Sustainable Management of Available Resources and Technology (SMART) Cleanup

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**Report Documentation Page**

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Agenda

- SMART Cleanup
  - Introduction
  - Contributing Factors
  - Regulatory Drivers

- Benefits and Applicability of SMART Cleanup

- Upcoming Activities
SMART Cleanup

- SMART Cleanup is an initiative to place a higher priority on evaluating long-term future land use considerations during the remediation process.
  - Includes consideration of an installation’s Master Plan when formulating a site remedial strategy.
  - Allows for the efficient use of available funding.
  - Increases the flexibility of future Army land use and decreases overall long-term redevelopment costs.
Why SMART Cleanup?

- Master planning operations are under continued pressure to utilize an installation’s real property resources as efficiently as possible.

- Contributing Factors:
  - BRAC
  - Support of up-tempo activities
  - Neighboring community encroachment
Additional Planning Pressures

- Environmentally contaminated areas located on an installation further limit development opportunity.
  - Lower cost and shorter remedial timeframe have historically led to remediation to commercial/industrial standards.
  - Implementation of Land Use Controls (LUCs) has left residual contamination in place.
**Regulatory Drivers**

- **AR 210-20 - Real Property Master Planning for Army Installations**
  - Garrison commander’s responsibility to create a blueprint and vision that allows an installation to respond to future Army missions and community aspirations, while providing and maintaining the capability to train, protect, sustain, and support today’s force.
  - Establish installations as valued neighbors and trusted partners with surrounding communities.
  - Installations must be recognized as providing examples of excellent environmental stewardship.
  - The garrison commander’s instrument for installation real property management, is recorded in the installation’s real property master plan (RPMP).
  - RPMP covers a 20-year planning horizon, is adjusted semi-annually, and reviewed and updated at least every 5 years.
AR 200-1 - Environmental Protection and Enhancement

- Addresses environmental responsibilities for all Army organizations and implements Federal, State, and local laws and DoD policies for preserving, protecting, conserving, and restoring the quality of the environment.
- Imparts authority to the DASA (ESOH) to provide overall policy, advocacy, program direction, and oversight across installations, logistics, acquisition, and operations.
- Governs the majority of activities that are completed by installation-level environmental personnel on a daily basis.
- Stipulates that it is a garrison commander’s responsibility to ensure that an installation’s master plan incorporates environmental considerations.
AR 210-20 and AR 200-1 indicate that both planning and environmental tasks ultimately lie at installation level.

- Neither regulation stipulates exactly how personnel operating within the planning and environmental departments are to coordinate their activities.
- Regulations do not specifically stipulate who determines what a reasonable reuse is for a given site.
SMART Cleanup will:

- Develop a decision framework for coordinating long-term installation master planning efforts with environmental cleanup decisions.
- Highlight opportunities to encourage early discussions.
- Emphasize opportunities where investments of additional funding would yield long-term benefits.
- Facilitate mutually beneficial communication and decision-making between environmental and planning personnel.
- Outline continuous opportunities to revise decisions based on changing installation needs.

Better coordination between environmental and master planning communities could result in more efficient cleanup decisions, saving both time and money.
SMART Cleanup Applicability

- Applied to both new and existing sites on enduring installations.
- Sites presently undergoing remediation or long-term monitoring can be evaluated for additional remedial activities that would:
  - Reduce the overall duration of environmental remediation at a site;
  - Yield a cost savings; and/or
  - Increase in value to the Army through increased property reuse.
Multiple criteria will be considered when evaluating a site for additional cleanup activities.

The following decision matrix (draft) was designed to streamline the process and graphically depict key concepts.

The matrix is not final; the SMART Cleanup concept remains under development.
Initial Site Evaluation

1. Does site have contamination requiring ongoing cleanup?
   - Yes
   - No

2. Will the cleanup strategy leave contamination onsite above unrestricted reuse?
   - Yes
   - No

3. Is cleanup beyond planned restricted reuse technically feasible?
   - Yes
   - No

4. Is the site located on an enduring installation?

5. Has coordination with the Planning Department regarding options for future site reuse begun?

6. Will additional cleanup reduce future Army environmental liability?

7. Will mission needs lead to future or current issues regarding spatial limitations at the installation (e.g., T/E species, external encroachment, anticipated "gaining", needed housing/construction/daycare)?

8. Has site previously undergone cleanup activities?

9. Is site undergoing LTM or IC maintenance activities that require annual funding?

10. Will the additional cleanup result in a significant monetary ROI?

11. Will mission needs lead to future or current issues regarding spatial limitations at the installation (e.g., T/E species, external encroachment, anticipated "gaining", needed housing/construction/daycare)?

12. Does the additional SMART cleanup require additional funding?
   - Site is not eligible for additional SMART cleanup funding.
   - Site may be eligible for additional SMART cleanup funding.

Initiate documentation of need and forward to AEC.

Elevate site to ACSIM for further evaluation.

Complete Cleanup.

Environmental Department to initiate coordination.
Installation Criteria

2. Will the cleanup strategy leave contamination onsite above unrestricted reuse?

1. Does site have contamination requiring ongoing cleanup?

3. Is cleanup beyond planned restricted reuse technically feasible?

4. Is the site located on an enduring installation?

5. Has coordination with the Planning Department regarding options for future site reuse begun?

Environmental Department to initiate coordination

4. Is the site located on an enduring installation? Yes

5. Has coordination with the Planning Department regarding options for future site reuse begun? Yes

No

Environmental Department to initiate coordination

Yes

No
Liability and Monetary ROI Evaluation

1. Does site have contamination requiring ongoing cleanup?

2. Will the cleanup strategy leave contamination onsite above unrestricted reuse?

3. Is cleanup beyond planned restricted reuse technically feasible?

4. Is the site located on an enduring installation?

5. Has coordination with the Planning Department regarding options for future site reuse begun?

6. Will additional cleanup reduce future Army environmental liability?

7. Has site previously undergone cleanup activities?

8. Is site undergoing LTM or IC maintenance activities that require annual funding?

9. Will mission needs lead to future or current issues regarding spatial limitations at the installation (e.g., T/E species, external encroachment, anticipated "gaining", needed housing/childcare)?

10. Will the additional cleanup result in a significant monetary ROI?

11. Will additional cleanup assist the Army in meeting other priorities?

12. Does the additional SMART cleanup require additional funding?

Site is not eligible for additional SMART cleanup funding.
Site may be eligible for additional SMART cleanup funding.
Initiate documentation of need and forward to AEC.
Elevate site to ACSIM for further evaluation.

Determine parameters for ROI.
Evaluation of Spatial Needs or Other Army Priorities

1. Does site have contamination requiring ongoing cleanup?

2. Will the cleanup strategy leave contamination onsite above unrestricted reuse?

3. Is cleanup beyond planned restricted reuse technically feasible?

4. Is the site located on an enduring installation?

5. Has coordination with the Planning Department regarding options for future site reuse begun?

6. Will additional cleanup reduce future Army environmental liability?

7. Has site previously undergone cleanup activities?

8. Is site undergoing LTM or IC maintenance activities that require annual funding?

9. Will mission needs lead to future or current issues regarding spatial limitations at the installation (e.g. T/E species, external encroachment, anticipated “gaining,” needed housing/ construction/ daycare)?

10. Will the additional cleanup result in a significant monetary ROI?

11. Will additional cleanup assist the Army in meeting other priorities?

Site may be eligible for additional SMART cleanup funding.

12. Does the additional SMART cleanup require additional funding?

Site is not eligible for additional SMART cleanup funding.

Site may be eligible for additional SMART cleanup funding.
Activities After Eligibility

1. Does site have contamination requiring ongoing cleanup?

2. Will the cleanup strategy leave contamination onsite above unrestricted reuse?

3. Is cleanup beyond planned restricted reuse technically feasible?

4. Is the site located on an enduring installation?

5. Has coordination with the Planning Department regarding options for future site reuse begun?

6. Will additional cleanup reduce future Army environmental liability?

7. Has site previously undergone cleanup activities?

8. Is site undergoing LTM or IC maintenance activities that require annual funding?

9. Will mission needs lead to future or current issues regarding spatial limitations at the installation (e.g., T/E species, external encroachment, anticipated “gaining,” needed housing/construction/daycare)?

10. Will additional cleanup assist the Army in meeting other priorities?

11. Will the additional cleanup result in a significant monetary ROI?

12. Does the additional SMART cleanup require additional funding?

- Complete Cleanup.
- No
- Yes

- Initiate documentation of need and forward to AEC.
- Elevate site to ACSIM for further evaluation.
- Yes/No
Evaluation of Sites Without Required Cleanup

1. Does site have contamination requiring ongoing cleanup?

2. Will the cleanup strategy leave contamination onsite above unrestricted reuse?

3. Is cleanup beyond planned restricted reuse technically feasible?

4. Is the site located on an enduring installation?

5. Has coordination with the Planning Department regarding options for future site reuse begun?

6. Will additional cleanup reduce future Army environmental liability?

7. Has site previously undergone cleanup activities?

8. Is site undergoing LTM or IC maintenance activities that require annual funding?

9. Will mission needs lead to future or current issues regarding spatial limitations at the installation (e.g., T/E species, external encroachment, anticipated "gaining
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10. Will the additional cleanup result in a significant monetary ROI?

11. Will additional cleanup assist the Army in meeting other priorities?

12. Does the additional SMART cleanup require additional funding?

- Site is not eligible for additional SMART cleanup funding.
- Site may be eligible for additional SMART cleanup funding.

Initiate documentation of need and forward to AEC.
Elevate site to ACSIM for further evaluation.

Complete Cleanup.
The SMART Cleanup decision matrix is designed to be used on enduring installations only.

SMART Cleanup is an evaluation of the best practicable future use of a site, and is not always tied to additional cost-to-complete funding.

Only sites demonstrating a clear return on investment may be eligible for additional funding.

Not all sites will benefit from additional environmental remediation or additional funding.
Outcomes of SMART Cleanup

- SMART Cleanup places increased emphasis on the long-term evaluation of anticipated reuse of contaminated sites early in the remedial process.
- SMART Cleanup evaluation may provide justification for additional remedial funding.
  - Contaminated sites with a potential future mission need may warrant allocation of additional resources.
  - Additional investment may prove to provide long-term cost and time savings to the Army.
Upcoming Activities

- The decision framework will be pilot tested first on a site level, then on an installation level.

- Results of the pilot tests will lead to new guidance development as needed.
SMART Cleanup goals are not intended to be part of regulatory negotiation

SMART Cleanup goals are not intended to be enforceable by regulators
SMART Cleanup is an initiative to place a higher priority on evaluating long-term future land use considerations and future Army liability during the remediation process.

Benefits include:
- Increased communication between stakeholders;
- Reduction of the duration of environmental remediation at a site;
- Cost savings (decreased Army environmental liability); and/or
- Increase in value to the Army through increased property reuse.
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