety hazard

- Requirements
 - ▶ CERCLA, 40 CFR Part 300.415
 - ▶ Defense Environmental Restoration Program (DERP)
 - ▶ DoD Ammunition and Explosives Safety Standards - DoDI 6055.09M



Purpose

- Implement Interim Land Use Controls for all MRSs being Evaluated under the Active MMRP
 - ▶ Minimizes potential for exposure to explosive safety hazard and/or potential MC until final remedy is implemented
 - ▶ Focuses on preventing exposure (human health)
 - ▶ Does not apply to transferred MRSs (property not owned by DoD)
 - ▶ Unilateral decision by the Army to implement



Execution

- **Non-Time Critical Removal Action**
 - ▶ Selected based on time-sensitivity, complexity, comprehensiveness, and cost
 - ▶ Includes
 - ▶ Army only Kick-off Meeting
 - ▶ TPP Meeting with Stakeholders/Regulators
 - ▶ Engineering Evaluation/Cost Analysis (EE/CA) with Public Notice
 - No Action – Alternative 1
 - Land Use Controls – Alternative 2
 - ▶ Action Memorandum (AM)
 - ▶ Land Use Control Plan (LUCP) with Public Meeting, if requested



Interim Land Use Controls

- Basis for Selection, Specific to each MRS
 - ▶ SI Conceptual Site Models (CSMs)
 - ▶ Current land-use
 - ▶ Guidance from installation

- Types of Land Use Controls
 - ▶ Institutional controls
 - Land use restrictions/notations in master planning documents/dig permits
 - Public advisories
 - ▶ Engineering controls
 - Markers or signs
 - Fences
 - Guards
 - ▶ Other measures
 - Annual inspections
 - Environmental self audit



Lessons Learned

1. Contract Award

- ▶ Original scope for 52 installations without installation involvement
 - Scope reduced to 26 installations
 - LUCs mechanism already in place
 - Post –SI investigations recommended NFA
 - Recommend coordinating with installation prior to contract award
- ▶ Period of Performance
 - Initially one year from Notice to Proceed
 - Significant delays in excess of 2 years

2. Document Templates

- ▶ Templates exist for EE/CA, Action Memorandums, and Land-Use Control Plans
- ▶ Use templates for consistency
- ▶ No templates for annual inspections or environmental self audits
 - Specific to each installation
 - Installation can implement as appropriate



Lessons Learned

3. Regulatory Involvement

- ▶ Unilateral decision by the Army to implement an IRA
- ▶ Seeking regulatory concurrence, not acceptance
 - Not required to sign the Action Memo, installation specific
 - Army may elect to not address a regulatory comment
- ▶ Clarification of LUCs as interim, not final measures
- ▶ Document review delays
 - Ensure review times are adequate per the installation during the TPP meeting
- ▶ Interim LUCs may be included within the final remedy

4. Installation Involvement

- ▶ Project not a priority
- ▶ Document review delays
- ▶ Offer significant insight and knowledge regarding the application of LUCs.
- ▶ Delays caused by staffing , specifically the Garrison Commander's signature for the Action Memorandums



Lessons Learned

5. EE/CA Preparation

- ▶ NTCRA requires an EE/CA
- ▶ In accordance with CERCLA
- ▶ Allows for public comment of an interim action

6. Pre-existing Land Use Controls

- ▶ Installations-wide LUCs versus interim MMRP LUCs
- ▶ Overlap of IRP LUCs versus interim MMRP LUCs

7. Off-post, Army leased property

- ▶ Typically lease agreements with state agencies
- ▶ Interim MMRP LUCs may be applied
 - Application specific to lease agreements and may require legal review



Lessons Learned

8. Public Perception/Involvement

- ▶ Installation concern for highly publicized sites
- ▶ To-date no public comments received on the EE/CA (18 of 26 installations)
- ▶ To-date no request for a separate public meeting, though interim LUCs have been discussed at RABs

9. Implementation and Funding for Interim MMRP LUCs

- ▶ Army is only performing the NTCRA
- ▶ Implementation is the installation's responsibility
- ▶ Installation can request other DERP funds for implementation



Questions or Comments?

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