

DEPARTMENT OF THE AIR FORCE
WASHINGTON DC

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OFFICE OF THE ASSISTANT SECRETARY

MEMORANDUM FOR AF/A4/7
SAF/IEI
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FROM: SAF/IE

SUBJECT: Policy for Refocusing the Air Force Environmental Restoration Program

In 1980 the U.S. Congress passed the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) to address the cleanup of past contamination sites in order to protect human health and the environment. In 1984 the Department of Defense (DoD) put into place the Defense Environmental Restoration Program (DERP), to address the "worst first" sites (those presenting the greatest risk to human health and the environment).

DoD's metrics for the DERP and Base Realignment and Closure (BRAC) environmental cleanup programs have evolved since 1984. One "key" metric that provides for initial protection of human health and the environment is achievement of "remedy-in-place" (RIP) for individual sites. At thousands of sites, the Air Force is well on its way to achieving those RIP goals. However, RIP accomplishes only part of what is necessary to fully clean up contaminated sites. After nearly 30 years, the Air Force still has many sites that require final cleanup and closure.

In our BRAC program, we have too many sites where our choice of remedies will prevent unconstrained use of transferred property and continue the perpetual legacy of land use controls and operation and maintenance expenditures. Moreover, too many of our DERP and BRAC program dollars are expended on overhead and administrative functions with too few dollars going to actual groundwater, surface water, or soil cleanup.

Therefore, I am directing you to refocus the Air Force's cleanup program from process and study to results; the following policies and goals will apply:

- 1) Cleanup objectives and efforts will focus on the broadest possible (fence-to-fence) accelerated site completion at an installation, as opposed to the previous focus of achieving "remedies-in-place" and individual site remediation. "Accelerated site completion" (ASC) is achieved at the point at which Air Force will make essentially no additional appreciable investments of time or money.¹
- 2) The primary contract mechanism to be used to achieve the ASC objectives will be Performance-Based Cleanup (PBC) agreements.

¹ That point is reached: a) For active sites -- when response action has resulted in allowing unrestricted use and unlimited exposure, if cost effective from a life cycle cost standpoint, and no further response action is necessary other than to document the closure; and b) For properties where AF will transfer a significant real property interest outside of the federal government -- when Air Force demonstrates it has minimized its long-term cleanup responsibilities and associated costs to the greatest degree feasible (for example, by cleaning up to unrestricted use and unlimited exposure standards; or transferring cleanup responsibilities together with the real property interest; or negotiating a privatized cleanup).

- 3) For remedy selection decisions, program managers will perform a cost/benefit analysis of the total life cycle costs of alternative cleanup objectives with overall ASC as the expected end point (e.g., sites such as landfills). Such analyses will be made an integral part of AF "requests for proposals." A remedial action objective other than ASC must be justified.
- 4) The Remedial Optimization Program should focus on the most efficient and effective means of achieving ASC at the broadest range of sites across an installation instead of optimizing remedy efficiency (e.g., reducing samples, wells, and energy use) and reducing O&M costs of remedies-in-place at individual sites. For transferred properties, the program should also consider Air Force versus third-party responsibilities and costs, to minimize Air Force risk and expenditure of resources.
- 5) Performance objectives in contracts must comply with existing agreements and regulations and protect or maintain protection of human health and the environment while encouraging innovation to achieve accelerated site completion.

The following objectives and targets will be applied to meet these goals:

BRAC

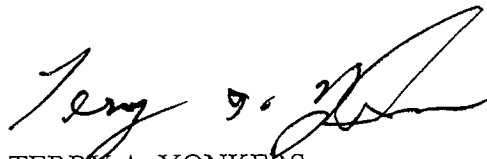
1. Accelerated completion of 75% of all sites by the end of 2012; 90% by the end of 2015
2. For sites not yet completed, ensure 75% are under a PBC contract by the end of FY11; 95% by the end of 2014

Non-BRAC

1. Accelerate completion of 50% of all sites by the end of FY12; 75% by the end of 2015
2. For sites not yet completed, ensure 60% are under a PBC contract by the end of FY12; 90% by the end of 2015

In addition, I am establishing an objective to reduce management and overhead cost to no more than 10 percent of total program cost as soon as practicable. I am directing a program-wide assessment by March 31, 2011 to demonstrate how we can achieve this last objective while meeting our regulatory responsibilities and the other goals, objectives and targets above.

This policy memorandum supersedes the interim policy memorandum (same title) dated December 23, 2010 and is effective immediately.



TERRY A. YONKERS
Assistant Secretary
(Installations, Environment, and Logistics)

cc:

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