



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

November 4, 1999

Rear Admiral Veronica Froman
Commander, Navy Region Southwest
DOD Regional Environmental Coordinator
937 North Harbor Drive
San Diego, CA 92132-5100

Re: RCRA Corrective Action GPRA Goals for Facilities on the RCRA Cleanup Baseline

Dear Admiral Froman:

I am writing to solicit your help in achieving one of EPA's top priorities for the coming years - meeting congressionally mandated cleanup requirements at DOD facilities. As you know, the Resource Conservation and Recovery Act (RCRA) includes corrective action requirements to cleanup releases of hazardous waste and hazardous constituents at all facilities regulated by RCRA. Under the Government Performance and Results Act (GPRA) of 1993, EPA must ensure that all facilities on the RCRA Cleanup Baseline meet aggressive cleanup goals by 2005. As a result, EPA Region 9 is working closely with our state counterparts to accelerate cleanup progress at each of these Baseline facilities. A significant number of these Baseline facilities in Region 9 are DOD properties (see Attachment 1).

Meeting the GPRA cleanup goals will be a challenge for both privately owned facilities and federal facilities. However, it is a top priority for EPA, as expressed by EPA's Assistant Administrator for Solid Waste and Emergency Response (OSWER), Tim Fields. Recently, Mr. Fields announced a set of RCRA Cleanup Reforms (Attachment 2) intended to streamline the process of achieving GPRA goals and final cleanups at RCRA facilities. We cannot meet these goals without the full cooperation of DOD. I am asking for your leadership and attention to address this important priority.

Background

In 1993, Congress passed GPRA which emphasizes reporting the results of government programs in plain language. The goals, set by EPA under GPRA, are that by 2005, the states and EPA will verify and document that 95 percent of facilities on the RCRA Cleanup Baseline will have "current human exposures under control," and 70 percent of these facilities will have "migration of contaminated groundwater under control." These goals are measured on a site-wide or entire facility basis substantiated by conditions as they exist at the time of the determination. Additional background information on these goals can be found in Attachment 2, *RCRA Cleanup Reforms: Faster, Focused, More Flexible Cleanups*, dated July 1999.

USEPA headquarters has developed two "Documentation of Environmental Indicator Determination" forms which EPA regions and authorized states will complete to verify and document each facility's status with respect to achieving these goals. I have included copies of these Environmental Indicator documentation forms as Attachment 3. Our headquarters office is also developing a public web site which explains the RCRA Cleanup Reforms and may eventually contain some facility specific information on Environmental Indicator status.

In Region 9, there are 163 facilities on the RCRA Cleanup Baseline, including 35 federal facilities under the jurisdiction of DOD. Attachment 1 is a listing of the DOD facilities on the RCRA Cleanup Baseline and their current status with respect to the GPRA Environmental Indicators. Of the 35 DOD facilities on

the RCRA Cleanup Baseline, six currently have control measures in place to ensure people are not exposed to contaminants ("current human exposures under control"); and three facilities have contained the movement of contaminated groundwater ("migration of contaminated groundwater under control").

Please note, most of the Environmental Indicator determinations reported on Attachment 1 were made prior to the availability of the Environmental Indicator documentation forms. I have instructed my staff to complete the documentation forms for these facilities during the next California Analogous Review project. Since the Analogous Review project is the means by which EPA and state staff will complete these documentation forms, I have provided some additional background information in Attachment 4 for your information.

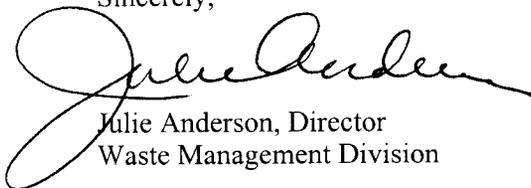
Current Situation

During previous Analogous Reviews, we have observed that certain DOD facilities do not appear on track to meet GPRA goals within the reporting time period. I need to point out that this observation was made by members of my staff during the course of the Analogous Reviews. It was not our objective to make these observations; hence this observation is admittedly subjective. Over the past few years, we have utilized the Analogous Review project to influence, where necessary, the remediation of sites whose remedial oversight is provided by a non-RCRA program. Our experience indicates that this is an effective approach.

The Analogous Review project will occur again for California facilities beginning in the spring of 2000. I have directed my staff to more carefully document conditions which support or refute the observation made during the previous review. I thought it would be best to inform you of this situation now while there is adequate lead-time for all facilities to meet these GPRA goals. I would greatly appreciate it if you could communicate these goals and emphasize their importance to staff at the facilities listed on Attachment 1. I am also interested in hearing from you regarding any DOD facilities that may have difficulty meeting these goals by 2005. We are required to begin formally reporting the results of these Environmental Indicator determinations to Congress beginning next year. We fully intend to leverage our private facilities to achieve these same goals within the required time frame and would find it awkward to explain to Congress why federal facilities are having difficulty meeting the same goals.

Thank you in advance for your attention to this important matter. If you would like to discuss this further, you can contact me at (415) 744-2138 or Larry Bowerman, Chief of our Office of RCRA Corrective Action at (415) 744-2051.

Sincerely,



Julie Anderson, Director
Waste Management Division

Attachments

- 1: Military Facilities on the RCRA Cleanup Baseline for Corrective Action
- 2: *RCRA Cleanup Reforms: Faster, Focused, More Flexible Cleanups*
- 3: Documentation of Environmental Indicator Determinations
- 4: Supplemental Information on the RCRA Corrective Action Analogous Review Project

cc: Ed Lowry, Director - California DTSC
Jean Calhoun, Director of Waste Programs - ADEQ
Allen Biaggi, Administrator - NDEP
Conchita Taitano, Division Administrator - Guam EPA
Bob Hall, Chief, Office of RCRA Corrective Action - USEPA HQs
Sara Segal, Office of Federal Facilities - EPA Region 9