Beyond Response Complete (RC) at DoD Sites

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DoD Post Remedy In Place Status

➢ To date, the DERP has focused on achieving program goals for getting remedies in place or achieving response complete (RIP/RC)
  – The RIP/RC program goal for DoD is substantively equivalent to the EPA construction completion milestone

➢ DoD has made significant progress toward achieving our RIP/RC goals
  – 86% of IRP sites on Active installations have achieved RIP/RC
  – 71% of IRP sites on FUDS properties have achieved RIP/RC
  – 88% of IRP sites on Legacy BRAC installations have achieved RIP/RC
  – 54% of IRP sites on BRAC 2005 installations have achieved RIP/RC
  – 39% of all MMRP sites (Active, BRAC, FUDs) have reached RIP/RC
With the progress made in achieving RIP/RC, DoD can begin to focus on the next phase of the cleanup program.

Ensuring long term protectiveness of remedies will be of increasing importance.

DoD does have many policies in place designed to ensure the protectiveness of remedies over the long term.

DoD does not currently have a metric to track sites beyond RIP/RC.
DoD’s Strategy to Ensure Protectiveness

- DERP Manual – Strengthened and updated
  - Enhanced language on documenting, implementing, and maintaining LUCs at both active and transferring installations
  - LTM costs are now eligible for DERP funding
    - DoD recognizes the importance of this phase to the overall cleanup program
    - DoD takes LTM responsibilities seriously and wants to ensure funding is available to address it
  - Increased emphasis on Five-Year Reviews
    - Clarifies need to look at new/modified ARARs, toxicity values, exposure assumptions, land use during the five year review process
  - ASTSWMO comments on The Manual have been addressed and a comment resolution document will be distributed pending resolution of issues with EPA

- DoD Vapor Intrusion Handbook
  - Finalized in January 2009
  - Tool to help DoD evaluate and investigate the VI pathway
  - Demonstrates commitment to release new policies & guidance as new pathways, contaminants, issues are identified
DoD’s Strategy to Ensure Protectiveness

- **Green Remediation Policy**
  - Released policy memo in August 2009
  - Encourages efficient energy use, pollution prevention, and minimization of environmental impacts of current and future remedies

- **Coordinate with the Emerging Contaminants Program**
  - Identifies chemicals or materials that either lack human health standards or have an evolving science and regulatory status
Looking Ahead  Beyond RIP/RC

➢ Five Year Reviews
  – DoD is meeting with the EPA to hear IG recommendations and EPA’s proposed plan forward
  – DoD will determine if/how recommendations should be incorporated into DoD policies

➢ DoD is planning and budgeting for funding the Long Term Monitoring Phase
  – DoD anticipates having 5,156 sites in LTM phase
  – Current total DoD-wide estimated CTC for the LTM phase is $3.5B

➢ Will review need for overall long term protectiveness policies and guidance
DoD is committed to ensuring the protectiveness of all sites over the long term and will ensure any necessary policies are in place to guide the Components during this phase of cleanup.

When sites transition into the LTP phase, oversight responsibility transfers from EPA to the States:
- DoD will work with the Components to ensure that this transition goes as smoothly as possible.
- DoD will need to have a better understanding of State needs during this phase.
Questions?

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