



COMPLIANCE CLEANUP ISSUES

1 February 2006

Our Mission: Manage Army installations to support readiness and mission execution – provide equitable services and facilities, optimize resources, sustain the environment and enhance the well-being of the Military community

Leading Change for Installation Excellence



COMPLIANCE CLEANUP PROGRAM



ISSUES

- Installation Action Plans
- Funding
- Obligations
- Program Management Costs
- Site Completion
- Quality Control Review
- Summary



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INSTALLATION ACTION PLANS



- Installation Management Tool
 - Updated annually
- Action Plan must be reflected in AEDB-CC
 - Phase schedule
 - Corrective Actions
 - Funding
- If IAP differs from AEDB-CC, state reason in calculation summary of the cost estimate MFR



COMPLIANCE CLEANUP PROGRAM



FUNDING

- Compliance Cleanup is an integral part of the Compliance Program (VENC) ***No separate funding***
- Current Year Funding Levels Where Established by the Fall 2003 Validated Environmental Program Requirements (EPR) minus HQDA taxes and decrements
- Requirements in AEDB-CC more “real-time”
 - FY06 requirements submitted and approved in CC: \$53.7M
 - ***Increased by \$9.5M since Fall 2003 EPR submission***
 - FY07 requirements submitted and approved in CC: \$63.4M
 - ***Increased by \$28.8M since Fall 2003 EPR submission***
- This is first time the AEDB-CC used to build POM (Program Objective Memorandum) requirements FY08-13
 - Requirements must be flattened to a more realistic annual level
 - Adding requirements in the execution/budget years only hurts future funding levels
 - Decentralized database: Installations need to put high priority sites first and push out lower priority sites into the POM years to more closely match reality



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OBLIGATIONS

- Record expenditures under Obligated Funding Spread
- Use DFAS AMS Compliance Cleanup codes
 - .A0 – Compliance-related Cleanup
 - .A1 – Cleanup in the US and Territories
 - .A2 – Overseas Remediation
 - .A3 – Operational Range Response Actions
- Recording expenditures is a part of environmental liability reporting
 - Actual expenditures balanced against stated cost to complete estimates



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PROGRAM MANAGEMENT

- Requirements for the Installation Staff to manage the Compliance Cleanup Program
- Program management funding target level is 8-10%
 - IMA overall CC program mgmt requirements at 12%
 - Installations above 10% should reduce to within target
 - Requirements vary from year to year, need stability
- Program management funding requirements must be related to the actual level of effort
 - Demonstrate a commitment to support the installation staff



COMPLIANCE CLEANUP PROGRAM



REQUIREMENTS: PROGRAM MANAGEMENT PERCENTAGES OF TOTAL SITE COSTS

REGION	FY06	FY07	FY08	FY09	FY10	FY11	FY12
SERO	8%	7%	8%	17%	19%	23%	27%
NERO	11%	13%	38%	38%	45%	55%	78%
SWRO	9%	14%	5%	10%	43%	44%	51%
NWRO	9%	5%	10%	26%	23%	24%	28%
PARO	11%	7%	6%	3%	4%	33%	48%
EURO	14%	8%	8%	16%	23%	24%	24%
KORO	0%	0%	0%	0%	0%	0%	0%

Due to drop off of requirements

Fall 2005 Locked Data Set



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SITE COMPLETION

- Site closeout considered “Complete” only when NFA determination is documented
 - Upload NFA determination at the site level on the General Information screen
 - Keep site close out status as “Future” with a zero cost estimate requirement until NFA is documented
- DO NOT discontinue closed sites
 - Site Status remains “Approved”
 - Record site close out status as “Completed”



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COMPLIANCE CLEANUP CTC AUDIT RESPONSIBILITIES

ACTIONS	RESPONSIBILITY
Develop CTC Estimates	Installation CC - RPM
Supervisory Review	Installation Environmental Chief
Quality Control	IMA Region Representative
Quality Assurance	USAEC Cleanup PM Branch
Approval	IMA HQ Representative
Validation	ACSIM Director Environmental. Program



Quality Control Review

- QC review is an IMA Region responsibility
- QC review includes:
 - General Information – Site/Historic narratives
 - Remedial Actions
 - Phase Schedule
 - Cost Estimate & Requirements (estimate and documentation)
 - Memorandum for Record (MFR)
 - Supervisory Review Checklist
 - Program Management Costs
- Installations must address QC comments when updating site information in AEDB-CC



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SUMMARY

- Action Plan is the Installation's cleanup guide
- AEDB-CC data base is the data base of record for the compliance cleanup program
 - Records environmental liabilities
 - Used plan, program, and track obligations
 - Used for tracking performance towards the IMA goals
- Program management funding requirements must be related to the actual level of effort
- Quality Control reviews site and program management information
 - Installations need to review and address comments



COMPLIANCE CLEANUP PROGRAM



END OF BRIEF



INSTALLATION MANAGEMENT AGENCY



“Sustain, Support and Defend”