NDIA Brief

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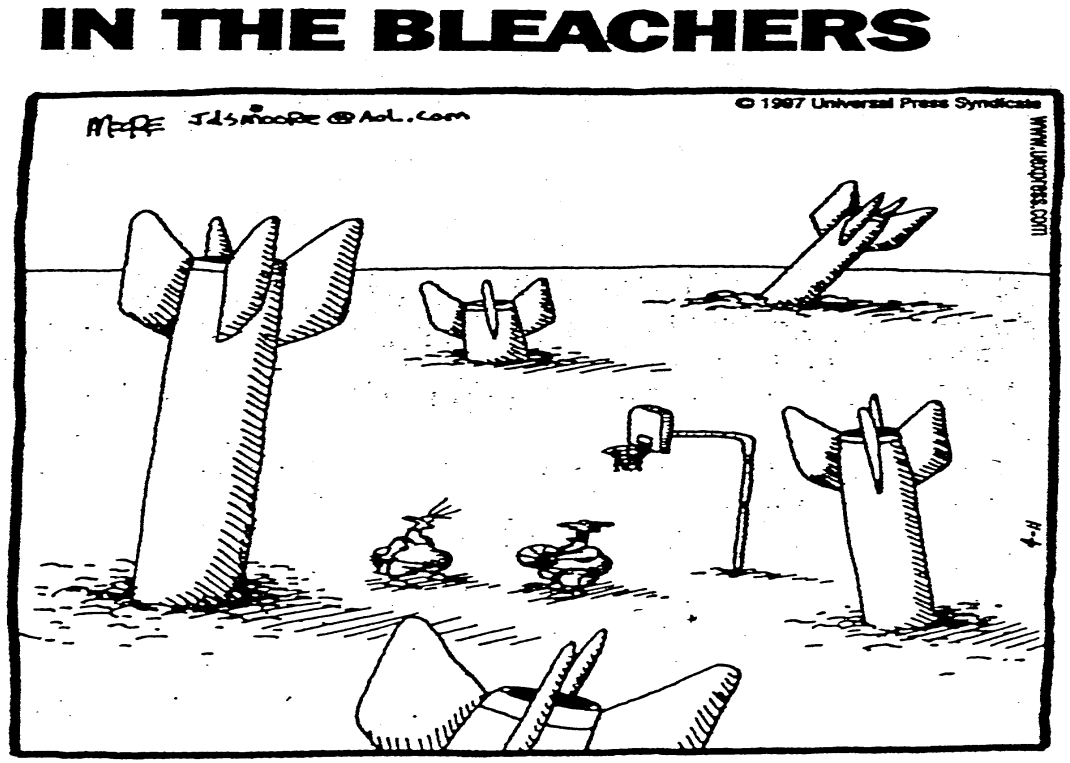
Outline

- **Discussion of the Issue**
- **Army Approach**
- **SMART Team**

Wh


IN THE BLEACHERS
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"Maybe we shouldn't play here."

Unexploded Ordnance

- **National Issue**
- **Huge Potential Liability (Billions of $)**
- **Complex Problem**
  - Regulators
  - Community
- **Risk cannot be quantified**
- **No National or State standard**
- **DDESB Standard not recognized**
- **Potential Impact on Army Readiness**

Army Process

- Follows Department of Defense Explosives Safety Board Standard
- Regulator/Land Owner/Community Involvement
- Clear to reasonably anticipated end use
- Site specific approach
- May involve post clearance measures
- Liability issue
- Principal concern is UXO/OE
- See www.hnd.usace for specific details on procedures

SMART Team

- Base Team appeared at Impasse on UXO Clearance Issues
- State/Region did not recognize DDESB Standard
- Land proposed for transfer prior to RI/FS ROD – state dictates criteria
- State had no realistic criteria other than find all UXO!
- Needed to senior level attention (Policy and Political Level)
- Very active and dissatisfied public (though minority opinion)
- Complex issues

Why is SMART Unique?

- **Conceived and implemented at very Senior level**
  - Principal Deputy Assistant Secretary of the Army (I&E)
  - Regional Administrator, EPA region IX
  - Director, California Department of Substance and Toxic Control
- **Solutions Oriented**
- **Not only Army Problem**
- **Public Trust**
- **Routine and Frequent Senior Level Participation**
- **Government Meetings in Public vice Public Meetings**
- **Army Facilitator given access to Agency Heads**

Operational Concept

- Focus on solutions
- Expose issues – policy, technology or other
- Bring in experts wherever found
- Build common understanding
- Level expertise through education
- Aggressively involve public
- Find something to solve every meeting
- Let the Base Team do their work

Operational Concept

- Build consensus opinions
- Not everyone gets their way
- Do not consider national implications
- Do not factor in cost
- Keep Agency heads informed as issues/solutions develop
- Not a Restoration Advisory Board (RAB)
- Keep control

Outcome

- **Mixed results**
- **More positives than negatives**
- **Failures not attributable to effort but bureaucratic inertia**
- **Major issues exist with unexploded ordnance**
  - "How clean is clean"
  - "What is acceptable risk"
  - "How can regulators add value"
  - "Why is there no cleanup standard"
- **Initiated new SMART at Savanna Army Depot (SVDA)**
- **Better chance of success --- earlier intervention**

SMART INITIATIVE

Issues:

- How clean is clean enough?
- What is acceptable Risk?
- How manage risk?
- How ensure maintenance of long-term LUCs

Policy Actions/Initiatives:

- Early involvement of regulators/the public
- CSMs/DQOs for OE/HTRW/CWM
- Site specific characterization/analysis/prioritization
- Early removal actions for HTRW/OE
- Early transfers/prior to cleanup
- Trusts to manage long-term LUCs
- Net Ecological Benefit Analysis (NEBA)
- USFWS National Wildlife refuge/MOA
- Regional offsets for ESA/wetlands remediation/mitigation
- Third-party property transfer