

**BY ORDER OF THE COMMANDER,  
UNITED STATES AIR FORCES IN EUROPE  
(USAFE)**

**UNITED STATES AIR FORCES IN EUROPE  
INSTRUCTION 32-7067**

**24 JULY 2007**  
Certified Current on 16 April 2014  
**Civil Engineering**



**USAFE CLEANUP PROGRAM MANAGEMENT**

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OPR: HQ USAFE/A7CVR

Certified by: HQ USAFE/A7CV  
(Mr. Dennis J. Scott)

Supersedes USAFEI32-7067, 26 March 2002

Pages: 31

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This instruction implements Air Force Policy Directive (AFPD) 32-70, *Environmental Quality* and supports policy established by Department of Defense (DOD) Instruction (DODI) 4715.8, *Environmental Remediation for DOD Activities Overseas*, European Command (EUCOM) Directive (ED) 80-2, *Environmental Executive Agent Remediation Policy*, and Air Force Instruction (AFI) 32-7006, *Environmental Program in Foreign Countries*. This instruction outlines the overall framework for bases to manage their Cleanup Program ensuring consistency across United States Air Forces in Europe (USAFE). This instruction applies to HQ USAFE, USAFE installations including main operating bases (MOB), their geographically separated units (GSU) and those areas leased to the United States Air Force (USAF) (to the extent required or authorized under applicable agreements). This instruction applies when USAFE personnel and assets are used to remediate environmental contamination caused by uncontrolled or unconfined releases of hazardous substances and petroleum, oil, and lubricants (POL), from United States (US) DOD activities within the USAFE area of responsibility (AOR). In cases where it conflicts with the requirements of applicable international agreements or environmental annexes to operational directives, this instruction does not apply. This instruction does not address hazardous material management or the initial response to hazardous substance releases. Such topics are covered in the country-specific Final Governing Standards (FGS) or, in countries where no FGS exist, the Overseas Environmental Baseline Guidance Document (OEBGD) and other USAFE instructions/policies. This publication does not apply to Air Force Reserve Command (AFRC) units or to the Air National Guard (ANG). This instruction integrates, or otherwise employs the concepts of sustainable operations, natural infrastructure management and is consistent with the USAFE environmental management system (EMS) implementation. Ensure that all records created as a result of processes prescribed in this publication are maintained in accordance with Air Force Manual (AFMAN) 37-123 (will convert to AFMAN 33-363), *Management of Records*, and disposed of in accordance with the Air Force Records Disposition Schedule (RDS) located in AFRIMS (AF Portal).

***SUMMARY OF CHANGES***

**This document is substantially revised and must be completely reviewed.** This publication has been substantially revised and must be completely reviewed. This version consolidates and supersedes the 26 March 2002 version of this policy and the supplemental USAFE Environmental Cleanup Program Policy dated 9 June 2004. Major changes include the incorporation of a EUCOM standard format for remedial action management plans (RAMP), clarification on the cleanup process and related terms, and updated administrative information (e.g, office symbols).

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## 1. Guidance:

1.1. **General Information.** HQ USAFE and each USAFE installation must conduct remedial actions according to international agreement requirements, DOD policy, EUCOM policy, Air Force (AF) policy, and this instruction. Unless an applicable international agreement says otherwise, a risk-based strategy must be used to determine where and how much remediation to perform. The risk-based strategy will use a teaming approach involving installation personnel, HQ USAFE staff, appropriate DOD Environmental Executive Agent (EEA), and host nation (HN) authorities as required.

1.2. **Scope and Concept.** The HQ USAFE Installation Cleanup Program consists of four phases. These phases cover the management of sites where environmental contamination is suspected and sites where environmental contamination exists as a result of uncontrolled or unconfined hazardous substances releases from US DOD, DOD contractor, or non-DOD US government agency activities. HQ USAFE and each USAFE installation must develop, conduct, and maintain a program to discover contaminated sites, validate the extent of the problem, assess the risk and institute remedial action, hence the four phases: Site Discovery, Validation, Risk Assessment, and Remedial Action. This program reduces threats to human health, safety, or mission operations. The HQ USAFE Cleanup Program overview diagram is located in [Attachment 2](#).

## 2. Responsibilities:

### 2.1. Major Command (MAJCOM).

2.1.1. The USAFE Commander (COMUSAFE), (USAFE/CC) is the EEA for the United Kingdom (UK), Turkey, and Portugal (Azores) as stipulated in DODI 4715.8 and any supplemental documentation, and is responsible for the overall risk management of the cleanup programs ensuring compliance with DOD, EUCOM, and AF policies as well as international agreements. COMUSAFE has delegated all EEA responsibilities to the USAFE Vice Commander (USAFE/CV). COMUSAFE is also the DOD Component Commander for all USAFE installations located within the EUCOM geographic area of responsibility (AOR). USAFE/CV may delegate certain EEA and DOD Component Commander cleanup responsibilities under this USAFE instruction to The USAFE Civil Engineer.

2.1.2. The USAFE Civil Engineer provides environmental oversight to all USAFE installations located within the EUCOM AOR and supports all DOD EEAs to ensure compliance with DOD, EUCOM, and AF policies as well as international agreements.

2.1.3. USAFE Environmental Safety and Occupational Health Council (ESOHC) Cleanup Subcommittee. Key members of the USAFE ESOHC Cleanup Subcommittee include representatives from the HQ USAFE Environmental Function (Chairman), HQ USAFE Environmental Engineering, HQ USAFE International Law, HQ USAFE Public Affairs, and HQ USAFE Ground Safety. Installation representatives and others attend as required. According to the USAFE ESOHC Cleanup Subcommittee charter, the Cleanup Subcommittee reviews, evaluates, and proposes recommendations on the implementation of the cleanup program throughout USAFE. The subcommittee reports the progress toward accomplishing the Commander in Chief (CINC) EUCOM, Secretary of the Air Force, and Chief of Staff of the Air Force objectives and goals to the USAFE ESOHC. The USAFE ESOHC Cleanup Subcommittee:

2.1.3.1. Resolves program management and execution issues in the discovery and cleanup of contaminated sites, advises installation commanders on how to manage restoration sites, forms

and disbands subordinate working groups as required, and serves as the primary cross-functional integration element for all environmental cleanup issues and programs.

2.1.3.2. Develops, reviews, approves, and oversees the command cleanup program as defined by DOD policy, which includes HN standards, Air Force policy, and Executive Order; advises leadership on and directs critical or sensitive remediation activities at the installation level; reviews and validates all RAMPs prior to seeking approval; reviews USAFE implementing guidance and instruction for new DOD and AF cleanup directives; reviews, evaluates, and approves annual financial plans; and integrates cross-functional issues with other subcommittees.

2.1.3.3. Produces a current command prioritized cleanup sites list, recommended funding strategy for the command cleanup program, and program reports as requested by the USAFE ESOHC.

2.1.4. The HQ USAFE Environmental Function (HQ USAFE/A7AV):

2.1.4.1. Supports and advises all DOD EEAs, The USAFE Civil Engineer, and USAFE installations as required.

2.1.4.2. Prepares, coordinates, and implements cleanup policies.

2.1.4.3. Coordinates, consults, and negotiates with installation level and HN authorities as authorized and required.

2.1.4.4. Provides technical assistance, advice, and training.

2.1.4.4.1. Performs Discovery (Phase 1) and Risk Assessment (Phase 3) if the command cleanup program manager (CCPM) determines this to be in the best interest of USAFE.

2.1.4.5. Ensures compliance with sustainable operations and natural infrastructure management concepts.

2.1.4.6. Audits the program implementation and quality by established metric(s), quarterly data calls and the Environmental, Safety and Occupational Health Compliance Assessment Management Program (ESOH CAMP).

2.1.4.7. Validates projects and supports budgeting and funding.

2.1.4.8. Coordinates with the respective DOD EEAs.

2.1.5. HQ USAFE Environmental Function Restoration Element (HQ USAFE/A7AVR). Performs the overall risk management of USAFE's Installation Cleanup Programs, participates in installation programs only as required, and chairs the USAFE ESOHC Cleanup Subcommittee. The function identifies a CCPM to oversee the management and implementation of Phase 3 (Risk Assessment) and Phase 4 (Remedial Action) of the Cleanup Program in conjunction with the installation cleanup program manager (ICPM). The function also conducts at least one annual workshop for training and education of ICPM. The workshop provides detailed information on how the Cleanup Program phases should be approached and implemented. The function provides updates to this policy as required due to changes in DOD, EUCOM, AF, and HN statutes.

2.1.6. HQ USAFE International Law Function (HQ USAFE/JAI). Provides legal reviews, interpretations, and advice on all HN matters, correspondence, issues, and laws as well as DOD, EUCOM, AF, and USAFE policies to ensure they are understood by all necessary personnel

enabling sound and legal environmental decisions. HQ USAFE/JAI reviews new policies planned for implementation by the HQ USAFE Environmental Function for legal sufficiency. HQ USAFE/JAI is a member of the USAFE ESOHC Cleanup Subcommittee.

2.1.7. HQ USAFE Bioenvironmental Engineering (HQ USAFE/SGPB) is the USAFE medical authority for any human health risk-based decisions, policies, and guidance. This office assists the installation bioenvironmental engineers in supporting the Base Environmental Functions with the necessary information to identify, evaluate, and cleanup contaminated sites removing any unacceptable risk to human health, and is a member of the USAFE ESOHC Cleanup Subcommittee.

2.1.8. HQ USAFE Ground Safety (HQ USAFE/SEG). Assists the USAFE ESOHC Cleanup Subcommittee and their installation Safety Offices with the necessary information to make an informed decision as to any safety risk associated with contaminated land. HQ USAFE/SEG is a member of the USAFE ESOHC Cleanup Subcommittee.

2.1.9. HQ USAFE Public Affairs- Operations Division (HQ USAFE/PAO). Provides USAFE ESOHC Cleanup Subcommittee public affairs advice and council on public communication issues, as well as expertise on DOD, EUCOM, and AF public affairs policy. HQ USAFE/PAO will develop public affairs guidance for HQ or base-level execution when appropriate. HQ USAFE/PAO is a member of the USAFE ESOHC Cleanup Subcommittee.

## **2.2. USAFE Installations:**

2.2.1. Installation Commander. After receiving confirmation of contamination, reviewing the risk assessment, and considering installation ESOHC Cleanup Subcommittee recommendations, the installation commander will forward a recommendation for remedial action of a contaminated site in the form of a RAMP to HQ USAFE Environmental Function for action.

2.2.2. Base Civil Engineer (BCE). The BCE oversees the overall program management at the installation to which they are assigned, including the installation's subordinate sites and GSUs, and supports the Base Environmental Function and ICPM with appropriate resources.

2.2.3. Installation ESOHC Cleanup Subcommittee. An ESOHC Cleanup Subcommittee will be established at each USAFE installation, chaired by the ICPM or the Base Environmental Function. Installation legal, public affairs, engineering, environmental, bioenvironmental, real estate, ground safety, and relevant non-voting members as required, e.g., HN design agencies, will comprise the subcommittee. The ESOHC Cleanup Subcommittee will review and validate data on suspected contaminated sites, including a threat assessment of each suspected site. If the subcommittee determines there is a potential threat, the site is identified as a "contaminated site" and the subcommittee will prioritize the site for risk assessment and submit it to the HQ USAFE Environmental Function for further action. If no threat appears likely, the subcommittee records the site as "Excluded," and takes no further action. The subcommittee will submit meeting minutes to the HQ USAFE Environmental Function for information to ensure theater-wide program consistency. This group will also oversee compliance with applicable cleanup goals and take necessary measures to ensure the goals are obtained.

2.2.4. Base Environmental Function. The Base Environmental Function implements the USAFE cleanup policy and develops respective local guidance. The Base Environmental Function designates an ICPM and an alternate, as required, to manage and implement all phases of the program using a teaming approach between the installation and the HQ USAFE Environmental Function according to this instruction.

2.2.5. Installation Cleanup Program Manager. The ICPM manages the overall installation cleanup program including all associated cleanup sites and projects. ICPMs should, where applicable:

2.2.5.1. Ensure a Site Discovery (Phase 1) effort for their area of responsibility is accomplished (to the extent required or authorized under applicable agreements).

2.2.5.2. Initiate and manage the Validation (Phase 2) process and support preparation of the validation report.

2.2.5.3. Coordinate, in advance, with the command cleanup program manager to accomplish Risk Assessment and Remedial Action phases of the program.

2.2.5.4. Develop bullet background papers (BBP), statements of work (SOW) with specifications, and RAMPs in support of all phases of the cleanup program.

2.2.5.5. Prepare and provide documentation to the HQ USAFE Environmental Function quarterly, or as requested.

2.2.5.6. Monitor and/or provide guidance for adequate oversight of remediation projects in coordination with the HQ USAFE Environmental Function, in conjunction with contracting, and directs quality assurance (QA) to ensure proper application of DOD and USAFE policy, as well as proper application of standards and state-of-the-art cleanup technologies.

2.2.5.7. Ensure that the Base Development Office reviews and understands the nature of the contaminated sites to avoid incompatible land use situations.

2.2.6. Installation Base Development Office. The installation Base Development Office ensures new buildings are not planned for construction on contaminated sites. The office accomplishes this by incorporating the installation cleanup program contaminated sites list into the installation comprehensive plan, and coordinating plans and proposed facility locations with the ICPM prior to receiving Facilities Board approval.

2.2.7. Installation Project and Construction Engineers. The installation project and construction engineers, as well as other base organizations included in construction, must coordinate further action, to include obtaining any required construction permits with the ICPM and inform the ICPM as soon as possible when contaminated soil or groundwater has been identified during project construction.

2.2.8. Installation Real Estate Managers. The installation real estate managers must coordinate closely with HQ USAFE Real Estate Managers and the ICPM prior to making any final decision about the closure of installations which may include areas of suspected soil or groundwater contamination. This includes coordination on requests to acquire property not currently in the possession of US Forces.

2.2.9. Installation Bioenvironmental Engineer. The installation bioenvironmental engineer is the representative of the installation medical authority and must coordinate on any human health risk-based decisions. The installation bioenvironmental engineer reviews and approves suspected contaminated site validations; reviews SOWs or project specifications for contaminated sites risk assessments, has final review of risk assessments; and interprets risk-based results and remedial action documents.

2.2.10. Installation Staff Judge Advocate. The installation Staff Judge Advocate consults with the HQ USAFE international law office to ensure all HN, DOD, EUCOM, AF, and USAFE policies are understood by all necessary personnel so sound and legal environmental decisions are made.

2.2.11. Installation Ground Safety Office. The installation Ground Safety Office coordinates closely with the ICPM to assess contaminated sites for their effect on the safety of AF personnel and ensure environmental cleanup costs resulting from mishaps are incorporated into mishap investigation reports, as required by AFI 91-204, *Safety Investigations and Reports*. Additionally, the installation safety office reviews contracts, SOWs, performance work statements, service contracts, and project specifications to ensure applicable safety requirements are included.

**3. Program Scope, Procedures, and Documentation.** The USAFE Cleanup Program consists of four phases covering the management of remedial actions of suspected or known environmental contamination resulting from uncontrolled or unconfined hazardous substances releases from DOD activities, as well as activities of DOD contractors or non-DOD US Government agencies (e.g., Department of State or National Aeronautical and Space Administration (NASA)). The ICPM is the focal point to manage the installation cleanup program.

3.1. **Phase 1--Site Discovery (DISCO).** Discovery of suspected contaminated sites must be accomplished at all USAFE installations (to the extent required or authorized under applicable agreements) and managed at the installation level with assistance from the HQ USAFE Environmental Function as needed. The ICPM must identify and track suspected contaminated sites in an installation contaminated sites database to avoid adverse impacts to human health and to avoid uncontrolled hazardous substance releases. If a potential pollutant discharge area (PPDA) is identified during the site discovery, the ICPM must notify the spill program manager to ensure the PPDA is addressed in the base Spill Plan.

3.1.1. Action. The installation ESOHC Cleanup Subcommittee forms an installation site discovery team whenever needed to investigate those locations where hazardous substances were handled in the past or are currently being handled, used, stored, treated, or disposed of and where those substances may have been or have been released through spills to the environment. The subcommittee selects team members based on their knowledge and experience with hazardous substances and may be comprised of representatives from fuels, logistics, and maintenance functions. The ICPM, supported by the ESOHC Cleanup Subcommittee, plans the team's activities, receives information from the team, and reports on the team's progress to the installation ESOHC. The HQ USAFE Environmental Function provides training, guidance, and ANG support for these teams and assists with the investigations, if requested and available.

3.1.2. Documentation. A list of the suspected and confirmed contaminated sites must be developed and maintained by the ICPM. For the site specifics required by the HQ USAFE Environmental Function, see para 4.2. Data for all sites data must be updated quarterly or as required. When available, the sites must then be entered into the installation Geographical Information System (GIS) database.

3.1.2.1. Sites Discovered Beyond the DISCO Process. Suspected contaminated sites may also be discovered during routine base activities (e.g. construction, environmental monitoring, etc) outside of the DISCO process. Sites discovered this way must be inserted into the contaminated sites database and addressed accordingly through the cleanup process.

3.1.2.2. **Spill Cleanup Sites.** Initial response to a hazardous substances spill typically includes elimination/isolation of the spill source and recovery of the spilled material. If the initial response cannot remove the contaminants to under the maximum contamination levels imposed by the FGS, HN, or international agreement, the spill site will be inserted into the contaminated sites database and addressed accordingly through the cleanup process.

3.2. **Phase 2--Validation.** Installation personnel must coordinate with the installation bioenvironmental engineers to validate all suspected contaminated sites identified during the Phase 1 process or during uncontained hazardous substance releases.

3.2.1. **Action.** A site validation must be done for suspected contaminated sites or sites resulting from an uncontrolled hazardous substances release. The installation ESOHC Cleanup Subcommittee must conduct site validations of all discovered sites suspected of contamination based on actual or potential endangerment to human health and safety, and the overall operations at the installation. Limited fieldwork such as drilling and media sampling may be required to validate the site. The validation team members may use the "USAFE Threat Assessment Worksheet" in **Attachment 3** or another tool deemed appropriate by the installation bioenvironmental engineers. Sites without a potential threat will be considered excluded sites. Such sites will remain listed on the DISCO inventory maps and GIS database when available, but will be excluded from further action. Excluded sites reactivated because of new information concerning old contamination will continue to be identified using the current site identification; however, if a new spill occurs at the location of a previously excluded site and the spill could not be completely recovered, it will receive a new site identification.

3.2.2. **Documentation.** The installation ESOHC Cleanup Subcommittee must produce a validation or nonvalidation (excluded) report for each suspected site and approve it within their meeting minutes.

3.3. **Phase 3--Risk Assessment.** Validated sites that are not excluded must be assessed to determine the level of risk presented by the contamination. Risk assessment consists of site characterization, i.e., physical investigation; and site assessment, i.e., using the site characterization data to determine the risk. The ICPM accomplishes the site assessment with support from a competent HQ USAFE risk assessor and the USAFE risk assessment decision support system (RADDS), unless the base receives approval from the command cleanup program manager (CCPM) to apply an alternative method more appropriate for the situation. The installation and USAFE ESOHC Cleanup Subcommittees will then coordinate and review the calculated risk to determine what, if any, remediation may be required. If the site does not pose an unacceptable risk, it will be excluded. Sites determined to pose an unacceptable risk will be targeted for remediation and will require a RAMP.

3.3.1. **Action.** The ICPM must produce a list of contaminated sites requiring a risk assessment based on the results of Phase 2. Efforts must be made to consolidate as many sites as practicable into a single assessment project to reduce cost. Additionally, a BBP must be prepared for each requested risk assessment project to document the background of each site and why a risk assessment is being required, along with copies of the actual Automated Civil Engineer System (ACES) project entries and SOWs. This will enable proper funding validation. The SOW will allow proper contracting action. The ICPM submits all documents to CCPM for project validation and funding.

3.3.2. **Documentation.** The ICPM will manage the risk assessment projects at the installation in consultation with CCPM. The installation bioenvironmental engineer shall coordinate on human

health risk assessment input. A competent risk assessor will lead the risk assessment for each site which must address, at a minimum, contaminants, pathways, and receptors.

3.3.2.1. Contaminants. The competent risk assessor confirms the accuracy of the data used to determine the presence or absence of significant contaminants found at the site. The installation bioenvironmental engineer reviews the decision process regarding which contaminants were considered and eliminated from consideration and how risks to human health were calculated.

3.3.2.2. Pathways. The ICPM records the decision process leading to which pathways were considered and which were eliminated from consideration, as well as the hydrogeological conditions present at the site and its environs to the degree relevant to assessing all potential pathways to receptors.

3.3.2.3. Receptors. The ICPM documents the selection of the receptor populations. The documentation must be realistic and reflect all receptors reasonably expected to be affected by the site.

3.3.2.4. Calculations. The ICPM describes the model used to produce the final risk characterizations and demonstrates how the model produced the characterizations for every potential combination of contaminant, pathway, and receptor. The ICPM gives reasons for excluding specific combinations. The final product or risk assessment must recommend the exclusion of sites or make recommendations for remedial action. To do this, the risk assessment must include a decision document addressing appropriate levels of remedial action considered with an explanation as to why the chosen remedial action was selected. The assessments must allow the comparison of different risk based alternatives and leave the decision authority to the responsible installation ESOHC or installation commander.

#### **3.4. Phase 4--Remedial Action.**

3.4.1. Action. To officially document and request remedial action, a RAMP for each remedial action project must be developed. Remedial action at a site can range from total cleanup to the final risk level to monitoring of a site to confirm its low risk, if cost effective and feasible. All USAFE installations must submit their RAMPs to the HQ USAFE Environmental Function who will coordinate with the EEA and the appropriate approval authority before any commitment is made regarding the extent of remediation to be performed at a contaminated site and prior to receiving funding. The installation commander must take prompt action to address remediation of environmental contamination originating from DOD operations located on or emanating from DOD installations, if one of the three categories was assessed during the risk assessment:

3.4.1.1. The site presents a known imminent and substantial endangerment to human health and safety (KISE).

3.4.1.2. Cleanup is necessary to maintain operations or protect safety or human health (MOSH). After consultation with the EEA, COMUSAFE or a designated approval authority may approve additional remediation of environmental contamination if the remediation is required to maintain mission operations or protect safety or human health.

3.4.1.3. Cleanup is required by international agreement (IA). To support the IA justification for cleanup, HQ USAFE International Law point of contact (POC) must make a legal determi-

nation as to whether the requirement for remediation is mandatory and arises from a binding international agreement that pertains to US military operating rights in the HN.

### 3.4.2. Documentation.

3.4.2.1. Purpose of a RAMP. The RAMP serves as a decision document that presents the official opinion of the installation commander and bioenvironmental engineer with regards to human health risk. The RAMP will provide the necessary information to the USAFE ESOHC Cleanup Subcommittee, the appropriate approval authority, and the appropriate EEA with regards to any remedial action within the USAFE AOR. RAMP content and format requirements are provided in **Attachment 4**. The RAMP should contain descriptive and succinct information. The RAMP must be prepared as an official record by the ICPM using architect and engineer (A&E) support, as needed, and approved and signed by the installation commander or ESOHC chairman. Additionally, HQ USAFE must ensure that DOD, EUCOM, and USAFE policies are not overlooked and that projects will be completed according to the submittal plan or design. The HQ USAFE Environmental Function must rely on the individual DOD installations to effectively manage their cleanup program, risk assessments, and remedial action projects, and to provide oversight to ensure contractors complete the remediation according to plan or design, intent, regulatory requirement, and standard engineering and geo-technical principles. This will involve some degree of field observation and evaluation by the ICPMs, which should also be outlined in the RAMP. The RAMP will also provide consistency among the DOD components in dealings with environmental authorities throughout the HN.

3.4.2.2. Submittal of the RAMP to the HQ USAFE Environmental Function. A RAMP must be submitted for each remedial action project to the CCPM by 1 March in the fiscal year (FY) preceding the project FY. Once the RAMP is completed and ready for submittal, the ICPM must obtain the necessary coordination and approval from the installation commander or installation ESOHC chairman. Once approved, the ICPM submits the final RAMP to the HQ USAFE Environmental Function accompanied by an official letter signed by the installation commander or installation ESOHC chairman, or the installation commander's delegated representative, with a recommended course of action along with the justification.

3.4.2.3. Approval Process of Remedial Action Projects. In order for an installation to obtain approval for any type of remedial action, The CCPM must receive, review, and validate the installation's RAMP for that project. Once received, the RAMP will be presented to the USAFE ESOHC Cleanup Subcommittee and then coordinated with the EEA and appropriate approval authority. Normally, within 60 days, the EEA will review the RAMP, consult with CCPM for clarification, and provide a concurrence or non-concurrence with the proposed remediation. In the case the EEA nonconcurrs with the RAMP, COMUSAFE may appeal to EUCOM. Once the RAMP is coordinated, the installation will be informed if the RAMP is approved or disapproved. If approved, the funding will be sent after a request for funds has been received. Only once the RAMP is approved, will the HQ USAFE Environmental Function fund the remedial action.

3.4.2.4. Completion of Remedial Action. The ICPM must document the proper and successful completion of remedial action. Remedial action projects are considered complete when the environmental contamination no longer poses a risk to human health and safety, no longer poses an impact to mission operations, or meets the standards of the applicable international

agreement. The ICPM must decide whether the remedial action is complete and document the decision. The ICPM must include any relevant information about the remedial action and the HN environmental authorities' position in the decision document. The ICPM must then submit that decision document to the installation ESOHC Cleanup Subcommittee for review and concurrence prior to seeking approval from the installation commander. The installation commander may delegate final approval authority to the BCE. The installation commander or designated authority must then sign a final decision document stating that the remedial action is complete. The ICPM must then ensure the installation ESOHC is briefed on the completion of the remedial action and transmit the final decision document to the USAFE ESOHC Cleanup Subcommittee, through the CCPM. A closure report (for requirements, see 4.2.) must be prepared and submitted with the next scheduled cleanup data call.

#### **4. Cleanup Program Filing and Reporting:**

4.1. **Purpose.** The Installation Cleanup Program File is an installation-specific file system for continuity purposes. It documents all available information about the phased cleanup process, including discovered sites, their history, site descriptions, HN involvement, risk analyses, site specific RAMPs, remedial action, final site dispositions, ACES programming and budgeting actions, policy, laws, and other information as appropriate. As mentioned above, site specific RAMPs must be incorporated into the overall installation cleanup program file system. The ICPM manages and maintains the file.

4.2. **Reporting Information.** A quarterly cleanup program data call requires installations to provide updated cleanup information to the HQ USAFE Environmental Function Restoration Element. This data call reflects the current installation cleanup program status. The CCPM will review and update the report format as required to meet current data tracking needs. The CCPM will review quarterly data inputs to assess the progress of the USAFE cleanup program looking for trends and opportunities for improvement, and present program status to USAFE's senior leadership as required. Installation Environmental Functions must submit their completed data call on a quarterly basis.

4.2.1. **Sites for Tracking Purposes.** Contaminated sites off the installation requiring USAFE oversight because of soil and/or groundwater pollution, with the potential to adversely impact USAFE operations must be listed as sites for tracking purposes. A BBP reflecting the current status is required (e.g. pipeline or if source is on US-owned land or privately owned property). Claims from property owners would follow the DOD claims process for international agreements claims as directed by the appropriate legal office.

#### **5. HN Authorities Involvement and the Release of Documents:**

5.1. **HN Authorities Involvement.** Often, remedial action will be contracted through HN design agencies that are separate from the HN enforcement authorities. The HN design agencies are not authorized to direct remedial action, consult with HN enforcement authorities without USAFE involvement, or release documents to HN authorities without installation approval. Although their advice is welcome, decisions regarding when and what type of remedial action is required must follow procedures as described in this instruction and are made by the installation ESOHC, installation commander, or ESOHC Cleanup Subcommittee in conjunction with HQ USAFE Environmental Function Restoration Element. In cases where either local, regional, or higher HN government authorities are involved or notified under the cleanup program, advance notice must be given to the HQ USAFE Environmental Function and/or the CCPM. The HQ USAFE Environmental Function approves or dis-

approves the involvement of environmental authorities in accordance with DOD policy and EUCOM policy, considering the EEA responsibilities. The HQ USAFE Environmental Function typically performs intergovernmental coordination in cooperation with the responsible HQ USAFE staff elements, including Public Affairs and International Law, EUCOM, the appropriate Office of Defense Cooperation, and the appropriate EEA, as required. This applies in general, to any contacts with government authorities, and specifically to matters regarding agreements, consultations, negotiations or establishment of standards or any other environmental policy related issue. This does not apply to routine daily activities and relations between the ICPM and local environmental authorities.

**5.2. Release of Documents.** In coordination with the EEA, the DOD component may furnish documentation on contaminated sites to HN government enforcement officials upon request or may authorize release of the documentation by the appropriate authority. The release of cleanup program documents must be based on an official request by HN authorities to the respective installation personnel or the HQ USAFE Environmental Function, including, if possible, a written statement of the purpose for which the information is being sought. The response to the release request must be coordinated between the installation Environmental Function and the HQ USAFE Environmental Function. The HQ USAFE Environmental Function will then coordinate with HQ USAFE International Law, HQ USAFE Public Affairs, and Foreign Disclosure Office (HQ USAFE/ INXX), and other staff elements, as well as with the appropriate EEA. Requests from non-governmental authorities such as HN citizens, DOD employees, and/or DOD contractors must be processed according to the DOD Regulation 5400.7 \_ Air Force Supplement, *DOD Freedom of Information Act Program*.

## **6. Programming and Budgeting:**

**6.1. Spill Cleanup Sites.** As with other sites, the HQ USAFE Environmental Function will fund each phase of the cleanup program once the spill site transitions from response to cleanup action. Funding is provided based on validated program requirements identified by USAFE installations. Funds requests for fund types other than environmental compliance, e.g., Defense Energy Support Center (DESC), must be processed through the HQ USAFE Environmental Function (installation personnel should contact their local resources POC for additional information on available funding alternatives and proper funds request procedures). As cleanup program requirements are identified, installation cleanup program managers must program the cleanup of the site into ACES as a Level 1 cleanup project and use the appropriate 535 series Element of Expense Investment Codes (EEIC). If the risk assessment determines a risk to MOSH exists, the RAMP must be submitted through the appropriate channels. Only once the RAMP is coordinated and approved will the project be funded.

**6.2. Environmental Remediation Sites.** Funds for conducting each phase of the program are provided by or through the HQ USAFE Environmental Function. As cleanup program requirements are identified, installation cleanup program managers must program their requirements in ACES as a Level 1 cleanup project, if appropriate, or as a Level 0 Operations and Services (O&S) requirement and use the appropriate 535 series EEICs. Resource requirements are forecasted by the installation on an annual basis for the next six years.

**6.3. Tracking Funds.** Funds used for the USAFE cleanup program must be tracked to ensure accurate projections of funding requirements, management of current funds, and verification of funds spent for each project for each fund type. In addition to tracking programmed and validated projects in ACES, data on funds issued, obligated, and expensed must be tracked and documented for each Level 1 project and O&S requirement.

**7. Remediation Impacts on Construction Projects.** There are many examples of construction projects where cleanup of environmental contamination, whether previously known or unknown, becomes an issue during the project execution phase of new construction or other projects not originally slated as environmental cleanup projects. This potentially creates major project delays and cost overruns. By considering the following concepts during the programming phase of construction projects, many obstacles to project completion can be avoided.

7.1. **Coordination Requirement.** Coordination of a proposed project's site with the ICPM is absolutely critical. Avoiding known contaminated areas altogether is the best way to prevent resource and time delay impacts to the construction project due to cleanup requirements.

7.2. **Be sensitive to funding nuances.** The normal work classification for environmental cleanup is "repair." Separating the cleanup from the rest of the project and classifying it as "repair" can protect statutory limitations for the Operations and Maintenance (O&M) construction portion of the project. The portion of the cleanup that does not directly impact the construction area is funded with environmental compliance funds. An example is when a contamination plume covers more than just the construction site. The portion of the cleanup directly associated with the project is programmed as "repair," using project O&M funds. For military construction (MILCON) projects, cleaning up within the MILCON project site is funded with MILCON funds. Cleaning up the remaining contamination becomes part of the installation's remediation program. However, a special situation may arise involving North Atlantic Treaty Organization (NATO) or payment-in-kind funded construction requiring a project specific review to determine funding responsibility through the HQ USAFE Environmental Function and HQ USAFE International Law.

7.2.1. If an installation has its own contaminated soil treatment facility, it may be possible to program the treatment of the project-related contaminated material as another phase of the project depending on the treatment facility's capacity and backlog of contaminated soil. Repair funds from the project pay for any required storage as well as ultimate treatment of the contaminated soil removed as part of the project.

**8. Environmental Management of DOD Inactive and Active Ranges Overseas.** For the protection of all DOD personnel and the public from explosives hazards on DOD's active and inactive ranges located in the USAFE AOR, follow the procedures specified in DOD Directive 4715.12, *Environmental and Explosives Safety Management on Operational Ranges Outside the United States*.

DANNY K. GARDNER, Brigadier General, USAF  
Director, Installations and Mission Support Directorate

**Attachment 1****GLOSSARY OF REFERENCES AND SUPPORTING INFORMATION*****References***

Deputy Secretary of Defense Memorandum, *Environmental Remediation Policy for DOD Activities Overseas*, 18 Oct 95

DODI 4715.5, *Management of Environmental Compliance at Overseas Installations*, 4/22/1996

DODI 4715.8, *Environmental Remediation for DOD Activities Overseas*, 2/2/1998

DODD 4715.12, *Environmental and Explosives Safety Management on Operational Ranges Outside the United States*, 7/12/2004

DOD 5400.7\_AFSUP, *DOD Freedom of Information act Program*, 24 June 2002

AFPD 32-70, *Environmental Quality*, 20 July 1994

AFI 32-7006, *Environmental Program in Foreign Countries*, 29 April 1994

AFMAN 37-123, *Management of Records*, 31 August 1994

AFI 91-204, *Safety Investigations and Reports*, 14 February 2006

ED 80-2, *Environmental Executive Agent Remediation Policy*, current edition

***Abbreviations and Acronyms***

**ACES**—Automated Civil Engineer System

**AF**—Air Force

**ANG**—Air National Guard

**AOR**—Area of Responsibility

**BBP**—Bullet Background Paper

**BCE**—Base Civil Engineer

**BSE**—ACES System Code: Project status when project is submitted for HQ PM review and validation

**CCPM**—Command Cleanup Program Manager

**COMUSAFE**—United States Air Forces in Europe Commander

**DISCO**—Discovery Phase

**DOD**—Department of Defense

**EEA**—Environmental Executive Agent

**EEIC**—Element of Expense Investment Code

**ESOHC**—Environmental Safety and Occupational Health Council (replaced EPC)

**ED**—EUCOM Directive

**EUCOM**—United States European Command

**FGS**—Final Governing Standards

**FINPLAN**—Financial Plan

**FY**—Fiscal Year

**GIS**—Geographical Information System

**GSU**—Geographically Separated Unit

**HN**—Host Nation

**IA**—International Agreement

**ICPM**—Installation Cleanup Program Manager

**ID**—Identification

**KISE**—Known Imminent and Substantial Endangerment to Human Health and Safety

**MAJCOM**—Major Command, e.g., USAFE

**MILCON**—Military Construction

**MNA**—Monitored Natural Attenuation

**MOB**—Main Operating Base

**MOSH**—Maintain Mission Operations or Protect Safety and/or Human Health

**OEBGD**—Overseas Environmental Baseline Guidance Document

**O&M**—Operations and Maintenance

**O&S**—Operations and Services

**PA**—Programmed Amount

**POC**—Point of Contact

**POL**—Petroleum, Oils and Lubricants

**POM**—Program Objective Memorandum

**PPDA**—Potential Pollutant Discharge Area

**PRG**—ACES System Code: HQ Submitted to Air Staff for review

**RAMP**—Remedial Action Management Plan

**SOW**—Statement of Work

**US**—United States

**USAFE**—United States Air Forces in Europe

**USAFE/CV**—Vice Commander, United States Air Forces in Europe

**USEUCOM (EUCOM)**—United States European Command

### *Terms*

**Active Site**—Any site that has not been excluded or completed. For example, suspected sites, sites under assessment, and sites under remediation are all considered active sites.

**Closed Site**—Any site that has been completed or excluded. Sites with monitored natural attenuation in place for at least 5 years are documented as completed, if the base ESOHC believes sufficient progress has been achieved (see [Attachment 7, A7.5](#)).

**Closure Percentage**—A base's closure percentage is calculated by dividing the number of closed sites by the total number of sites in the program.

**Competent Risk Assessor**—A person who, by way of training and/or experience, is knowledgeable of applicable standards, is capable of identifying hazardous or dangerous conditions relating to the specific site, and is designated by the employer. Some standards may add additional specific requirements, which must be met by the competent person.

**Completed Site**—A contaminated site for which remedial action has been taken under Phase 4 of the Cleanup Program (Remedial Action) and the final risk and cleanup level have been reached. The installation ESOHC recommends completion and the HQ USAFE ESOHC Cleanup Subcommittee makes a final decision as to whether or not a remedial action is satisfactory in accordance with subject guidance and the applicable DOD and EUCOM policy.

**Confirmed Contaminated Site**—A site where remedial action is being recommended by the installation ESOHC or installation commander in accordance with subject guidance.

**Contaminated Site**—This is a specific area of land or water polluted by POL or hazardous substances, where:

- a. the contamination was caused by past, terminated, or present but uncontrolled or uncontained DOD activities,
- b. the source of contamination is an identified point source (defined area, or facility), and
- c. the installation ESOHC Cleanup Subcommittee or installation commander determined that the polluted site poses a threat to human health and safety, or to current operations, and must undergo a risk assessment.

**Contamination**—The presence of contaminants in the environment or in mixtures with the environmental media (soil, water, or air), in concentrations higher than those generally recognized to be a *de minimus* threat to human health or the environment. Concentration levels of substances considered to be a threat to human health or the environment will be identified from applicable standards on a case-by-case basis through the USAFE ESOHC Cleanup Subcommittee. HN legislation or the local jurisdiction in which the installation is located, or AF- and USAFE-imposed standards could be a source of information to establish standards.

**Environment**—Includes water, air, and land and the interrelationships existing among and between water, air, and land and all living things.

**Excluded**—A suspected contaminated site that is not classified as a contaminated site during Phase 2 of the Cleanup Program (Validation), or a contaminated site that is identified in Phase 3 of the Cleanup Program (Risk Assessment) as requiring no remediation because the site poses no threat to human health,

failure to remedy the site does not pose a threat to current operations, or USAFE organizations are not authorized to remedy contamination at the site.

**Final Governing Standards**—Country-specific environmental compliance requirements with which DOD installations in overseas locations must comply. In the absence of country-specific FGS, DOD installations must comply with the OEBGD.

**Final Risk Level**—A cleanup standard established by the HQ USAFE ESOHC or through negotiations with HN environmental authorities. Any negotiations on cleanup standards have to be managed and approved by HQ USAFE International Law and the HQ USAFE Environmental Function.

**Geographically Separated Unit**—Part of a military organization separated geographically from its parent military organization.

**Hazardous Substance (including POL Products)**—Any material capable of posing an unreasonable risk to human health and safety or the environment if released to the environment. This includes material that qualifies as either a hazardous material or hazardous waste under the applicable country-specific FGS or (in countries where there are no FGS) the OEBGD. POL products refers to petroleum, oils and lubricants, including mogas and hydraulic oils. They consist of hydrocarbons and different fuel additives, where the additives often present the real risk to soil or groundwater resources and might qualify as a hazardous substance.

**Installation**—A base, camp, post, station, yard, center, or other activity (e.g., a geographically separated unit) under the jurisdiction of the Secretary of a Military Department that is located outside the United States and outside any territory, commonwealth, or possession of the United States.

**Intergovernmental Coordination Process**—Process identifying the appropriate entities required to be involved during negotiations between installation representatives and the local and national government authorities regarding remediation of contaminated sites. Country specific requirements are detailed in the appendices to EUCOM Directive 80-2, *Environmental Executive Agent Remediation Policy*.

**Main Operating Base**—A DOD installation with essential buildings and facilities provided for total organization and intermediate maintenance capability existing for assigned weapon systems. The intermediate maintenance capabilities may be expanded to support specific weapon systems deployed to the MOB.

**Overseas Environmental Baseline Guidance Document**—Implementation guidance, procedures, and criteria for environmental compliance at DOD installations in overseas locations. The OEBGD is used by the EEAs to develop FGS and, in the case where no county-specific FGS exist, provides the compliance criteria for use by the DOD installations.

**Pathways**—Route a pollutant travels or might travel to move from its source to a receptor.

**Pollutant, Contaminant, and Contamination Pollutant**—A substance present in greater than natural concentration as a result of human activity that has a net detrimental effect upon its environment or upon something of value in that environment, causes deviations from the normal composition of an environment or an environmental media (soil, water, or air), or may be a risk to human health or DOD operations.

**Potential Pollutant Discharge Areas**—DOD-controlled areas with facilities, structures, and/or permanent or temporary operations, including compliance sites, where the existing, available potential of hazardous material or hazardous substances could be accidentally released into surface waters, soil, or

groundwater. A site is not considered a suspected contaminated site as long as no pollution or contamination is suspected. Sources of air emissions will not be considered under subject guidance as long as no surface pollution results from discharges or releases from those sources of air emissions.

**Reactivated Site**—A site that was previously closed but changing conditions (i.e. more stringent laws, new contamination, etc) make it necessary to re-examine the contaminant levels and perhaps take further remedial action. Reactivated sites shall retain the original contaminated site identification (ID) number issued by the base and the status of the site changes from closed to open. The reactivation decision, including date and reason, must be documented in the remarks column of the contaminated sites list.

**Receptors**—Human or ecological entities likely to be exposed to the contaminants identified.

**Remedial Action Management Plans**—Document serving as a decision document presenting the official opinion of the installation commander and bioenvironmental engineer with regard to human health risk. The project or site specific RAMP summarizes the results of the site risk assessment and recommends a method of remedial action to cleanup the site. RAMPs must be submitted to the USAFE ESOHC Cleanup Subcommittee for coordination with the proper approval authorities, to include the EEA, prior to receiving funds. If, for whatever reason, funds have already been sent to the installation, the installation must obtain the appropriate approval of the RAMP prior to obligating the funds.

**Remediation or Remedial Action**—Actions taken at a contaminated site to abate the effects of environmental contamination on human health and safety, and/or current operations. Remediation at a site can range from total cleanup (abatement to the final risk level) to passive monitoring of a site.

**Sites Under Remedial Action**—Sites where pollution of soil or groundwater requires remedial design and/or remedial action.

**Sites Under Risk Assessment**—Sites validated by the installation ESOHC Cleanup Subcommittee or installation commander and prioritized for further assessment regardless if they have been funded or not.

**Site Validation and Validation Team**—The installation ESOHC Cleanup Subcommittee validates “suspected and contaminated sites” according to subject USAFE guidance. The installation ESOHC Cleanup Subcommittee is the Installation Validation Team.

**Spill or Release**—A “release,” “spill,” or “spillage” as used in subject guidance, is a release of hazardous substance into the environment regardless of the cause. A release or spill is an acute occurrence resulting from current operations. The general policy for spill prevention and response planning is defined in Chapter 18 of each country-specific FGS and the OEBGD, which implements DODI 4715.5, *Management of Environmental compliance at Overseas Locations* and applies in countries where there are no FGS. The USAFE Spill Prevention and Response Policy provides additional guidance.

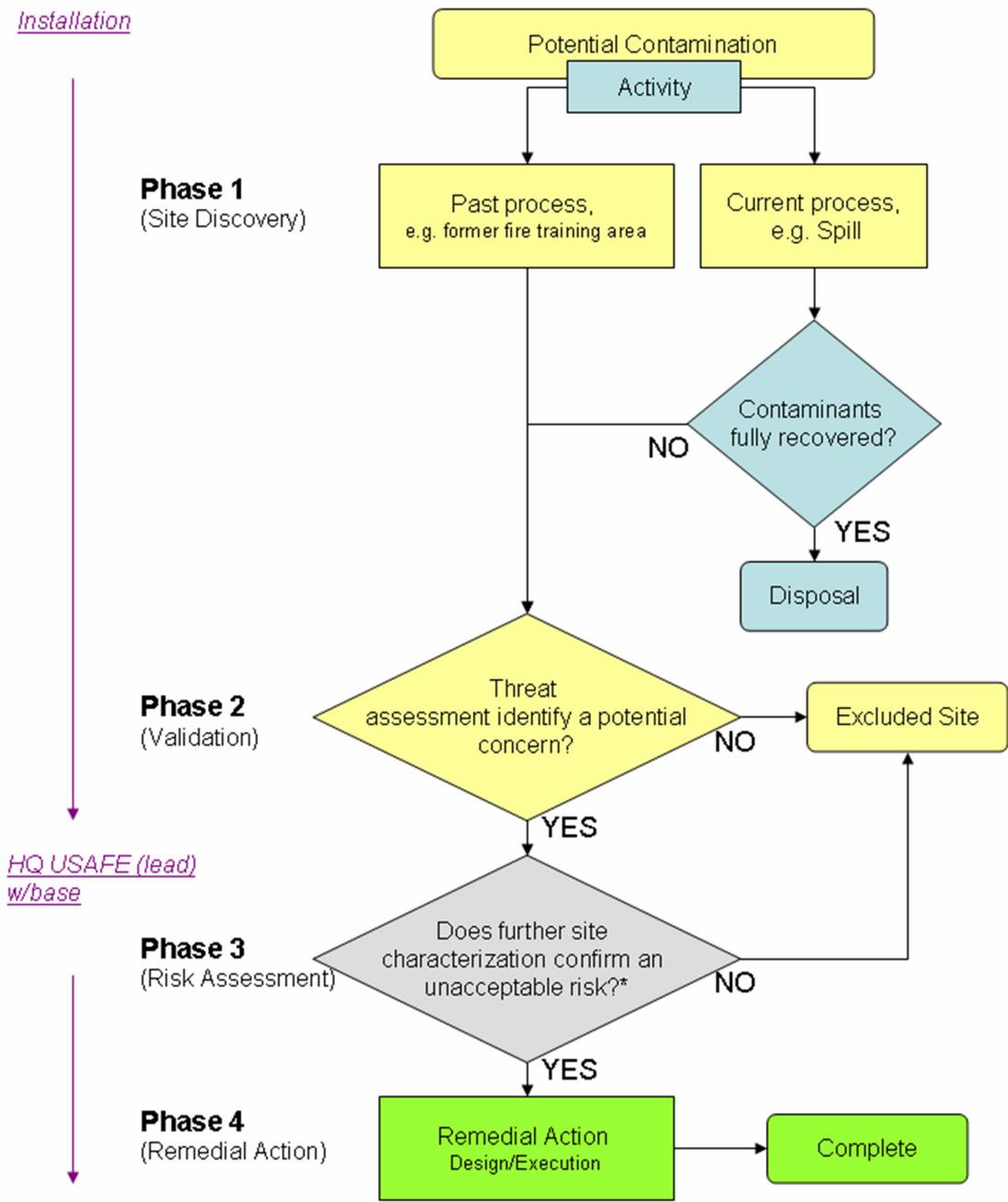
**Suspected Contaminated Site**—Any specific area of land or water identified during Phase 1 of the Cleanup Program as possibly being contaminated (determined by documentation or observation) by POL or hazardous substances from DOD activities and not classified as being a contaminated or excluded site under Phase 2 (Validation) or Phase 3 (Risk Assessment) of the cleanup program.

Attachment 2

USAFE CLEANUP PROGRAM OVERVIEW

A2.1. Overview. The following graphic displays the USAFE Cleanup Program Overview.

Figure A2.1. USAFE Cleanup Program Overview.



\*Risk to current operations, human health/safety, international agreement with EEA consultation and HQ USAFE/A7C approval

**Attachment 3**

**HQ USAFE THREAT ASSESSMENT WORKSHEET**

**A3.1. Site Validation.** During Phase 2 Validation, the installation ESOHC Cleanup Subcommittee must conduct site validations for all sites at their installation(s) suspected of being contaminated and posing an unacceptable risk to human health or the overall operations at the installation.

**A3.2. Assessment Tool.** The validation team members may use this USAFE Threat Assessment Worksheet or another tool deemed appropriate by the installation bioenvironmental engineers to help assess and document the potential threat from the contaminated site.

**Table A3.1. Threat Assessment Worksheet.**

<b>Site:</b>					
<b>Number:</b>					
<b>Date:</b>					
<b>SOURCE - PATHWAY RECEPTOR?</b>	<b>Contaminants Identified</b>	<b>Surrounding Medium Type/ Character</b>	<b>Pathway Release Potential</b>	<b>Endangered Receptors</b>	<b>Threat</b>
Medium Contaminated	N=None P=Potential K=Known		-Not possible -To surrounding medium - Pollution present	-No receptors  -Human health/ safety  -Water supply zones  -Groundwater  -Food chain  -Other (specify)	-No threat  -Low  -Potential  -Imminent  -Unknown
<b>Air</b> - Exposures possible? - To which receptor					
<b>Surface Water</b> - Toxicity - Spread - Accumulation					

SOURCE - PATHWAY RECEPTOR?	Contaminants Identified	Surrounding Medium Type/ Character	Pathway Release Potential	Endangered Receptors	Threat
<b>Topsoil</b> - Toxicity - Permeability - Spread out character - Retention capacity					
<b>Subsoil/Rock</b> - Toxicity - Permeability - Spread out character - Retention capacity					
<b>Groundwater</b> - Toxicity - Spread mobility - Accumulation - Aquifer type					
				<b>YES</b>	<b>NO</b>
Substantial Endangerment to Human Health & Safety					
Required to Sustain Current Operations					
IAW International Agreement					
<b>Imminent Threat (Immediate Action Required)</b>					

## Attachment 4

### REMEDIAL ACTION MANAGEMENT PLAN (RAMP) CRITERIA

**A4.1. Guidelines for Developing a RAMP.** A RAMP is the USAFE document intended to comply with the "Decision Document" requirement of EUCOM Directive 80-2. A RAMP must be generated and processed prior to initiating a remedial action. Proper coordination ensures the desired level of consistency of DOD remedial actions throughout the EUCOM theater, matching the appropriate remedial action to the specific situation that must be addressed. The RAMP format follows the format required by ED 80-2, but includes some USAFE-specific information. The standardized format is presented below with clarification provided as necessary.

#### **A4.2. Required RAMP Format:**

A4.2.1. **Unique Title/Number for Tracking.** The title should clearly identify the purpose of the document, the installation, the site designation (consistent with designation provided in quarterly data calls), and the associated project number for the remedial action (if contracted). A suggested format would be:

Remedial Action Management Plan (RAMP) for

*<Installation name>, <country>*

USAFE Site: *<site designation>*

Project number: *<ACES project number>*

#### **1. Project Description:**

- a. **Location** - Describe location on the installation with respect to facility numbers, activity, or other appropriate means of orientation.
- b. **Brief history of site** - Briefly describe the contamination found, cause of the contamination, when the contamination occurred, and former use and current operations at the site.
- c. **Source of contaminants and extent** - Provide available details on the lateral and vertical dispersment of contamination and any remaining sources, e.g., buried drums.
- d. **Contaminants of concern** - Identify the specific contaminants required to be addressed by the remedial project, i.e., contaminants exceeding the acceptable levels at the site. Identify any other contaminants if they may effect or be affected by the remediation effort.
- e. **Investigations performed and outcome** - Summarize each relevant investigation and the associated results.
- f. **Other pertinent information** - Provide additional information that may influence the need for a specific type of remedial action or implementation schedule, e.g., site is in a groundwater protection zone, contamination has or is expected to migrate off the installation, etc.
- g. **Applicability** - Verify the situation meets the three criteria identified below.
  - i Action not incidental to construction (i.e., minimal soil contamination within construction footprint)
  - ii Contamination is US caused

iii Action not covered under FGS (i.e., spill response)

2. **Justification.** Identify the most appropriate of the three specific justifications listed below as the justification supporting the site remediation effort. This same justification should also be stated in the cover letter and/or forwarding memo used to transmit the RAMP.

a. **KISE** - "Prompt action must be taken to remediate contamination at *<the site>* that presents known imminent and substantial endangerments to human health and safety due to environmental contamination caused by DOD operations located on or emanating from a DOD installation." This justification requires a signed statement from the installation medical authority, i.e., the bioenvironmental engineer, supporting the KISE statement.

b. **MOSH** - "The *<installation commander or installation ESOHC chairman>* has determined that remedial action measures at *<the site>* are required to maintain operations or to protect human health and safety at the installation or off the installation." This justification requires a signed statement from the installation commander or designated representative supporting operational and/or health and safety necessity.

c. **International Agreement** - "The *<installation commander or other identified official>* has determined that funding environmental remediation of *<the site>* is required by the provisions of an applicable international agreement." This justification requires a signed statement from USAFE or installation legal counsel supporting the legal necessity.

3. **Time Constraints.** Provide information on any HN imposed programming concerns including timelines and proposed start date.

#### 4. **Risk Assessment Executive Summary:**

a. **Contaminants of concern** - Identify contaminants required to be addressed by the remedial action.

b. **Pathways** - Identify all potential routes from the contaminated site to receptors.

c. **Receptors** - Identify human individual(s) potentially subject to the hazard of exposure from the contaminants of concern.

d. **Methodology** - Can be limited to one sentence which states the source of the methodology for example, Bundesbodenschutzgesetz, EPA, or Dutch protocol.

e. **Conclusion including impacts to human health and safety** - Include adequate background information to justify health and safety necessity if the commander is using MOSH to justify the remediation.

5. **Mission impacts and HN considerations** - Statement including adequate background information to explain the operational situation if the commander is using MOSH to justify the remediation and any consultations with the HN.

6. **Proposed cleanup goals** (may be in tabular format). Must include at a minimum:

a. Contaminant/maximum contaminant concentration encountered,

b. Source of established cleanup goal (regulatory authorities or HN law), and

c. Required clean-up level.

**7. Recommended remediation method:**

a. **Remediation method selected** - Explain why this method was chosen and the project timeline before the cleanup goal is reached.

b. **Other remediation methods considered** - Include reason(s) for non-selection of alternative remediation methods.

**8. Alternatives to remediation considered** - Discuss any alternatives to remedial action that were considered (such as relocation of the operation, change in mission, etc). Summarize each and include a timeline, if appropriate.

**9. Risk management considerations.** Include relevant discussion on issues concerning:

a. Health and safety,

b. economics,

c. technical,

d. operations,

e. politics,

f. information management plans/risk communication proposals, and

g. extent of contamination including possible migration off-site (if data available).

**APPENDICES:** Below are suggested appendices to the RAMP document

**Appendix A: Pertinent Correspondence (if Applicable)**

a. Signed letters supporting the selected justification (if available), reference para. 2.

i. Medical authority opinion for KISE justification,

ii. Installation commander statement of operational necessity or health and safety need and why, or

iii. Legal counsel statement that proposed action is required based on an international agreement and why.

b. Pertinent HN correspondence.

**Appendix B: Figure(s)** - Provide any supporting diagrams, photos, cost/budget constraints/numbers, etc.

**Appendix C: Cost Estimate for Proposed Remedial Action** (optional).

**A4.3. Special Procedures for KISE situations.** A situation presenting a known imminent and substantial endangerment to human health and safety or mission operations requires immediate attention to avoid unacceptable impacts. An installation believing the basis of a remediation is KISE must contact the HQ USAFE Environmental Function by the most appropriate and expeditious means available under the circumstances. The HQ USAFE Environmental Function will, in turn, consult with the appropriate EEA by the most appropriate and expeditious means available under the circumstances. The installation must prepare an abbreviated version of the RAMP described above, including the opinion of the DOD medical authority to generate a formal record supporting the remediation. Remediation beyond KISE will require a formal RAMP submittal.

## Attachment 5

### USAFE ENVIRONMENTAL CLEANUP PROGRAM GOALS AND OBJECTIVES

**A5.1. Purpose:** To establish goals for the Environmental Cleanup Program and procedures for tracking progress toward those goals in accordance with Objective 9 of the AF Environmental Strategic Plan.

**A5.2. Applicability and Scope:** This policy applies to USAFE Environmental Offices and their associated cleanup program managers.

**A5.3. Goals and Objectives:** The success of the cleanup program in USAFE will not be measured solely by the number of projects executed or by the amount of money spent. The programs success will ultimately be measured by its ability to clean contaminated sites. Therefore, it is important to establish clear goals steering the program toward a desired end state and then measure progress along the way. The following goals will serve as our targets.

A5.3.1. Initiate risk assessment of all suspected sites within two years of discovery.

A5.3.2. Close 80% of all sites by 2008.

A5.3.3. Close 90% of all sites by 2012.

A5.3.4. Close 98% of all sites by 2016.

A5.3.5. Ensure that within 18 months of discovering a new suspected site or re-scoping an existing contaminated site, either the site is formally excluded or risk assessment actions have been completed.

A5.3.6. For each active site, ensure remedial action is initiated within 3 years of completing the risk assessment for the site.

**A5.4. Assumptions:** The HQ USAFE Environmental Function expects to close 40-45 sites per year, while initially adding 30-40 sites per year through spills and new site discoveries. Over time, improved spill prevention measures and a reduction in new land acquisitions will reduce the expected rate to 7-10 per year. Some sites are so complex they will require more than 20 years to meet acceptable contaminant levels, so closing them by 2016 is unrealistic.

**A5.5. Tracking progress:** In order to measure progress toward these targets, each ICPM must submit the following information to CCPM on a quarterly basis.

A5.5.1. Quarterly updates (due 15 Jan, 15 Apr, 15 Jul, 15 Oct).

A5.5.1.1. An updated contaminated sites list using the current data call format.

A5.5.1.2. Explanations for all new sites added to the program in the last quarter to include site ID, site description, and reason for addition (i.e. spill, new discovery, new land acquisition) in the contaminated sites list of the current data call format.

A5.5.1.3. Documentation of all ESOHC site closure (exclusion/completion) decisions made in the last quarter including a formal site closure report (see [Attachment 7](#)).

A5.5.1.4. Cleanup status chart using the current data call format.

A5.5.2. Annual updates (due 15 Oct).

A5.5.2.1. All the same information required for quarterly updates.

A5.5.2.2. An updated base map in electronic format showing contaminated sites.

A5.5.2.3. A time-phased plan depicting the actions (e.g. risk assessment, remedial action, etc) required to close each active site on the installation(s).

**A5.6. Local Measurement.** Each Environmental Office shall create a chart similar to the one in the quarterly cleanup data call to measure and track progress toward the command goals. This chart will be reviewed at installation ESOHC, or ESOHC subcommittee meetings. The roll-up chart for the command will be briefed to USAFE/CV at USAFE ESOHC meetings.

## Attachment 6

### ENVIRONMENTAL CLEANUP PROGRAMMING STANDARDS

**A6.1. Purpose.** To standardize the process of codifying projects in ACES, thereby improving the bases' ability to advocate for and receive funding they need to properly execute the environmental cleanup program.

**A6.2. Applicability and Scope.** This policy applies to all Environmental Flights in USAFE that program restoration projects in ACES.

#### **A6.3. Terms and Definitions:**

A6.3.1. Submitted. A project must be submitted from the base to HQ USAFE via ACES from review and validation. An officially submitted project will have a status code of "BSE" in ACES.

A6.3.2. Validated. Once a base submits a project, the CCPM reviews the project and either validates, rejects, or requests more information on the project. A validated project is one that has received initial approval from the CCPM, but must still get final approval from the Chief of the HQ USAFE Environmental Function before being added to the program. Note that the environmental program is not always fully funded, so even validated projects may need to compete for funding during the programmed year.

A6.3.3. Programmed. Once a validated project receives approval from the Chief of the HQ USAFE Environmental Function, the ACES project status changes to "PRG" and the project is officially added to the environmental Program Objective Memorandum (POM) submittal and/or the Financial Plan (FINPLAN). If a project does not have a status of "PRG" in the year of execution, it will not receive funding.

#### **A6.4. Annual Programming Milestones.**

A6.4.1. POM. The POM is the DOD mechanism for accomplishing long-term budgetary planning. The POM review process starts every year in early Nov and the USAFE POM submission is finalized in Jan. To be considered in the POM, all projects must be submitted in ACES by **31 Oct**. The POM does not affect the current FY or the next FY. So project submissions must be limited to those required in FY+2 thru FY+8.

A6.4.2. FINPLAN. The FINPLAN is a statement of intent, completed in Mar of the current FY, which describes how the command intends to spend the money it receives in the next FY. Monetary targets used in the FINPLAN are derived from the President's Budget, a result of the POM process. If a base wishes to add a project for consideration in the FINPLAN, the project must be submitted in ACES by **31 Jan** and the base must identify a project currently in the funded program that it will forego in order to pay for the addition.

A6.4.3. Remedial Action Management Plans: Bases must complete the EEA consultation process by means of a RAMP before any funding will be provided for remedial action.

A6.4.4. End of Year. Every year there is an opportunity to buy out part of the next year's budget by using money that gets redistributed at the end of the fiscal year. In order to be prepared to obligate funds quickly at the end of the FY, bases must submit a list of projects they can have under contract

within 15 days of receiving funds. The list must be submitted to the CCPM by **30 Jun**. The projects must already be validated and programmed in ACES.

**A6.5. Project Titles.** Project titles in ACES must begin with an action verb. Acceptable verbs are **assess, study, design, cleanup, or sample**. Very limited exceptions will be approved by MAJCOM. After the action verb, describe the site where the action will take place (e.g. fire training pit) followed by the phase number. Avoid the use of facility numbers. A single site ID number may be used if a text description of the site is impractical. If multiple sites will be addressed under a single project, describe the general category the sites fall under (e.g. tanks, drywells, etc.) or describe the area of the base to be addressed. Be as specific as possible. Vagueness implies the project is only a placeholder and thus vulnerable to being reduced or cut.

**A6.6. Programmed Amount (PA).** Programmed amounts should be constructed upon historical information drawn from similar projects executed in the past and be adjusted accordingly to account for cost changes such as new technologies, more commonly available technologies, and differing site conditions. For projects addressing multiple sites, assume all the sites will need an assessment. Assume only a percentage of the sites will need design and cleanup. A good rule of thumb is 60% will be excluded and 40% will need cleanup. Document your assumptions in the project description.

**A6.7. Project Description.** Clearly describe the scope of work and ensure it is consistent with the project title. Address unusual situations that may prompt questions by reviewers, e.g., if this is the third assessment at a site, provide an explanation why this is the case. This is where site ID numbers and facility numbers belong, especially if the project will address multiple sites. Provide a simple breakdown of the programmed amount to show the major cost elements. Document the assumptions used when developing the cost estimate. Provide detail on how PA was determined. If elements of the estimate were based on engineering principles, then state so. If the programmed amount cannot be adequately justified, the project may not be validated or funded.

**A6.8. Project Justification.** The FGS is not an adequate justification for a cleanup project. Use the ED 80-2 categories (KISE, MOSH, IA) to justify a cleanup project and explain why your project falls into a particular category. Assessment projects can be justified by referencing USAFEI 32-7067. This block should answer the question “What will the impact be if this project is not funded?”

**A6.9. Project Remarks:** Do not copy the project description and paste it in the remarks block. Project remarks should be unique information not covered in the description or justification. Explain special HN considerations, or ties to previous and subsequent phases of work.

**A6.10. EEICs:** Five-digit EEICs shall be used to clearly identify the type work being performed under a given project. The approved EEICs for USAFE cleanup are described below.

- A6.10.1. 535 **01**- Site Discovery.
- A6.10.2. 535 **02**- Validation.
- A6.10.3. 535 **03**- Risk Assessment.
- A6.10.4. 535 **04**- Remedial Design.
- A6.10.5. 535 **05**- Remedial Action.
- A6.10.6. 535 **06**- Operations and Services (O&S) Items.

## Attachment 7

### ENVIRONMENTAL CLEANUP SITE CLOSURE CRITERIA

**A7.1. Purpose.** To provide a command standard for site closure documentation and reporting.

**A7.2. Applicability and Scope.** This criteria applies to USAFE cleanup sites closed after Oct 03.

**A7.3. Documentation and Reporting of Closure Decision.** A formal site closure report must be created for each completed or excluded site. Reports must be forwarded to the CCPM at the end of the quarter in which the closure occurred at the same time as the data call (15 Jan, 15 Apr, 15 Jul, and 15 Oct). The closure report must be in the format shown in [Figure A7.1](#).

**A7.4. Monitored Natural Attenuation (MNA).** Bases must submit a MNA Plan to the CCPM for all sites where MNA will be the chosen course of action. The plan must contain:

A7.4.1. Final target contaminant concentrations.

A7.4.2. Estimated time needed to reach final targets.

A7.4.3. Scope of monitoring required.

A7.4.4. Progress that can be expected within 5 years.

**A7.5. Cleanup Target.** If the base ESOHC believes sufficient progress has been achieved in the first 5 years of monitoring, the site may be documented as closed although the base may chose to continue monitoring until cleanup targets are reached.

Figure A7.1. USAFE Cleanup Site Closure Report.

### USAFE CLEANUP SITE CLOSURE REPORT

Base Name	
Site ID	
Site Description	
POC Name/DSN Phone	

Milestone	Date
<b>Phase 1:</b> Discovery	
<b>Phase 2:</b> Validation	
<b>Phase 3:</b> Risk Assessment Completion	
<b>Phase 4:</b>	
EEA Consultation Completion	
Remedial Design Completion	
Remedial Action Start	
MNA Start	
MNA Completion	
Acceptance from responsible host nation authority (e.g., MOD, State Authority, Defence Estates)	
Remedial Action Completion	
Exclusion (if applicable)	Rationale:

Site Area (square meters)	
Soil Type(s)	
Contamination Depth (meters bgs)	
Remediation Method(s)	

<b>Project Number(s)</b>	<b>Cost (\$K)</b>
Risk Assessment	
Remedial Design	
Remedial Action	

<b>Contaminants of Concern</b>	<b>Media</b>		<b>Initial Concentration</b> (include units)	<b>Final Concentration</b> (include units)
	<b>Soil</b>	<b>GW</b>		