

Overview of Air Force Restoration Program – FY 00 and Beyond
Lt Col Ray Knight, HQ USAF Restoration Chief

Lt Col Knight provided a corporate overview of the Air Force (AF) environmental restoration program. He reviewed how the AF is structured and explained our relationship with the AF and Department of Defense (DoD) leadership in the environmental business. Lt Col Knight discussed the AF vision, goals and commitments to the AF restoration program. He focused on how the principles and recommendations from the Federal Facilities Environmental Restoration Dialogue Committee (FFERDC) are used to shape the AF cleanup program. This topic led into a review of the AF budgeting process, the "Bottom-Up" aspect for requirement identification, and the importance of stakeholder involvement in the process. This process supports the AF stable funding request to DoD and Congress allowing the AF to establish long-range commitments to stakeholders based on FFERDC principles of "Risk plus other Factors". However, stable funding does not necessarily mean level funding. Program funding is vulnerable to congressional cuts and priority realignments. Lt Col Knight specifically addressed his support of DoD/State Memorandum of Agreement (DSMOA) and asked the states to help the AF demonstrate it "...is getting a return on this investment" in the DSMOA program. He concluded his presentation by identifying several challenges in the program and highlighted the upcoming AF partnering initiative.

QUESTION: Mr. Sims asked the regulators how many were aware of Air Force Goals. Various members of the audience stated that they were not aware of the goals prior to Lt Col Knight's presentation. Mr. Sims indicated that there are differences that need to be resolved, such as the definitions of Construction Completion between the AF and EPA, and the dates of similar goals. He stated that there needs to be a forum to look for ways to work together.

Overview of Air Force Base Conversion Agency – FY 00 and Beyond John Smith, HQ AFBCA Chief Environmental Programs

Mr. Smith discussed the differences between the environmental restoration program missions of the operational Air Force (AF) installations and those identified for closure under Base Realignment and Closure (BRAC) legislation. He provided an overview of the Air Force Base Conversion Agency (AFBCA) organizational structure and the chain of command with the added influence on the real property disposal mission and funding avenues. He echoed much of Lt Col Knight's presentation with a BRAC focus on the near-term goals of coordination on schedules and then invited the regulators to continue to participate in the quarterly reviews. He asked for participation in the long-term strategy through coordinated development of a roadmap to site closeout. Communication is absolutely required in order to accomplish AFBCA and stakeholder goals. He stated he would appreciate communication from the regulators, both the Environmental Protection Agency (EPA) and the states, when new laws are implemented. He said that part of this communication would be the participation by the regulators in the AFBCA Quarterly Reviews, which he invited all regulators to participate either in person or by teleconference. He emphasized that the AF support of DoD/State Memorandum of Agreement (DSMOA) and Full Time Equivalent (FTE) must continue. Mr. Smith reviewed other program initiatives to include the site closeout guide, optimization conference and work groups, and land use strategies.

Mr. Smith provided an overview of the Defense Planning Guidance (DPG) goals. He stated that the DPG goals are used as a measure, like an AFBCA report card. Part of these goals is to complete Last Remedy in Place (LRIP) constructions as soon as possible, with Record of Decisions (RODs) in place, and interim RODs as needed. There is an ongoing struggle between meeting the DPG goals and completing all reuse and transfer actions. He identified the competing goals between transfer and cleanup initiatives that stress the limited resources available within the AF and regulator communities.

A general overview and history of the budget issues was provided. The audience was asked to participate with the budgeting process and to provide comments. The regulators should submit letters that address funding approval or disapproval, so as to assist the AFBCA in this area.

Challenge

Personnel issues are a serious concern. Currently, the only available positions are temporary slots. It is difficult to fill these positions due to the nature of the mission.

Mr. Smith closed by providing the regulators with opportunities to continue and increase their involvement with the AF BRAC cleanup program.

EPA Region 5 Program Overview
David Wilson, Federal Facilities Branch

Mr. Tindall indicated that this is a great opportunity to get together and communicate with each other about the goals shared between the various parties.

The Environmental Protection Agency (EPA) Region 5 provided a review and current status of the federal facility program. It was noted that this program is mature and that all Remedial Investigation (RI)/Feasibility Study (FS) reports have been started. Record of Decisions (RODs) are needed at only 4 more Federal Facility National Priorities List (NPL) sites. Wright-Paterson AFB was highlighted as a significant accomplishment and is proud to be associated with this program.

EPA Region 5 offered its appreciation for the resource support from the Air Force Base Conversion Agency (AFBCA) and indicated that the same level of support is not provided by the other military services.

It was indicated that more Construction Completions have been completed in this Region than in any other region. Construction Completions are the number one priority for the Environmental Protection Agency. Construction Completion, however, does not mean the program is finished. Many sites, that have been classified as being Construction Completed, have groundwater pump and treatment systems or monitoring programs in place, and these may remain in service for some time.

Base Realignment and Closure (BRAC) funding will be ending after 2001. Eighty full time equivalents will not be funded and this has become a big issue. Region V is currently reviewing areas to dis-invest. There are a number of BRAC regional program managers that are looking at the 2001 date, and there is an indication they will be leaving. He said that this brain drain will cause a problem.

Regulatory/Policy Issues

It is expected that Unexploded Ordinance (UXO) is going to be an issue, especially in determining what type of surveys need to be conducted for areas that will be accessible to the public. It was also indicated that UXO projects will need to be balanced with costs, and there may be areas that will not be opened to the public, but could be used as wildlife habitats.

Questions

Lt Col Knight stated that he expects there to be active dialog between the Department of Defense (DoD) and the EPA. He asked what EPA Region V views will be the key issues.

Mr. Tindall answered that there may be two key issues: 1) How to survey property in relation to UXO property. The current Army Corps of Engineer policy of 2% to 3% statistical approach is not acceptable to the EPA. Those areas that will be made available

to the general public will need to be 100%, and this should include open grasslands, and low forest areas. 2) The question of how much to clean up to (UXO), or clean up level. What will be acceptable?

Lt Col Knight asked if the EPA Region 5 agreed that there will be some level of risk left.

EPA Region V agreed. The EPA's current position may mirror the Department of Defense Explosives Safety Board (DDESB) requirements that UXOs are removed to a certain depth based on land usage.

EPA Region V indicated that this Air Force-Regulator Environmental Restoration Summit provides a good venue for both the Air Force and the various regulating entities to discuss some very important issues. It is believed that it is important to have full participation from each EPA Region. It was pointed out that there are a number of states that have trouble being able to travel outside of their states and more so to travel outside of their own region.

Mr. Tindall ended by stating that these summits are worth the investment.

EPA Region 7
Gene Gunn, Branch Chief, Federal Facilities/Special Emphasis

Mr. Gunn began by thanking the Air Force (AF) for providing this opportunity. He then reviewed the Environmental Protection Agency (EPA) Regional Organizational structure. Mr. Gunn provided comments from Region 7, stating that all sites are "looking good". He stated that Richards-Gebaur AFB progress is good and it is anticipated that this base should provide a economic boom to the area.

Institutional controls are a big issue for the agency. A number of institutional controls are being used for private property due to costs and needs. There have been situations where institutional controls have not worked as intended. Because of these situations, the EPA is asking for a lot more detail on proposed institutional controls and is looking to identify a means of enforcement and inspection. The EPA is willing to work with the Air Force on institutional controls.

The EPA gave "kudos" to Ellsworth AFB on construction completions. Construction completions are very valuable to the EPA for "bean counting". There have been aggressive goals established for construction completions and EPA is asking the Air Force for help on meeting these goals. The last remedy in place (LRIP) and construction completions may be the same thing and the EPA would like to work on showing that they are. It is important to the EPA that once the LRIP is in place, a completed report be submitted as soon as possible.

An overview of the five-year review was provided. There is increasing effort on the EPA's part to re-examine remedies. Once the Record of Decision (ROD) is approved and the remedy is started, it is important to conduct public outreach during remediation. He stated that the five-year review could be either more or less restrictive.

It was indicted that there has been difficulty in obtaining historical records on Formerly Used Defense Sites (FUDS). He requested help on getting this information.

AF MAJCOM: Regional Perspective
Jeff Munday, Chief, Environmental Restoration, Air Force Materiel Command

Mr. Munday stated that he would be making this presentation for all the Major Commands (MAJCOMs). A historical perspective of the environmental cleanup program was provided. When the program was first implemented under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 120(h), there were many difficulties with staffing, low budgets, and lack of cooperation between regulators and the military. Now it appears that this situation has been reversed and there is a fairly stable budget, but most importantly, there is a cooperative effort between the regulators and the Air Force (AF).

A general organizational overview of the MAJCOMs was provided.

The issue of fines and penalties has arisen from time to time; however, in order to pay any fine, Mr. Munday must present the issue to Congress.

A brief overview of the budgeting process was given. Credibility must be established in order to get money for a program. Credibility creates an atmosphere for stable funding, which provides for a more effective program.

It is also important to apply sound business investment strategy. Adequate study of the situation is required to properly design a project. Based on congressional issues, interim projects have been implemented. The term "relative risk" is a means for providing a priority scheme and not strictly based on human risk.

It was noted that risk reduction is one item that is used for prioritizing a site. The Restoration Advisory Board (RAB) and the community may be concerned about a site, even if it is low in priority, which may drive it to become a high priority site. Legal agreements also play a vital role in this determination.

The Air Force is and has been willing to take risks to find new ways to clean sites.

These challenges were outlined:

- 1) Document review times are an issue at a number of bases; 65% of time is spent on the review process. If this turnaround time can be reduced, or if a commitment could be made for a schedule that would shorten project times, then the cleanup process is shortened. If a schedule is moved, for whatever reason, then the budget moves and the project moves.
- 2) It was noted that institutional controls are a challenge. Environmental Protection Agency (EPA) Regions 4 and 10 seem to have good policies in place. It is obvious that active bases have a natural obligation to apply and regulate institutional controls on the base.
- 3) It was also noted that every time a regulation, guidance, or policy changes, the process is affected. The Government Performance and Results Act (GPRA) is a prime example of this. The Department of Defense (DoD) has not had the opportunity to evaluate how GPRA will impact the

overall program.

Comments

Mr. Ken Tindall, EPA, replied that a trim schedule causes these types of problems to arise. When a nine (9) volume remedial investigation is reviewed and one part is not correct this could affect the whole document. In order to avoid this problem, there needs to be a focus on stringent QA/QC from the beginning. It is obvious that there needs to be a reasonable amount of QA/QC control to verify proper information.

Mr. John Smith, Air Force Base Conversion Agency (AFBCA), suggested that the Air Force and the regulators need to work out a format for the documents, and an agreement made for what information is needed in these documents. Additional meetings may be needed but time is saved in the long run.

Mr. David Haldeman, Nebraska, provided a personal observation. He stated that the regulator takes a personal interest to attain the goals of the Air Force, so they tend to need to get more information. He said that the regulator needs to know that the Air Force is focused on attaining its goals.

Mr. John Smith, AFBCA, stated that the most successful bases have been those in which the AF has sat down and worked on the documents with the regulators. It is important that we take a team approach. He said that the contractor writes the document for the contracting officer and this may include information that the regulator may not want.

Robin Sims suggested that if the Remedial Project Manager (RPM) is not resolving a problem, then it may be necessary to call the person on the agenda list for assistance.

State Perspective - Kansas
Randy Carlson, Unit Chief, Bureau of Environmental Remediation, Kansas
Department of Health and Environment

Mr. Carlson began by stating that it is encouraging that all the Air Force (AF) speakers' goals are the same. The Kansas Superfund program is not very large and currently there are only four (4) Full Time Equivalent (FTEs). These people are responsible for reviewing all Department of Defense (DoD) and Superfund sites. It was noted that when the Air Force is mentioned, a lot of praise is given for the work and cooperation. Mr. Carlson believes that the Air Force should be used as an example for the Army to follow. The state of Kansas is pleased with the Air Force's program.

Lt Col Knight asked if Kansas is satisfied with the Air Combat Command (ACC) remediation schedule. Mr. Carlson stated that it is on track.

Lt Col Knight stated that he was aware that the Titan Missile Sites needed further study. Mr. Carlson stated that this is correct and there is a potential reuse as residential property.

State Perspective - Missouri
Robert Geller, Chief, Federal Facilities Section, Missouri Department of Natural Resources

Mr. Geller began by stating that he is pleased with the Air Force (AF) comments and with what they have done. The presentations have been very helpful. It is apparent that the Air Force is serious about the restoration issue. He also stated that he is pleased to work with the Air National Guard.

Missouri's goal is to expedite environmental investigations and remediation. Much emphasis was placed on the importance of getting on with the business of cleanup and remediation where agreements are in place. It was noted that there should be more emphasis placed on "pollution prevention" in order to minimize future concerns. Richards-Gebaur AFB has been singled out as a facility that is now demonstrating success.

The state is committed to timely oversight and review, but did not want any surprises from the Air Force or the Environmental Protection Agency (EPA). He said that the Air Force Center for Environmental Excellence (AFCEE) should be appropriately handling many of the technical issues.

The state would like to see some type of two party agreement worked out to help the state and the Air Force maintain accountability and commitments to schedules. It was indicated that although a dispute process within the DoD/State Memorandum of Agreement (DSMOA) exists, its effectiveness may be limited when the issue being disputed is at an active base.

The state would like to see the other states incorporated as "true" partners in the environmental restoration activities. The preference is that the state be able to provide input and concurrence on decisions in this program.

Fully addressing institutional controls and overall impacts to the state's natural resources are upcoming issues.

State Perspective - Nebraska
David Haldeman, Chief, Superfund Section, Nebraska Department of
Environmental Quality

Mr. Haldeman provided an overview of the governor's goals. Program needs have increased, but the additions of more staff is unlikely. As a result, work will need to be better prioritized. This may affect the current level of effort being provided for document reviews.

The agency has not typically had a problem with out of state travel but this should be considered when the next meeting location is selected. More often than not, this issue is a public perception and not lack of funding. The public wants to know that government employees are spending their time efficiently and this summit is a good example of that.

State Perspective - Nebraska
Qazi Salahuddin, Nebraska Department of Environmental Quality

Mr. Salahuddin provided an overview of the Air Force sites in Nebraska. The innovative technology pilot studies at Offutt AFB were discussed. This study, and others like it, have the support of the state due to the potential to reduce costs. An example of this type of study is the Hydrogen Gas Injection Enhancement study currently being conducted by the Air Force Center for Environmental Excellence (AFCEE).

Mr. Salahuddin concluded by saying that the reports submitted by Offutt AFB are of good quality.

Data Management and Government Information Systems
David Wilson, US Environmental Protection Agency Region 5

Mr. Wilson provided an overview of the Environmental Data Management and Analysis Network, which was developed to provide a means to query data sets to get an overall view of a site. This system allows the user to “get better data and to better utilize that data.”

This system uses off the shelf products. It takes data and moves it into usable tools (software) that can be used for modeling or database management. An example of how this system would work in a real situation was presented. The system allows for a more efficient means of data validation.

The Air Force indicated that all data is currently being maintained in Installation Restoration Program Information Management System (IRPIMS) and stored at the Air Force Center for Environmental Excellence (AFCEE). It was indicated that it may be difficult and costly to convert this data. The point was also made that it is important that all systems need to be the same so as to ease the transfer of information from one organization to another.

Mr. Lundquist suggested that there needs to be further communication between the Environmental Protection Agency (EPA) Region 5, the Air Force, and the AFCEE on the potential to utilize this system.