MMRP Site Inspections at FUDS – Challenges, Status, and Lessons Learned

June 20, 2007
Denver, CO
• **Formerly Used Defense Sites**
  
  *FUDS are properties that were formerly owned, leased, possessed by, or otherwise under the jurisdiction of the DoD or military prior to 1986*

• **Goal**
  
  *Reduce risk to human health and the environment through implementation of effective, legally compliant, and cost effective response actions*

• **Customer**
  
  - Property owners and communities affected by these sites

• **Engineer Regulation 200-3-1 (ER 200-3-1)**
  
Congress established the Formerly Used Defense Sites (FUDS) Program in 1986

US Army Corps of Engineers manages FUDS Program for Department of Defense (DoD)

Local geographic Corps districts manage FUDS within their boundaries
Scope of FUDS Program

Total Number of Properties Requiring Response Actions: 2,965
Data: FY04 DERP Annual Report to Congress

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- Northern Mariana Islands 19
- Palau (PT) 0
- Puerto Rico (PR) 25
- U.S. Virgin Islands (VI) 6
- American Samoa (AS) 8
- Guam (GM) 16
Scope of FUDS Program
(Data Source: 2006 Report To Congress)

Properties:
• Total in Inventory 9,908
• Eligible for FUDS Program 6,868
• No DoD Action Indicated (NDAI) 3,824
• Requiring Response Actions 3,044

Projects:
• Total in Properties Requiring Response Actions 4,653
• No DoD Action Indicated (NDAI) 799
• Total with costs incurred or planned 4,229
• Total with costs in FY06 & Beyond 3,333

FY07 Cost To Complete (CTC) - $18.7B
• MMRP $12,647M (1,364 projs)
• HTRW $3,144M (837 projs)
• OTHER $37M

FY07 Approved Workplan - $253.7M (CRA)
• CON/HTRW $247M (900 projs)
• BD/DR $50M (91 projs)
• PGM MGT $2,628M
The FUDS Process

FUDS CERCLA (Superfund/NCP) Implementation Strategy

Preliminary Assessment (PA)
Inventory Project Report and Archive Records Search

- No DOD Action Indicated (NDAI)
- Time Critical Removal Action (TCRA) - Action Memorandum
  Non-Time Critical Removal Action - Engineering Evaluation/Cost Estimate

Site Inspection (SI)
Identify sites for further or future action and characterize release

- No DOD Action Indicated
- Time Critical Removal Action - Action Memorandum
  Non-Time Critical Removal Action - Engineering Evaluation/Cost Estimate

Remedial Investigation/Feasibility Study (RI/FS)
- RT characterizes site to develop a Conceptual Site Model (CSM)
- FS uses the CSM to develop and evaluate alternatives for remedy selection

- No DOD Action Indicated
- Treatability Studies, Operate Pilot Scale Systems

Proposed Plan (PP)
Summarizes the proposed remedial alternative

Record of Decision (ROD)/Decision Document
Identifies the remedial alternative chosen, detailed assessment of RI/FS data

- Remedial Design (RD)
  Detailed designs, plans, specifications for remedial action
  Requires an approved Explosive Safety Submission

- Remedial Action (RA)
  Construction and Operation Phases

Response Complete (RC)
Cleanup objective as defined in ROD is done

- Long Term Management (LTM)
  Of site may be required for the response action

Five Year Reviews
Determine if implemented response is still protective
# The FUDS Process – .zip file version

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Introduction to the MMRP  
Site Inspections

- DoD established goal of completing all MMRP SIs by end of FY10 (Navy, Air Force, Army, and FUDS)
- USACE ER 200-3-1 requires Corps to use Remedial Process framework for MMRP and to work IAW with CERCLA/NCP
- FUDS Inventory of sites needing SI is based on the 2004 Annual Report to Congress
MMRP FUDS – SI Phase

- CERCLA Site Inspection Phase initiated FY05
- USACE anticipates SIs for approximately 1000 projects (765 completed by FY10)
- Budget for SIs: $125M for FY05 - FY10
- Conducted only on FUDS eligible projects
- Address potential MEC and MC hazards
- If separate HTRW concerns are observed during SI, FUDS geographic District is notified
Program Objectives - The Performance Work Statement

- **Objective**
  - “The objective of the MMRP SI is to determine whether the individual project sites within the FUDS program warrants further response action or no Department of Defense action indicated (NDAI)”

- **Regulatory Guidelines**
  - CERCLA and NCP
  - Engineer Regulation 200-3-1 and DoD Management Guidance for the Defense Environmental Response Program (DERP)
**Program Objectives – ER 200-3-1**

- Confirm presence of MEC or MC contamination identified in the PA phase on ranges or other MMR areas identified in the ASR or range inventory efforts
- Collect appropriate information necessary to:
  i. Eliminate from further consideration those releases that pose no significant threat to public health or the environment
  ii. Determine potential need for removal action
  iii. Collect or develop additional data, appropriate for Hazard Ranking System (HRS) scoring by EPA; and
  iv. Collect data, as appropriate, to characterize release for effective and rapid initiation of remedial investigation and feasibility study (RI/FS)
- Secondary objective
  - Collect data to complete the Munitions Response Site Prioritization Protocol (MRSPP)
SI Project Delivery Team Members

- **Military Munitions Center of Expertise (MM CX)**
  - Overall program management of the SI's and subject matter expertise regarding MEC and MC
- **HTRW CX**
  - Subject matter expertise regarding MC
- **MM and Chemical Warfare Materiel (CWM) Design Centers**
  - SI execution, separated by US Army Installation Management Agency (IMA) regions
- **FUDS Geographic Districts**
  - Conduct overall project management activities
- **Regulators and Stakeholders**
  - Provide input and help develop the Data Quality Objectives (DQO)
Design Center Execution Responsibilities vs. IMA Regions

- HNC MM DC – Southeast and Pacific
- NWO MM DC – Northwest
- NAB MM DC – Northeast
- SPD Range Support Center - Southwest

Overseas: Europe
- Korea
Site Prioritization For Completing SI

- FY05 sites prioritized based on MM CX request to Divisions
  - Requested a variety of MMRP projects (bombing ranges, artillery ranges, OB/OD, small arms)
  - Requested projects needed to provide a wide range of concerns (coastal ranges, desert ranges, heavily vegetated, with variety of terrains)
- FY08-FY10 sites being scheduled now based on District/Division/HQ/Regulator input
FUDS MMRP SI Current Status

- Four Task Orders awarded 26 May 05
- Execution is 18 months per project funded
- Fixed-Price Performance Based Contract
  - Four payment milestones
- All FUDS MMRP projects are identified in the Task Orders
- 328 projects have been awarded to date
Challenges

• Numerous property owners
  – A pride of lions, a covey of quail, a business of ferrets; an entropy of property owners

• Volume and schedule
  – 765 FUDS SI’s
    • Each SI comprised of 2 TPP workshops, 4 deliverables, field work
  – Complete by 2010
Challenges
Lessons Learned

• Launching national initiative while program framework is still evolving
  – ‘You SI with the program you’ve got, not the program you want’

• Inconsistencies in FUDS program
  – ER 200-3-1, May 2004
  – Property eligibility; project category

• Volume of deliverables
  – Straining resources at all levels
  – Incorporating ‘global’ changes

• Effective communications
  – Swift and thorough dissemination is critical
  – EKO
Lessons Learned – cont’d

• Performance Based Contract
  – One of largest PBCs
  – Control vs responsibility; culture change
• Rights of Entry
  – Can never start too early
  – Simplified ROE form
• Programmatic tasks embedded in initial project schedules
• Public Involvement
  – Engage primary stakeholders early
Ordnance Safety

Remember the 3Rs of UXO Safety!

- DO NOT TOUCH!
- DO NOT MOVE!
- Note/record location
- Call 911 or local law enforcement
Questions?

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