



# Compliance-Related Cleanup

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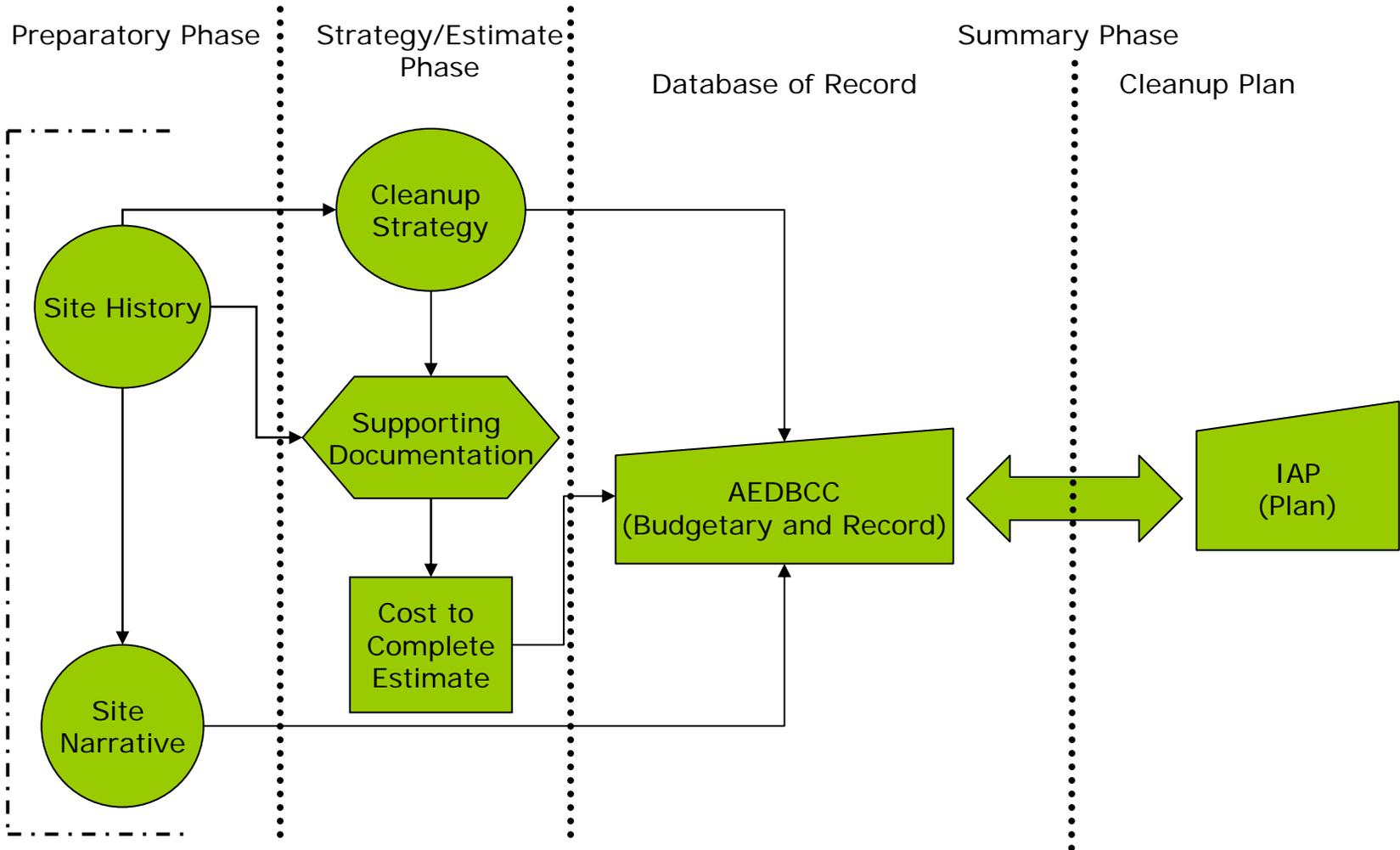
**Putting It All Together : IAPs, AEDBCC  
and Supporting Documentation**



# Documenting Strategy and Costs

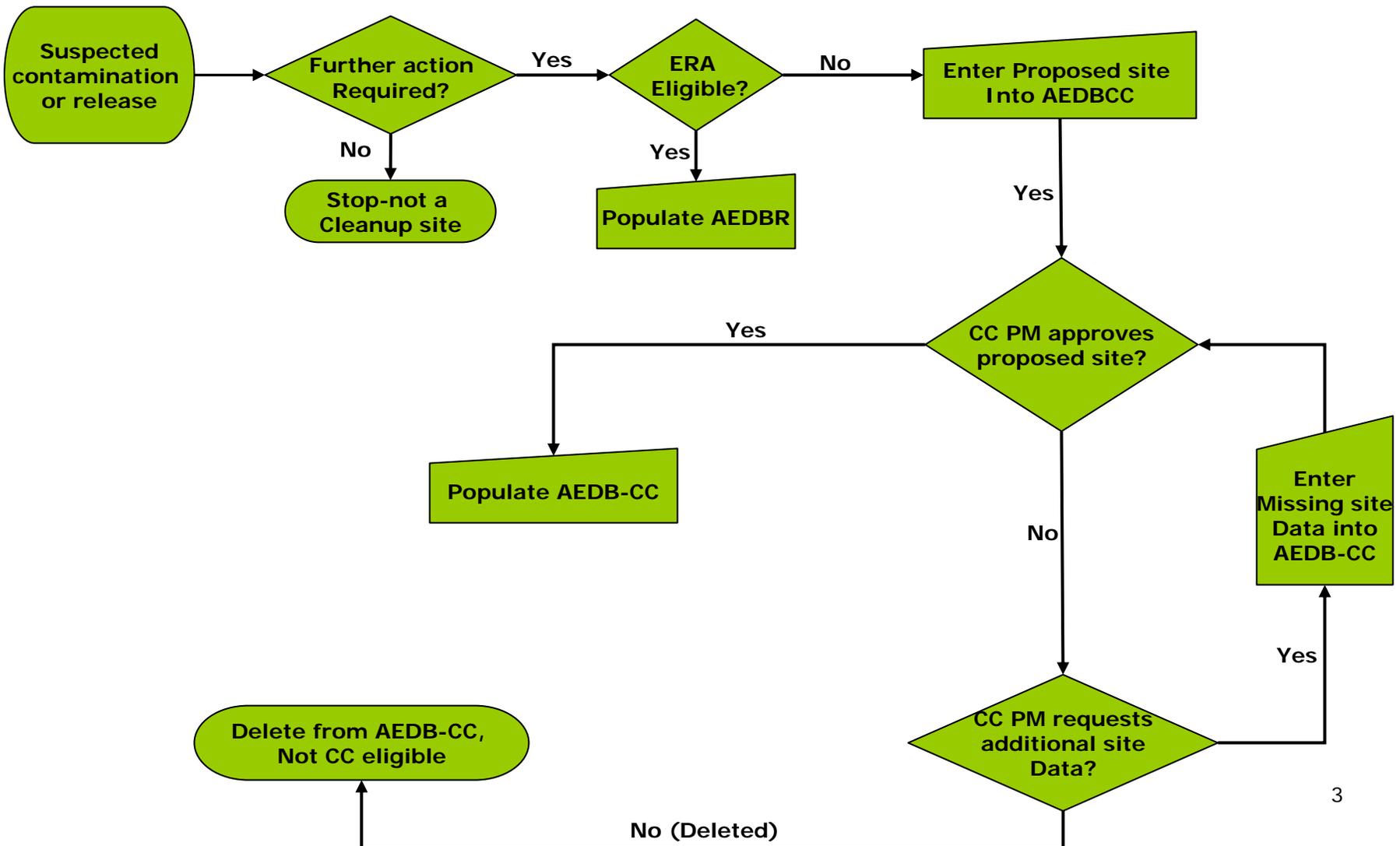


Proposed Site and Eligibility





# Preparatory Phase: Eligibility





# Preparatory Phase: Eligibility



- ❑ CC sites become eligible after initial response and must have proof of release (Post 17 Oct 1986 for federally-owned sites)
  - Sample analysis results above a regulatory limit
  - Documented proof of a release – spill reports, an EPAS finding, documented proof of past practices which caused a release, etc.
  - Visual documentation – photos of stains and an MFR explaining the assumed type of contamination.
  - Documented interviews with past employees or Army personnel.



## Preparatory Phase: Entering a Proposed Site in AEDBCC



- ❑ Create a proposed site in the database
  - Site ID
    - ❑ IMA (CCXXXXXXXX)
    - ❑ ARNG (CCSTXXXXXXXX)
  - Narrative
  - Historic Site Narrative
- ❑ Submit to CC PM for approval
  - CC PM checks site eligibility for CC program



## Preparatory Phase: Entering a Proposed Site in AEDBCC



- ❑ Minimum Narrative Requirements
  - Site Conditions
  - Type and level of contamination
  - Reason for action (regulatory driver)
  - Key documents
  - Potential for offsite migration
  - Proposed Actions (Cleanup Strategy)
  
- ❑ Historic Site Narrative Requirements
  - When contamination discovered
  - Past uses/operations and occupants
  - Environmental history, investigations, cleanup actions, etc.



# Strategy and Estimate Phase



## □ Financial Information

- After approval of proposed site - Enter funding information into AEDB-CC
- There are two main points that need to be addressed when developing the Cost to Complete Estimate:
  - Estimate Source
  - Supporting Documentation



# Strategy and Estimate Phase



## □ Estimate Source

- Estimate Source is dependent upon the current phase of the site.
- Prior to Feasibility Study (FS) or decision document
  - RACER
  - Other – RACER and/or a contractor proposal/contract
- After FS
  - Use estimate given in FS/DD as the source (check AEDB-CC)
  - Contractor proposal
  - Existing Contract
  - Actual Costs for Operations



# Strategy and Estimate Phase



- Estimate Source Cont.
  - **After two years of operations/LTM**
    - Actual costs – Invoices, cost proposal.
  - **Using historical costs from similar sites**
    - Must document in the MFR how the sites are similar.
    - Not used often – Auditors don't understand environmental – must explain well
    - Easier for monitoring



# Strategy and Estimate Phase



## ❑ Supporting Documentation

- All CTC estimates must be supported with documentation.
- Documentation will vary depending upon the estimate source.
- All CTC estimates must **also** include a summary document/memorandum for record (MFR) that clearly explains and identifies all assumptions and costs.



# Strategy and Estimate Phase



## □ Supporting Documentation

### ■ RACER

- Import .csv file
- Upload .mdb file
- Provide a MFR to summarize assumptions.

### ■ Existing contract

- Upload applicable pages of the contract (Current FY costs)
- Provide a MFR to summarize assumptions.



# Strategy and Estimate Phase



## □ Supporting Documentation

### ■ RACER and Contract/Proposal

- Upload .mdb file
- Upload applicable pages of contract/proposal
- Provide a MFR to summarize assumptions.

**\*Values in the Required Funding Spread and values in the existing contract/proposal must match. If the cost estimate values do not match, the discrepancies must be clearly explained in the MFR.**



# Strategy and Estimate Phase



## □ Memorandum For Record (MFR)

### ■ What is it?

- A summary document which identifies the assumptions, any supporting documentation, and the information from it, used as the basis for the CTC estimate.

- Signed and dated by the estimator and a reviewer (**two signatures**)
- Updated at least annually



# Strategy and Estimate Phase



## □ MFR Requirements

- Background information (Should be same as historical Narrative)
- Cleanup strategy
- Assumptions
- Calculation Summary
- Quantities
- Cost per Unit
- Other Cost Elements (Utilities, etc.)
- Project Changes
- Cost Adjustments



# Strategy and Estimate Phase



- MFR Requirement Details
  - Background information
    - Must contain data/facts needed to identify the conditions surrounding the project.
  - Cleanup Strategy
    - Clearly explain the assumed approach to reach RIP/RC based on current information.
  - Assumptions
    - Items that were unknown at the time of estimate development, but that the installation needed to complete the estimate.



# Strategy and Estimate Phase



## □ MFR Requirements Details

### ■ Calculations

- If using a contract or proposal that covers multiple sites or that has multiple alternatives for cleaning the site; must specify which alternative and which costs were used and why. Show calculations.
- If historic costs were used, show calculations used to escalate costs to current year dollars.

### ■ Quantities

- Samples (Ex: Four years of quarterly sampling for 10 wells equals the total 160 samples required.)
- Excavation volume (Ex: Based upon knowledge of the site, it is assumed that 139CY of soil will be excavated from an area 10ftX15ftX25ft.)



# Summary Phase: AEDBCC



## □ AEDB-CC

- Spring Data call actions (information from IAP can be used):
  - Site information;
  - Update Cost to Complete estimate(current fiscal year dollars);
  - Convert RACER estimate to current year version of RACER
  - Obligated, Programmed and Required funding;
  - Program management costs;
  - Phase Schedule (only if changes are required);
  - Enter new sites.
  - Update all changes in MFR



# Summary Phase: AEDBCC



- ❑ AEDBCC (cont.)
  - Fall Data call actions:
    - ❑ Enter new sites
    - ❑ Update applicable sections of AEDB-CC, if any significant project changes occurred since the spring datacall
    - ❑ Update funding information. (Required, Programmed, Obligated)
    - ❑ Review and submit if no changes.
      - Even if no changes are made to CTC estimate, installations must submit project to next level



# Summary Phase: AEDBCC



- ❑ Supervisory Review Checklist (This is the installations qualification of data in AEDBCC)
  - One required for each installation
    - ❑ List all sites at that installation
  - Upload at installation level
  - One signature with title and date
    - ❑ A single person or panel can conduct supervisory review of the estimates.
    - ❑ The person who developed the estimate cannot sign the Supervisory Review Checklist.
      - NGB – Chief of Staff or his designee
      - IMA – Must be government employee (Installation PM or employee supervisor)
  - Must be legible and downloadable



# Summary Phase



## □ QA/QC Requirements

- Installations must perform their own QA/QC prior to finalizing AEDBCC data. (Use attached spreadsheet in Appendix 2 to QC AEDBCC.)
- IMA Regions/HQIMA/NGB/USAEC will perform concurrent review to QA/QC data.
- USAEC performs QA/QC of financial data.



# Summary Phase: AEDBCC



## □ Program Management Costs (10% of overall program)

Salaries and benefits (FTE and dollars)	Costs for government employees to manage the CC program at the installation level. The FTE is entered into the database of record as a fraction of or whole man-year (e.g., 0.25 for one quarter of an FTE).
Training (dollars)	Costs for professional development related to the CC program.
Travel (dollars)	Travel to attend meetings and training associated with the CC program
Document review and associated fees (dollars)	Fees charged by regulators for review of site-specific documents as required
Contract Support (this NOT for site project execution) (dollars)	Costs for contract support to manage the CC program at the installation level
Administrative/record keeping (dollars)	Includes installation administrative and record keeping costs
Other (dollars)	Covers other costs (e.g., IT support, security for excess properties if required)



# Summary Phase: Installation Action Plans



## □ Installation Action Plans (IAP)

### ■ Workshops

- Review and update old IAP doc before workshop (This information can be used to update your Spring AEDBCC Datacall)
- Internet access must be available to update AEDBCC at workshop

- New system: Will be printed from the CC IAP database. IAP database will be populated with data from AEDB-CC.



# Summary Phase: Installation Action Plans



## □ IAP actions

- CTC information
- Update narratives
- Phase Completion Dates
- Cleanup Strategy (if needed)
- IAP Signatures
  - NGB
    - The Adjutant General (TAG) or designee
    - NGB Chief of Environmental Programs Division
  - IMA
    - Garrison Commander
    - Installation Environmental Chief
    - Regional Environmental Chief



# Compliance-Related Cleanup



## References

- ❑ Compliance-Related Cleanup Program Guidance
- ❑ Cost-To-Complete Guidance
- ❑ Installation Action Plan Guidance
- ❑ Guidance for Recognizing, Measuring, and Reporting Environmental Liabilities Not Eligible for Defense Environmental Restoration Funding



# Appendix 1



## □ Supporting Documentation

### ■ RACER

- upload .mdb file
- Import .csv file
  - Common errors
    - RACER technology values must be >1k
    - RACER phase names must match AEDB-CC phase names
- RACER training certificate for estimator is required in installation estimate file
- Each year RACER estimate must be converted into the new version of RACER. This spring all estimates must be converted to the 2006 version
- Two options for required MFR
  - Print RACER Summary Report as MFR (make sure that all information in RACER report meets MFR min requirements) or
  - MFR summarizing and explaining assumptions



# Appendix 2: QC Checklist



## 1. General Information - Does the Site/Historic narratives contain the following?

- a. Site Conditions (e.g. soil, groundwater)
- b. Type contamination
- c. Current contaminant levels
- d. Correct Law, reg, order, statute, or driver mandating cleanup
- e. Proposed Cleanup strategy
- f. Key documents supporting the strategy
- g. Past uses, types of activities (processes), and occupants
- h. Environmental history (e.g. investigations, known releases, sampling, cleanup actions, closures.)

## 2. Remedial Actions

- a. Do the remedial actions make sense?
- b. Do the remedial actions address what was discussed in the narrative?
- c. Are they consistent with the phase schedules?

## 3. Phase Schedule

- a. Is it reasonable and achievable (studies relative to the actions)?
- b. Is it consistent with the funding spread and remedial actions (i.e., dates correct)?
- c. Is it consistent with the cleanup strategy in the narrative?



# Appendix 2: QC Checklist



## 4. Cost Estimate & Requirements

a. Has correct Estimate Source been identified?

b. Is an Estimate Source narrative provided?

c. Have material changes (cost change +/- 10%) been adequately explained? (if applicable)

d. Have zero cost estimates been explained? (if applicable)

e. (Spring only) Is the information in the database consistent with the information in the IAP and CTC spreadsheet?

h. Has an adequate CTC source document been uploaded ?

f. Is it complete and legible and does it support the estimate?

g. If RACER was used, was the .mdb file uploaded correctly?

h. Were obligations entered?



# Appendix 2: QC Checklist



## 5. Memorandum for Record (MFR)

a. Does the MFR support the estimate and explain assumptions?

b. Does the MFR have two signatures?

c. Does the MFR contain and explain the following:

1. background information

2. disposal/cleanup strategy

3. calculation summary (clearly explains any calculations done to complete estimate)

4. quantities (e.g.cubic yards)

5. cost per unit (major cost elements - Not required for RACER estimates)

6. other cost elements (utilities, etc.)

7. major project changes (if applicable)

8. cost adjustments (if applicable)



# Appendix 2: QC Checklist



## 6. Supervisory Review Checklist

a. Is a supervisory review checklist attached, legible, signed, and dated?

b. Are the correct sites and Site IDs listed?

## 7. Program Management Costs

a. Have the Program Management Costs been entered?

b. Do they look reasonable (i.e., 8-10% of annual costs)?