

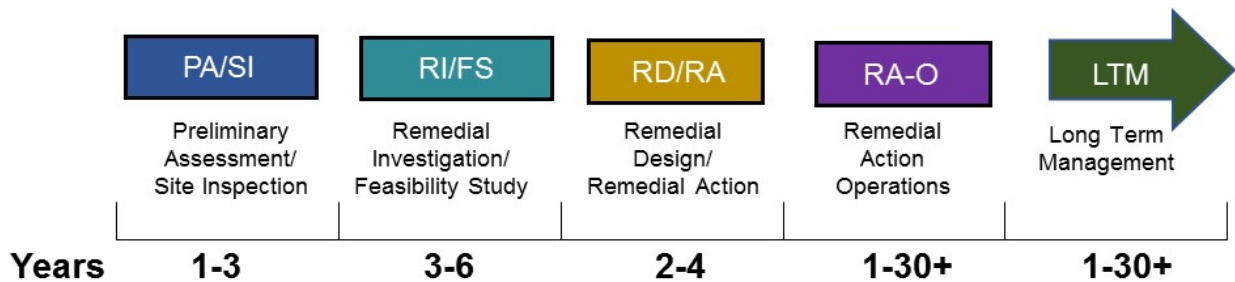


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# FACT SHEET CERCLA PROCESS

The Army’s Environmental Restoration Program addresses hazardous substances, pollutants, contaminants and military munitions resulting from past activities at Army installations. Its mission, along with protecting human health and the environment, is to enable readiness by returning Army lands to usable condition. The Restoration Program accomplishes this by performing appropriate, cost-effective remediation of contaminated sites using the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) process, which provides a consistent, risk-based approach across the Nation for cleanup.

The following section summarizes the major CERCLA phases and milestones, although actual timing and scope of response actions will be tailored to site conditions and funding priorities. The timeline below represents the typical timeline for an installation restoration program (IRP) site. A munitions response site usually requires a much longer time to complete the RD/RA phase, approximately 2-10 years. Note that all sites do not have to progress through all phases. For example, no further action may be required at the end of the PA/SI or RI/FS phases. Also, some sites may not require either an RA-O or LTM phase if response actions completed during the RD/RA phase are sufficient to clean up the site.



**Preliminary Assessment (PA)** – Determines whether a release of a hazardous substance or pollutant or contaminant may have occurred, potential sources and type of releases, along with an evaluation of a site’s relative risk and recommendations on need for subsequent phases in the cleanup process or no further action. This phase involves steps such as reviewing historic operations, documents, and maps located both on installations and in the national archives, as well as interviewing Service members and civilians who have historic knowledge of the operations that may have contributed to a potential release. Army summarizes the information in a draft PA report that goes through an internal review and is then provided to the regulators for review.

**Site Inspection (SI)** – Characterizes the presence or absence of contamination, and determines the next appropriate phase for sites identified during the PA, or for munitions response areas. This is accomplished through a site visit and typically involves sampling environmental media and collecting and analyzing other data to determine the need for further action. Army compiles information collected during the SI into a draft report that includes the history of the site, maps, sampling





U.S. ARMY

## FACT SHEET CERCLA PROCESS

locations and results, and recommends whether the site should continue to the RI/FS phase.

**Hazard Ranking System (HRS) Score** – Environmental Protection Agency (EPA) does this, not Department of Defense (DoD). HRS assesses four pathways of human exposure: groundwater, surface water, soil and air. If score is 28.5 or higher, the site is proposed for listing on the National Priority List (NPL).

**Remedial Investigation (RI)** – Determines the nature (types) and extent (vertical and horizontal boundaries) of contamination. This phase involves field investigations to characterize site conditions and to evaluate where the presence and level of any unacceptable risk to human health and the environment exists. The purpose of the RI is to “collect data necessary to adequately characterize the site for the purpose of developing and evaluating effective remedial alternatives.” (40 CFR 300.430d)

**Feasibility Study (FS)** – Develops and evaluates alternatives to address unacceptable risk to human health and the environment based on an established set of nine EPA criteria from the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The criteria evaluation allows the Army to identify the preferred remedial alternative. During this phase, Army develops, screens, and evaluates remedial alternatives in detail; assesses the performance of remediation options; and selects a permanent solution that is protective of human health.

**Proposed Plan (PP)** - Summarizes the RI/FS and describes the remedial alternatives, how they were evaluated, and how they compared to one another in each of the nine criteria. This phase identifies the Army’s preferred remedy for public and regulatory review and comment during a formal remedy selection process.

The public will be notified of the availability of the PP and provided not less than 30 calendar days to submit comments. A public meeting will be held during the public comment period. After the comment period, the PP is revised as needed in response to comment.

**Record of Decision (ROD)** – After consideration of comments received during the public comment period, the Army selects a remedial action alternative and announces that in a legal document (Decision Document (DD)) specifying the selected remedial alternative, including remedial action objectives that identify the cleanup level DoD is working to achieve.. The remedial action selected may or may not be the preferred alternative as described in the PP.





U.S. ARMY

## FACT SHEET CERCLA PROCESS

**Remedial Design (RD)/Remedial Action – Construction (RA-C)** – The final remedy documented in the ROD is designed and constructed and/or put in place at the remediation site. The RD may include a land use control (LUC) implementation plan, if LUCs are a required element of the selected remedial action. During the RA-C phase, Army constructs or implements the selected remedial alternative at the site. When RA-C is complete, the Army classifies the site as Response Complete (RC), if all cleanup goals have been met, or Remedy-in-Place (RIP) if remedial action operations are required to meet final cleanup goals over time.

**Remedial Action - Operation (RA-O)** – During the RA-O phase, Army operates, maintains, and monitors actions for the remediation system and site, until remedial action objectives (cleanup level) in the DD are achieved. Army measures cleanup progress against the RC milestone, which occurs when the cleanup activities are complete

**Long-Term Management (LTM)** - Following achievement of the RC milestone, Army may be required to monitor long-term protectiveness of the remedy during the LTM phase. The LTM phase is required when the remedial action objectives do not allow unrestricted use of the property. Actions during this phase may involve monitoring site conditions, implementing and managing LUCs, and performing 5-year reviews

**Site Closeout** – The point in the restoration process when cleanup goals that allow unlimited use and unrestricted exposure of the property have been met and the regulating authorities believe no further action or long-term management is warranted to protect human health and/or the environment.

**Five-year Review** - For any site not restored to a condition allowing unlimited use/unrestricted exposure, the protectiveness of the remedy is reviewed during a five-year or periodic review process.

NOTE: If EPA does not list a site on the NPL, and DoD determines the PA/SI results warrant additional remedial response or a removal action, DoD has authority under the DERP statute to perform remedial investigation and action at sites not on the NPL; however, if DoD elects to perform cleanup under DERP, all remedial and or removal actions must be executed consistent with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the National Contingency Plan.

