

Other Agency LTS Perspectives



Mario Ierardi, U.S. Department of Defense

Murray Newton, U.S. Environmental Protection Agency

Long-Term Stewardship Workshop
Grand Junction, Colorado
Wednesday, August 1, 2001

EPA LTS Perspectives



Murray Newton, U.S. Environmental Protection Agency

**Long-Term Stewardship Workshop
Grand Junction, Colorado
Wednesday, August 1, 2001**



EPA United States
Environmental Protection Agency

EPA Perspective on LTS Plans

- d Regulator not implementer
- d (Some) cleanups end
- d Same problems, different scale
- d Learned behavior
- d Five-year review an important control

August 1, 2001



EPA United States
Environmental Protection Agency

Where are we now?

d EPA

- RI/FS Guidance
- Record of Decision Guidance
- Operation and Maintenance Guidance
- Five-Year Review Guidance

August 1, 2001

DOD LTS Perspectives



Mario Ierardi, U.S. Department of Defense

**Long-Term Stewardship Workshop
Grand Junction, Colorado
Wednesday, August 1, 2001**



EPA United States
Environmental Protection Agency

Why am I Here?

- d Long-term stewardship (LTS) is not just a DOE issue
 - Perception is DOE has unique long-lived contaminants
 - DOD has UXO, metals, DNAPLs
 - 123 DOD sites on NPL
 - Estimated cleanup costs: \$30 billion
- d Most sites undergoing cleanup today will require some sort of long-term care
- d To learn from others who have begun to plan for LTS

August 1, 2001



EPA United States
Environmental Protection Agency

AF BRAC FACTS.....A Few More Reasons

d 32 Installations nationwide (12 NPL)

- Represents 85,000 acres, Some had up to 26,000 jobs

d Extensive GW Contamination

- Over 30 Billion Gallons
- 34 P&T Systems, Over 10,000 MW's
- Cleanup timeframes from decades to hundreds of years

d 174 Landfills

- Presumptive Remedy Rush
- Long Term Liability

August 1, 2001



EPA United States
Environmental Protection Agency

What is Long-term Stewardship?

- d All activities necessary to ensure protection of human health and the environment following completion of cleanup, disposal, or stabilization activities *including an approved Operating Properly and Successfully (OPS) where required*
 - Includes all engineered and institutional controls designed to contain or prevent exposures to residual contamination and waste (e.g., disposal caps, access restrictions)

August 1, 2001



EPA United States
Environmental Protection Agency

Why do we need to plan for LTS?

- d More Base Realignment and Closures (BRAC)?
- d BRAC mission is to cleanup & transfer property
 - “Fast Track Cleanup”Short-Sighted Decisions
- d Decisions to date generally lack:
 - Remedial Action Objectives (RAO)
 - Confirmation plan for achievement of RAO
 - Consideration of LTS issues
 - Analysis of alternatives for unrestricted use
 - Identification of ICs/LUCs

August 1, 2001



EPA United States
Environmental Protection Agency

DOD Requirements for LTS

- d No current guidance or policy
- d No “requirements” for LTS Plans
 - However, new DERP guidance defines a long-term phase, and addresses UXO & environmental liabilities
- d DOD requires Management Action Plans & BRAC Cleanup Plans



EPA United States
Environmental Protection Agency

Where are we now?

- DOD has remained quiet on LTS
- LTS is occurring now....but is mostly unplanned
 - Full requirements unprogrammed
 - Institutional Control/Land Use Control Policy
 - Land Use Control Information System (LUCIS)
- Many challenges remain before an effective LTS program is implemented
 - Awareness, Policy, Guidance, Funding, Training.....

August 1, 2001



EPA United States
Environmental Protection Agency

Key LTS Challenges

- d Lack of awareness, policy, guidance, training...dialogue
- d Incorporating LTS considerations into cleanup decisions
- d LTS effectiveness thru changes in property ownership
- d Ensuring open access to info on residual hazards
- d Ensuring reliable and sufficient funding

August 1, 2001



EPA United States
Environmental Protection Agency

Key LTS Challenges

- d Maintaining partnerships with federal, state, tribal, & LGs
- d Mechanisms/Technologies to promote LTS sustainability
- d Estimating “true” long term costs
- d Sharing LTS Ownership at the federal, state, & local levels
- d Lack of long term records/info management strategy

August 1, 2001



EPA United States
Environmental Protection Agency

What's Next?

- d Need to improve inter-agency LTS coordination
 - AF/DOE Partnership
- d Increase awareness & develop baseline for LTS
 - Leverage existing interagency LTS info & approaches
- d Integrate LTS into cleanup & property transfer process
 - Develop guidance and focus technology on LTS issues
 - Develop Site Closeout Plans to include LTS requirements

August 1, 2001



EPA United States
Environmental Protection Agency

Summary

- d DOD can learn from your LTS efforts
- d LTS awareness needs to improve on Federal, State and Local levels.....requires a “national focus”
- d LTS is an integral part of an effective cleanup strategy

LTS.....Begin with the end in mind!