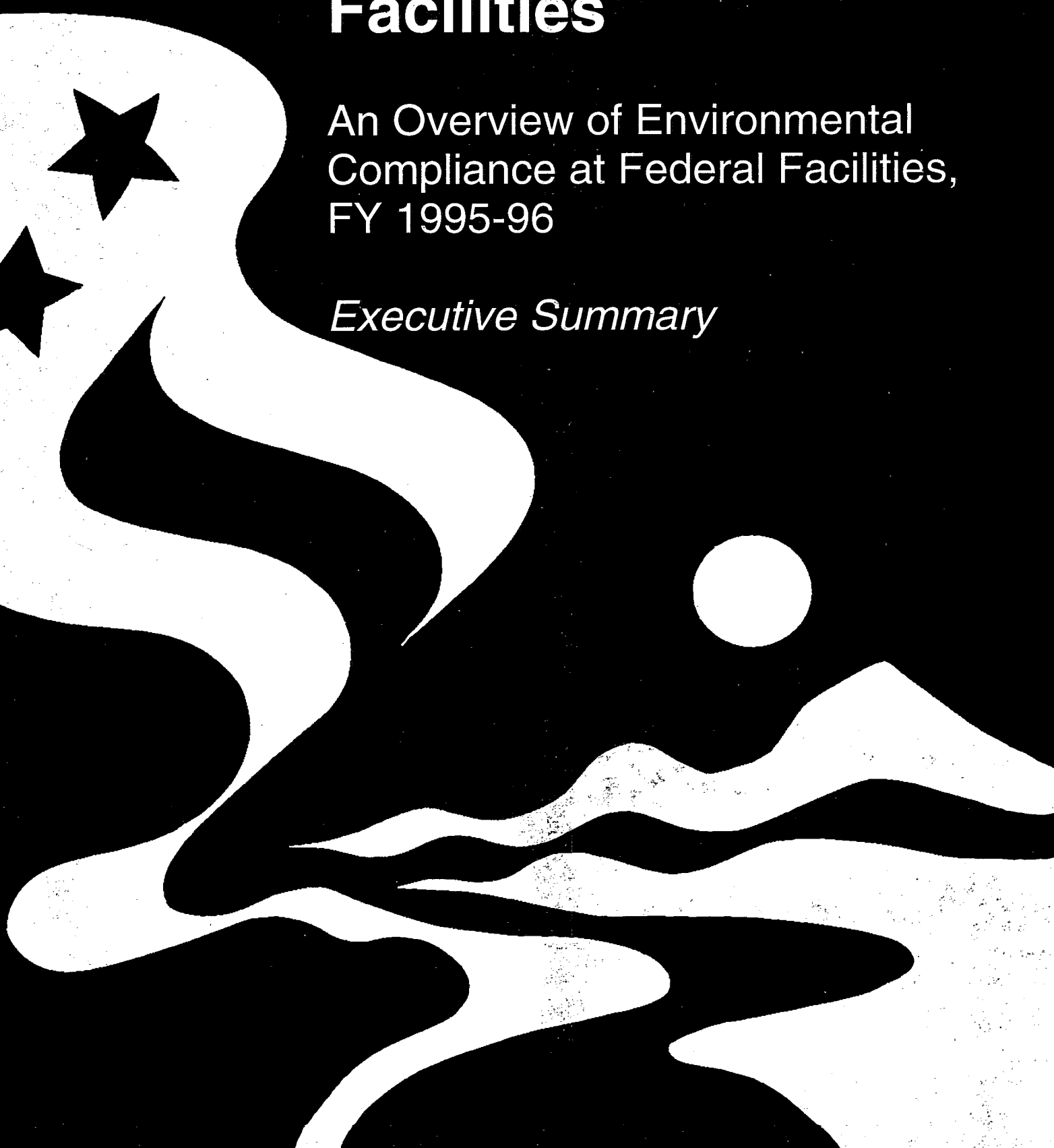


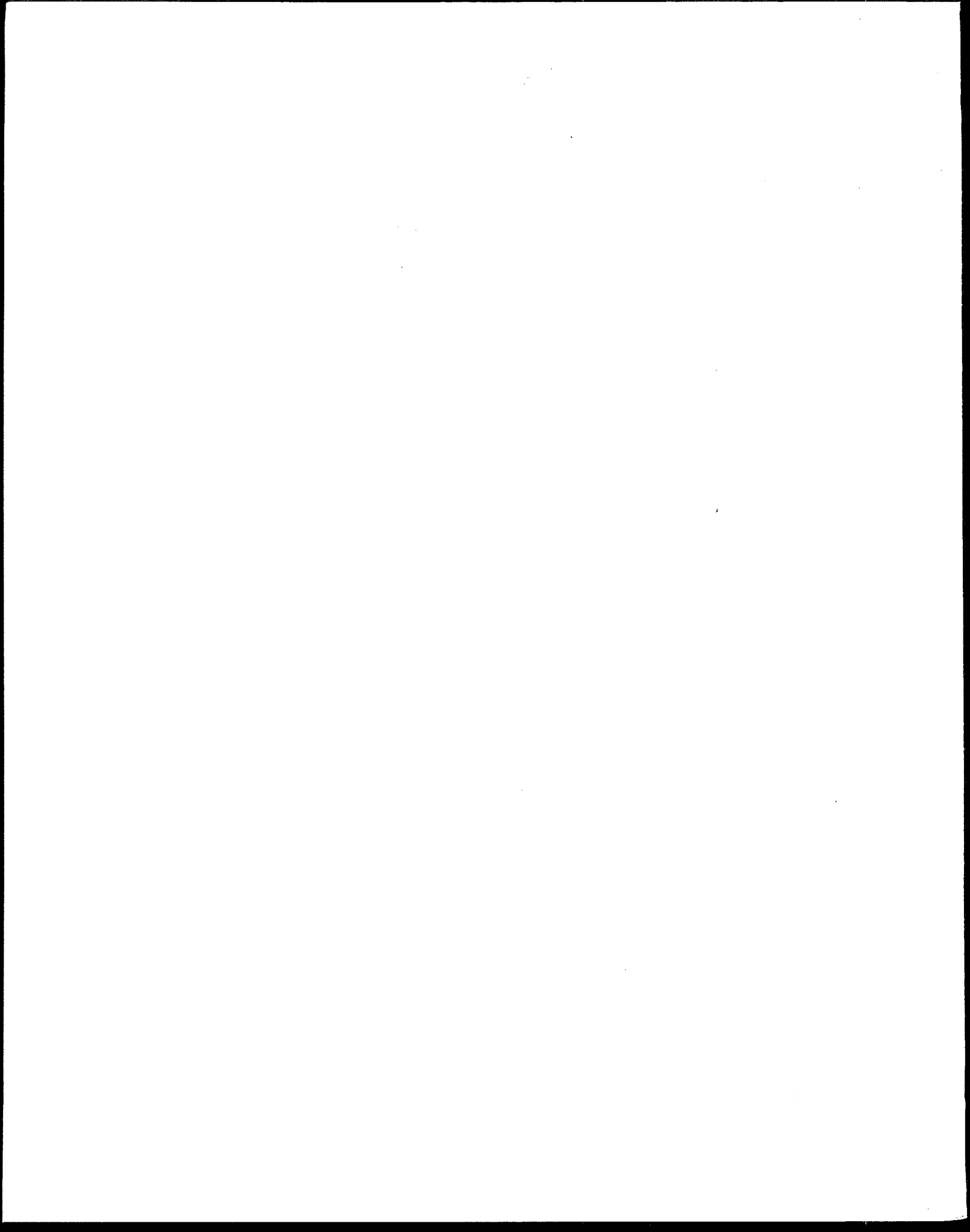


The State of Federal Facilities

An Overview of Environmental
Compliance at Federal Facilities,
FY 1995-96

Executive Summary





EXECUTIVE SUMMARY

EPA's Federal Facilities Enforcement Office (FFEO) within the Office of Enforcement and Compliance Assurance prepared this third *State of Federal Facilities Report* to provide a snapshot of environmental compliance and enforcement data regarding federal facilities. The report also helps FFEO and the regulated community assess compliance assistance strategies.

Environmental Requirements

Environmental requirements potentially affecting federal facilities range from federal statutes and their implementing regulations to state and local laws and ordinances. This report summarizes federal facility data during FY 1995 and FY 1996 with respect to the following nine major environmental statutes and programs:

- Resource Conservation and Recovery Act (RCRA) -- Subtitle C
- Clean Water Act (CWA) -- National Pollutant Discharge Elimination System (NPDES) program
- Clean Air Act (CAA)
- Safe Drinking Water Act (SDWA) -- Public Water System Supervision (PWSS) program
- Toxic Substances Control Act (TSCA)
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)
- Emergency Planning and Community Right-to-Know Act (EPCRA) -- Toxics Release Inventory (TRI)
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- Base Realignment and Closure (BRAC)

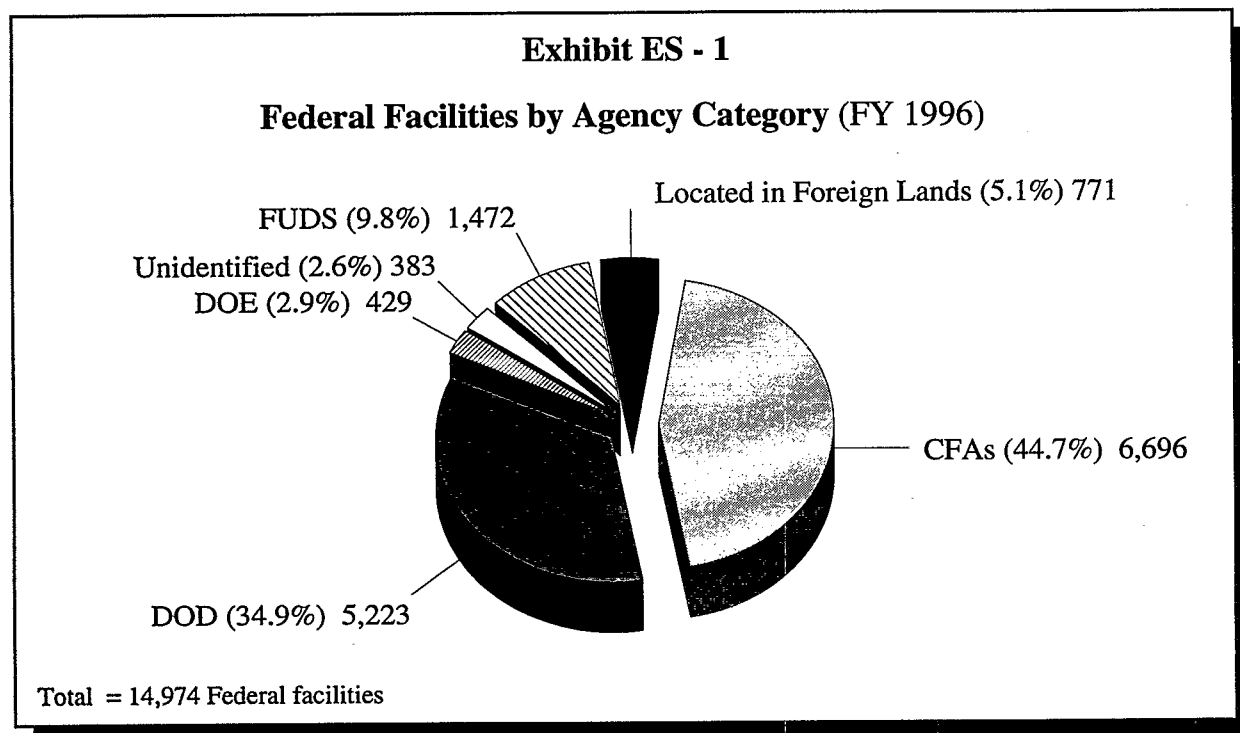
Before discussing specific environmental programs, it is necessary to provide some background information on the universe of federal facilities.

Overview of Federal Facilities

Federal facilities typically comprise a fairly small portion (i.e., less than five percent) of the universe of private and public facilities regulated under the environmental statutes and

programs covered by this report. However, the nature of environmental issues federal facilities face is different than the private sector and highlights the importance of promoting environmental awareness and leadership at federal facilities.

According to the Integrated Database for Enforcement Analysis, as of FY 1996 there were approximately 15,000 federal facilities engaged in some type of activity regulated by environmental requirements. These facilities can be grouped into six broad categories -- Department of Defense (DOD), Department of Energy (DOE), Civilian Federal Agencies (CFA), Formerly Used Defense Sites (FUDS), federal facilities located in foreign lands, and unidentified federal facilities. A breakdown of federal facilities by agency category is presented in Exhibit ES - 1.



DOD and DOE facilities typically include military bases, manufacturing plants, and laboratory facilities. The universe of CFA facilities is more diverse and reflects the range of activities conducted by these agencies. Examples of CFA facilities include: Coast Guard installations, USDA agricultural research stations, DOJ penitentiaries, EPA environmental laboratories, electric power generation stations, and various storage facilities.

Measuring Environmental Compliance: Compliance Indicators

Because of differences in how EPA and states define and assess compliance under different environmental programs, *it is not feasible to develop a single compliance indicator that yields meaningful comparisons across programs*. However, evaluating selected

compliance indicators over time can reveal how federal facilities are performing with respect to individual programs. Exhibit ES - 2 presents compliance indicators that measure the level of relatively serious noncompliance at major federal facilities. The definitions of the indicators are summarized below:

Statute	Compliance Indicator
RCRA	Percent of inspected federal treatment, storage, and disposal facilities (TSDFs) <u>not</u> cited for Class I violations
CWA	Percent of major federal facilities <u>not</u> in significant noncompliance (SNC)
SDWA	Percent of federal systems <u>not</u> in SNC
CAA	Percent of major federal sources in compliance
TSCA	Percent of inspected federal facilities <u>not</u> in SNC

These compliance indicators have been measured since FY 1991. Exhibit ES - 2 presents actual values for the compliance indicators discussed above. From FY 1991 to FY 1996, RCRA compliance increased, CWA compliance increased and then steadily decreased, SDWA compliance fluctuated but remained high, CAA compliance decreased from the mid-90 percent range to the high 80 percent range, and TSCA compliance remained at a high level.

Exhibit ES - 2

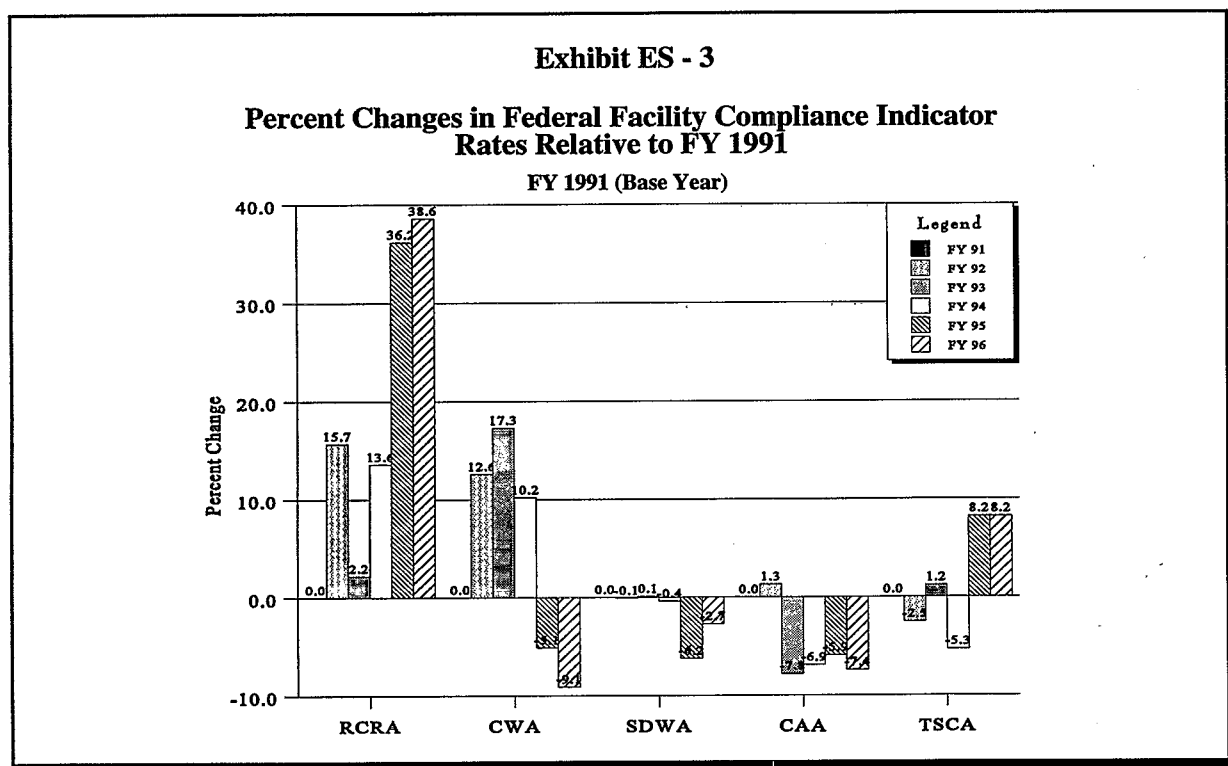
Federal Facility Compliance Rates for Selected Indicators

Statute	FY 1991	FY 1992	FY 1993	FY 1994	FY 1995	FY 1996
RCRA	54.2%	62.7%	55.4%	61.6%	73.8%	75.1%
CWA	80.3%	90.4%	94.2%	88.5%	76.2%	73.0%
CAA	94.4%	95.6%	87.0%	87.9%	88.8%	87.4%
SDWA	99.1%	99.0%	99.2%	98.7%	93.0%	96.4%
TSCA	92.4%	90.1%	93.5%	87.5%	100.0%	100.0%

To measure changes in compliance rates since FY 1991, standardized compliance indicators are derived by dividing the annual rate for each indicator listed above by the FY 1991 value. These standardized indicators measure changes in compliance rates for the various programs relative to FY 1991 in the same way the consumer price index measures

changes in the rate of inflation relative to a given base year. The purpose of standardization is to avoid potentially misleading comparisons of the absolute level of compliance, and instead focus on measuring changes in compliance over time.

As shown in Exhibit ES - 3, the level of federal facility compliance with most major environmental statutes/programs has been somewhat mixed since FY 1991. Under CWA,



SDWA, and CAA the level of compliance at federal facilities decreased by 9.1, 2.7, and 7.4 percent, respectively, during the FY 1991 to FY 1996 time period. In contrast, RCRA compliance at federal facilities increased by 38.6 percent, and TSCA compliance increased by 8.2 percent relative to FY 1991.

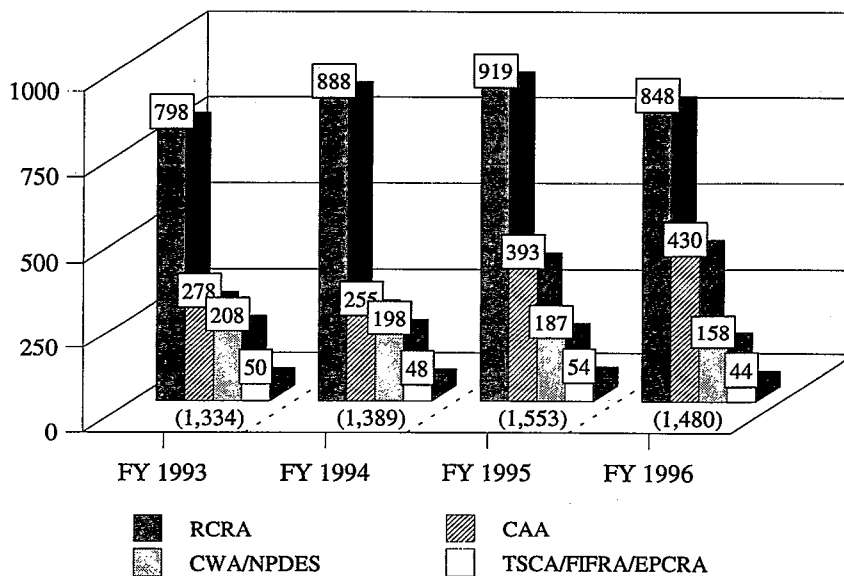
Inspections

Exhibit ES - 4 summarizes inspection activity at federal facilities from FY 1993 - FY 1996. Note that because the PWSS program under SDWA relies on self-reporting, there are no inspection data for this program. The total number of inspections at federal facilities conducted under all programs increased from 1,334 in FY 1993 to 1,480 in FY 1996. The level of inspection activity increased most dramatically under the CAA (54.6 percent), while RCRA inspections increased by a more modest 6.3 percent. In contrast, CWA/NPDES inspections

decreased by nearly one-fourth, and taken collectively, TSCA/FIFRA/EPCRA inspections declined by 12 percent.

It should be noted that these overall totals are not necessarily indicative of the level of resources expended on inspection activities within a given program because they do not distinguish between inspection types. For example, there are many different types of inspections under RCRA (e.g., Comprehensive Monitoring Evaluations, Compliance Evaluation Inspections, Record Reviews). Some of these are resource-intensive field inspections, while others are simply reviews of documents. For a more detailed discussion of inspection activity, see the statute/program-specific summaries contained in Section III of this document.

Exhibit ES - 4
Federal Facility Inspections (FY 93 - FY 96)

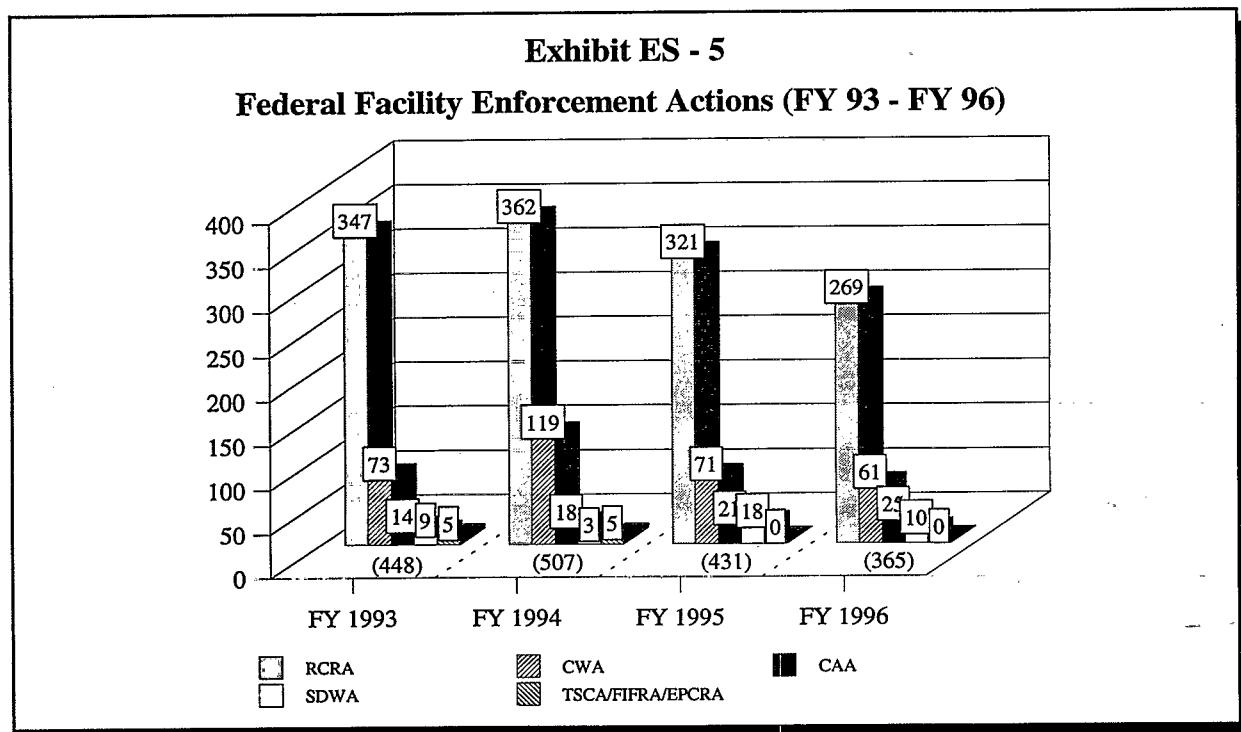


Enforcement

As shown in Exhibit ES - 5, the total number of enforcement actions taken against federal facilities decreased by more than 18 percent (448 to 365) from FY 1993 to FY 1996. The total number of RCRA enforcement actions taken against federal facilities decreased by 22.5 percent from FY 1993 to FY 1996. This substantial decrease occurred despite the overall increase in RCRA inspection activity (see Exhibit ES - 4 above). CWA/NPDES enforcement also declined by 16.4 percent, although as shown above, the decline in inspections was much more pronounced. Over the same period, CAA enforcement actions at federal facilities actually increased by nearly 80 percent, paralleling an increase of more than 50 percent in inspections. SDWA enforcement actions remained fairly constant during this time frame, while

TSCA/FIFRA/EPCRA enforcement actions dropped to zero in FY 1996, albeit from a fairly small number (i.e., 5) in FY 1993.

As was the case for inspections, these aggregate enforcement action totals do not account for differences in the type of enforcement action (i.e., a warning letter and an administrative order each count as one action). For a more detailed discussion of enforcement activity, see the program-specific summaries contained in Section III of this document.



The remainder of this Executive Summary presents summary data for federal facilities under the RCRA, CWA, CAA, EPCRA, SDWA, TSCA/FIFRA, CERCLA, and BRAC programs, while the full report contains more detailed compliance information.

Resource Conservation and Recovery Act

The 3,685 federal RCRA facilities represent a fairly small portion of the entire RCRA universe in FY 1996, approximately 1.2 percent. Of the 3,685 facilities, 42.2 percent are DOD, 5.2 percent are DOE, and 49.6 percent are CFA, and 3.0 percent are unidentified by agency. RCRA facilities can be further subdivided into four categories: small quantity generators (SQGs), large quantity generators (LQGs), transporters, and TSDFs. As can be seen in Exhibit ES - 6, the distribution of federal facilities by handler type differs from non-federal facilities in that:

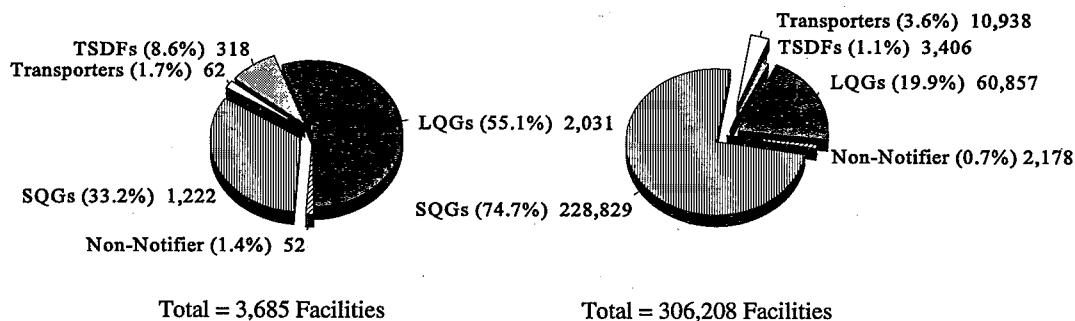
- The share of the universe comprised by TSDFs is eight times greater among federal facilities;
- Transporters are more than twice as common within the non-federal sector; and
- LQGs account for the majority (55.1 percent) of federal handlers, while SQGs account for the majority (74.7 percent) of non-federal facilities.

Exhibit ES - 6

RCRA Facility by Handler Type (FY 1996)

Federal Facilities

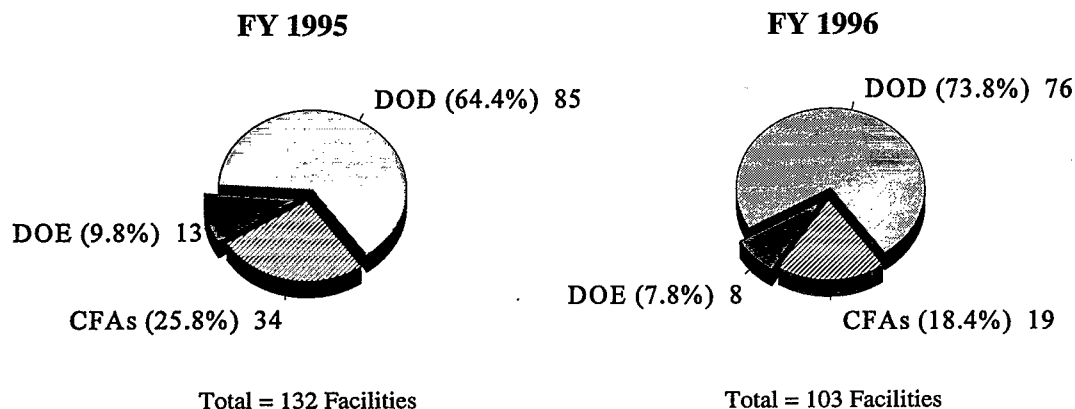
Non-Federal Facilities



To assess compliance with RCRA requirements, federal and state inspectors conducted 919 and 848 inspections at federal facilities in FY 1995 and FY 1996, respectively. Of these, 132 and 103 facilities, respectively, were cited for Class I RCRA violations. Exhibit ES - 7 presents the percentage of facilities receiving Class I violations according to agency.

Exhibit ES - 7

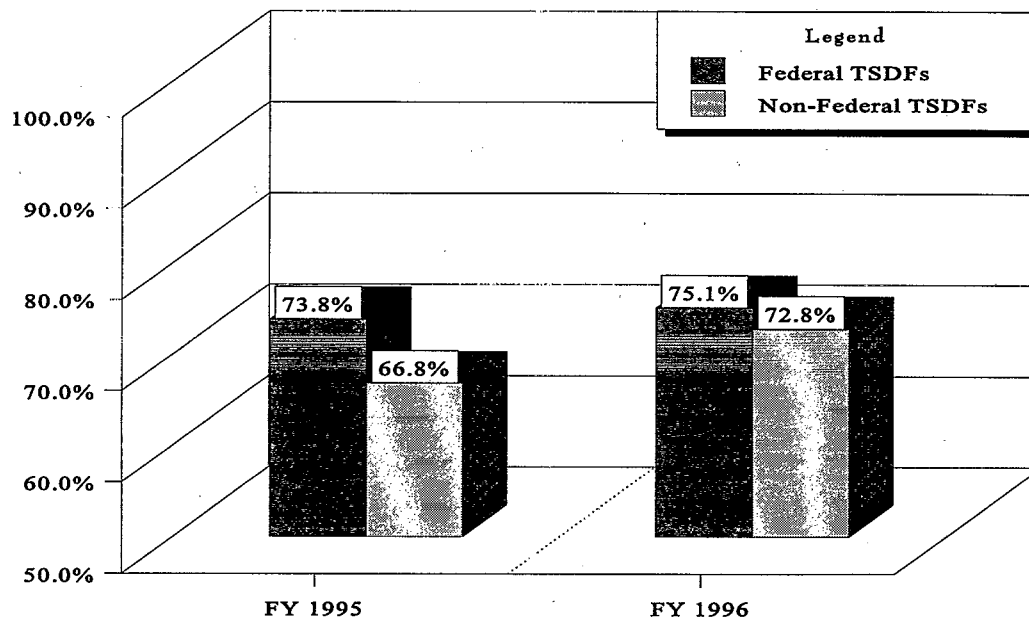
Federal Facilities with Class I Violations by Agency Category



Of the federal facilities cited for Class I violations in FY 1995 and FY 1996, 71 and 64, respectively were TSDFs, which are generally considered major federal facilities under RCRA. Therefore, of the total number of inspected federal TSDFs (271 in FY 1995 and 257 in FY 1996), 73.8 percent and 75.1 percent were not cited for Class I violations in FY 1995 and FY 1996, respectively. The corresponding Class I violation "compliance rates" for the non-federal universe of inspected TSDFs were 66.8 percent and 72.8 percent. Exhibit ES - 8 graphically presents this comparison.

Exhibit ES - 8

Percentage of Inspected TSDFs not Cited for RCRA Class I Violations



There were a total of 321 enforcement actions taken against federal facilities in FY 1995 and 269 taken in FY 1996. Exhibit ES - 9 presents a breakdown of informal versus formal enforcement actions, as well as proposed versus final penalties assessed and costs attributed to Supplemental Environmental Projects.

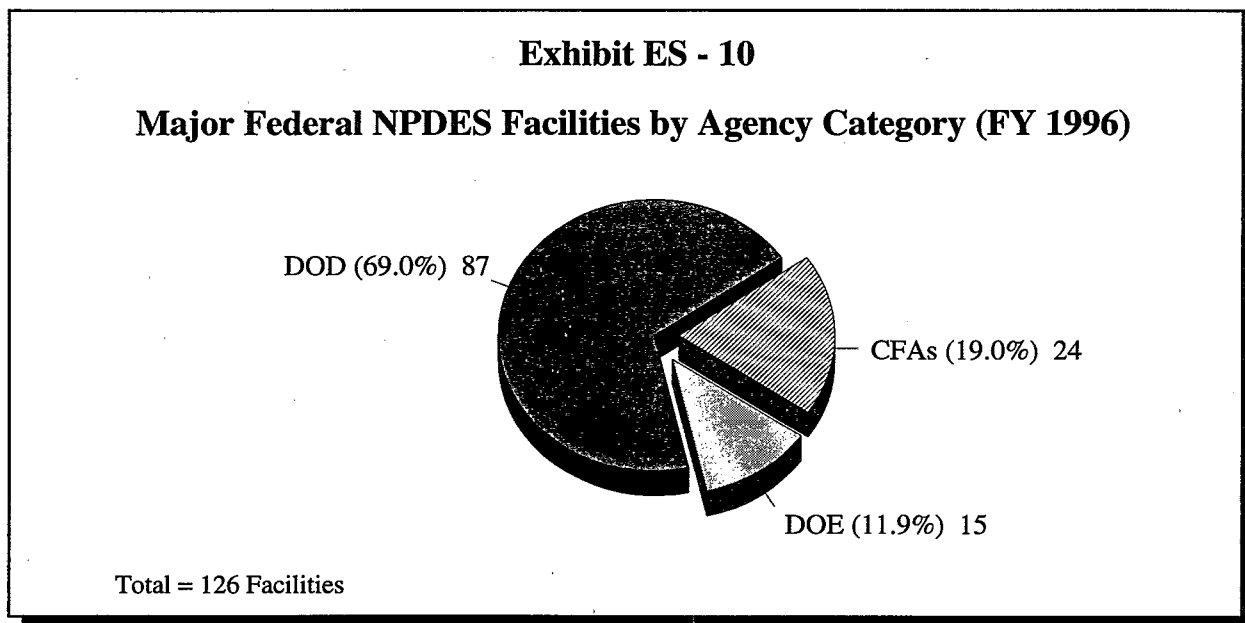
Exhibit ES - 9
RCRA Enforcement Actions at Federal Facilities

Type of Action	FY 1995 Total	FY 1996 Total
Informal	238 (74.1%)	207 (77.0%)
Formal	83 (25.9%)	62 (23.0%)
All Enforcement Actions	321	269
Proposed Penalties	\$ 1,536,776	\$1,726,423
Final SEP Cost	\$ 355,831	\$ 622,195
Final Penalties Collected (excluding SEP costs) (04/17/97)	\$ 1,601,213	\$ 794,631

Clean Water Act

The CWA and its 1987 amendments are the primary statutes governing the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. Dischargers of point source wastewater must submit an application for a NPDES permit.

At the end of FY 1996, federal facilities comprised approximately 1.9 percent (126) of the total universe of 6,630 major facilities regulated under the NPDES program. As shown in Exhibit ES - 10 of these 126 facilities, 69.0 percent were DOD, 11.9 percent were DOE, and 19.0 percent were CFA facilities.



The number of NPDES inspections (both EPA- and state-led) at federal facilities decreased by 15.5 percent, from 187 in FY 1995 to 158 in FY 1996. Exhibit ES - 11 presents federal facilities in SNC with NPDES according to agency. For FY 1995 and FY 1996, DOD facilities comprised approximately 60 percent and 76 percent, respectively, of federal facilities in SNC. Both the number of CFA and DOE facilities in SNC and their relative share decreased during this time period. For FY 1995 and FY 1996, therefore, the percentage of major federal facilities not in SNC was 76.2 percent and 73.0 percent, respectively.

Exhibit ES - 11

Major Federal NPDES Facilities in SNC by Agency Category

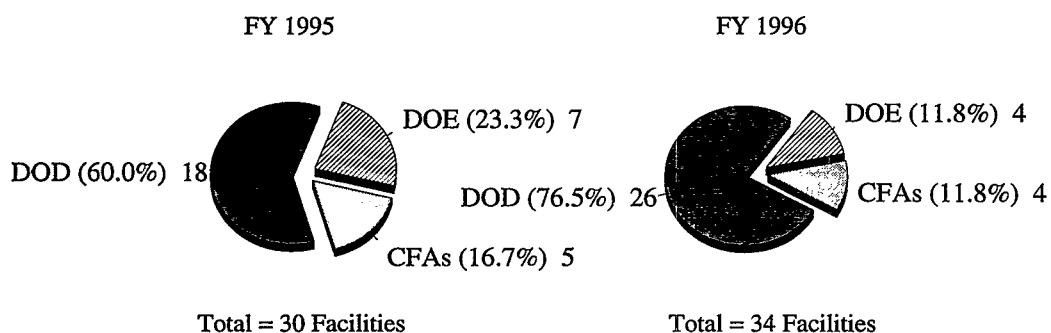
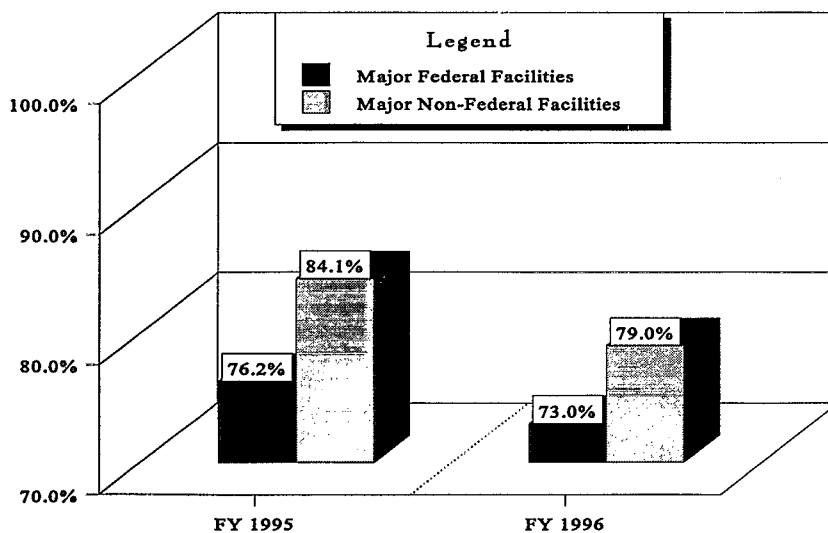


Exhibit ES - 12 compares the percentage of federal facilities not in SNC against corresponding compliance rates for the universe of major non-federal NPDES facilities. During both FY 1995 and FY 1996, the percentages of major federal facilities not in SNC were lower than for non-federal facilities.

Exhibit ES - 12

Federal vs non-Federal NPDES Compliance Rates (% not in SNC)



As shown in Exhibit ES - 13, EPA and states took 71 and 61 enforcement actions in FY 1995 and FY 1996, respectively, to address NPDES noncompliance at federal facilities.

Exhibit ES - 13
Type of NPDES Enforcement Actions at Federal Facilities

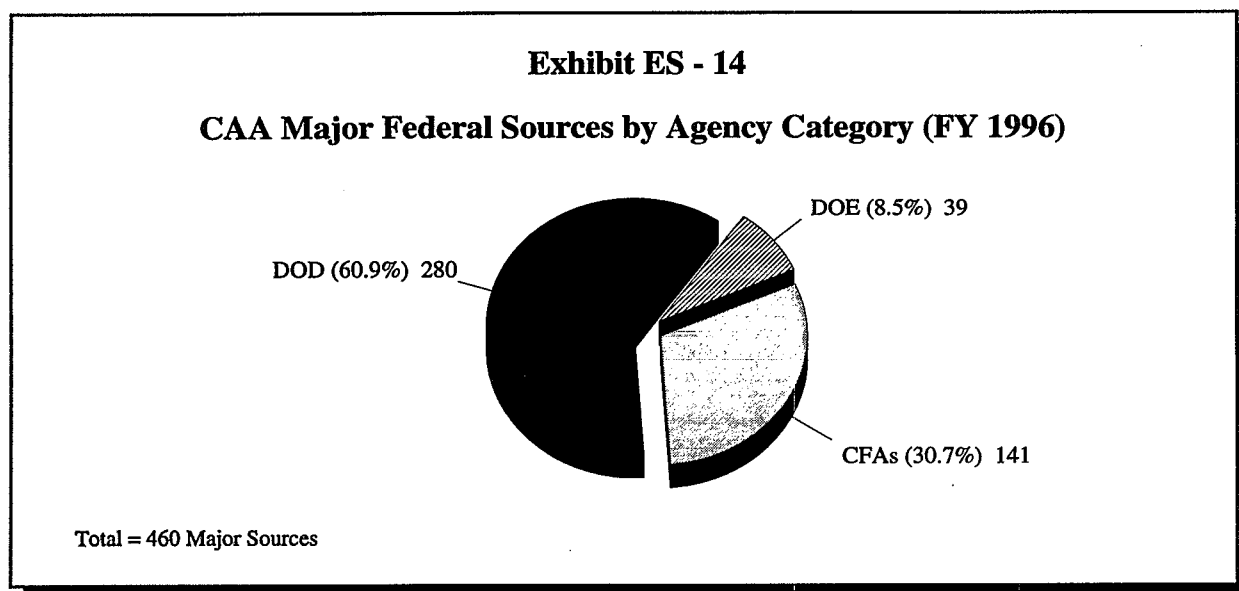
Type of Enforcement Action	Number of Actions in FY 1995	Number of Actions in FY 1996
Informal	42 (59.2%)	43 (70.5%)
Formal	20 (28.2%)	7 (11.5%)
Other	9 (12.7%)	11 (18.0%)
TOTAL	71	61

Clean Air Act

The CAA, as amended in 1990, is the primary federal statute regulating air emissions. To fulfill its mandate of air pollution protection, the CAA establishes four types of health, welfare, and technology-based standards and programs to prevent and control air pollution:

- National Ambient Air Quality Standards
- National Emissions Standards for Hazardous Air Pollutants
- New Source Performance Standards
- Prevention of Significant Deterioration of Air Quality.

In FY 1996, 460 major federal sources existed within the universe of 36,834 major sources regulated under all programs within the CAA. As shown in Exhibit ES - 14, 60.9 percent were DOD, 8.5 percent were DOE, and 30.7 percent were CFAs.



EPA and state inspectors conducted a total of 430 CAA inspections of major federal sources during FY 1996, an increase of almost ten percent relative to FY 1995. Some of these sources were inspected more than once during the year -- the actual number of major federal sources inspected was 244 in FY 1995 and 224 in FY 1996. Under the CAA, federal facilities may be subject to compliance requirements under multiple programs. A major source found to be in compliance with the provisions of one program, yet out of compliance with those of another, is considered to be out of compliance.

The overall compliance rates for major federal sources during FY 1995 and FY 1996 were 88.8 percent and 87.4 percent, respectively. As shown in Exhibit ES - 15, federal facilities experienced slightly lower CAA compliance rates than their non-federal counterparts.

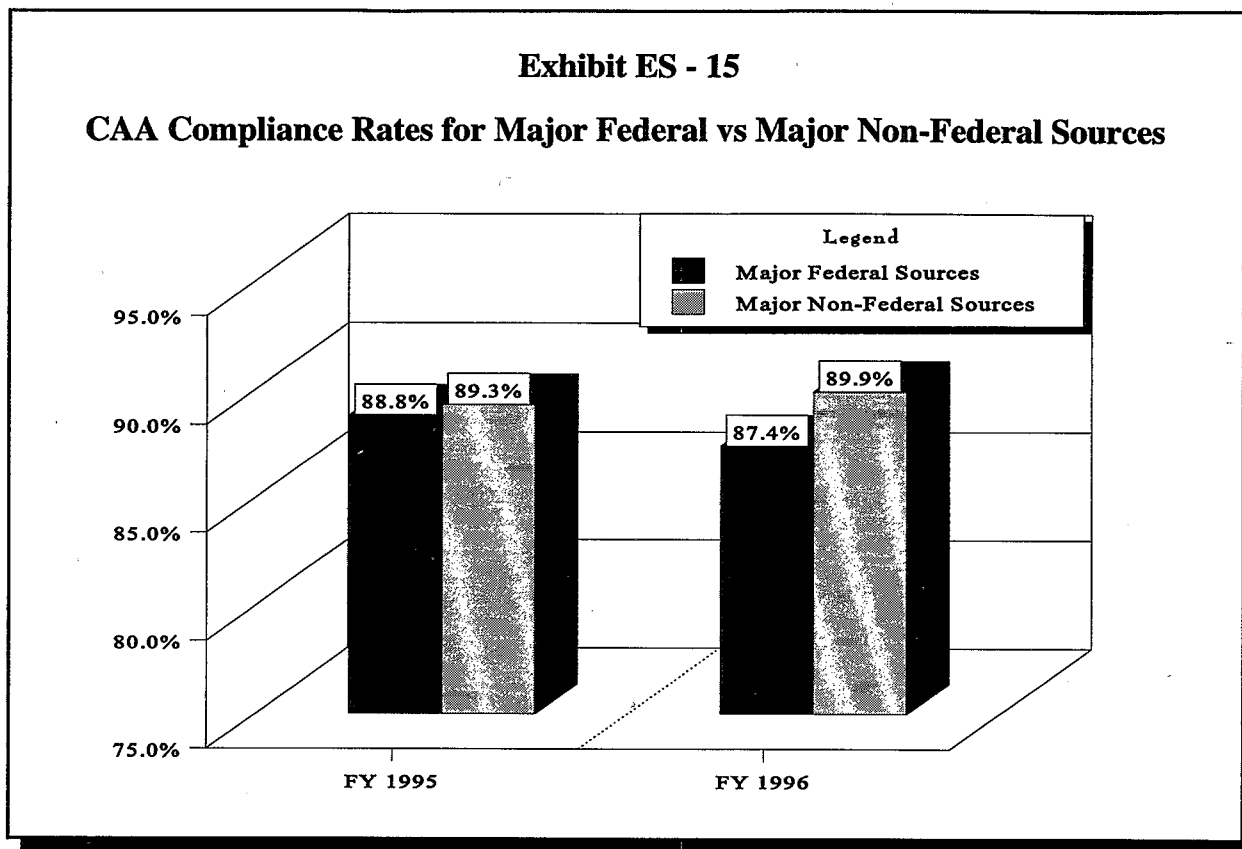


Exhibit ES - 16 breaks down individual CAA compliance data across agencies for FY 1995 and FY 1996. DOD and DOE compliance rates were both much higher than CFA compliance rates for FY 1995 and FY 1996. DOE compliance rates remained unchanged during this time period. Note that sources identified as “unknown” indicate that EPA or the state was unable to determine the compliance status of the source due to a lack of data, malfunctioning monitoring equipment, or other reasons.

Exhibit ES - 16
CAA Compliance Indicator Rates by Agency Category

Agency	In Compliance	Out of Compliance	Unknown	Total
FY 1995				
DOD	243 (92.0%)	21 (8.0%)	0 (0.0%)	264
CFAs	98 (81.0%)	17 (14.0%)	6 (5.0%)	121
DOE	33 (91.7%)	1 (2.8%)	2 (5.6%)	36
Total	374 (88.8%)	39 (9.3%)	8 (1.9%)	421
FY 1996				
DOD	249 (90.5%)	24 (8.7%)	2 (0.7%)	275
CFAs	101 (79.5%)	19 (15.0%)	7 (5.5%)	127
DOE	33 (91.7%)	1 (2.8%)	2 (5.6%)	36
Total	383 (87.4%)	44 (10.0%)	11 (2.5%)	438

EPA and states issued 21 and 25 NOVs at federal facilities during FY 1995 and FY 1996, respectively, for failure to comply with provisions of the CAA. The majority of NOVs were issued against DOD facilities. Although relative compliance rates were high among DOD facilities (see Exhibit ES - 16), because they comprise a much larger portion of the universe of federal facilities, DOD facilities still tend to receive the majority of the enforcement actions.

Asbestos Abatement at Federal Facilities

Due to the significant potential health hazards posed by asbestos abatement activities (i.e., removal, encapsulation), as well as the ubiquitous nature of asbestos in buildings constructed during the first half of this century, the asbestos NESHAP program has particular relevance for federal facility compliance.

During the period from the first quarter of FY 1995 to the fourth quarter of FY 1996, 338 federal facilities provided 1,301 notifications of planned asbestos abatement activities. Collectively, DOD facilities outnumber all other reporting facilities by more than a two-to-one margin, with Air Force installations comprising the largest share among DOD facilities.

Based on these notifications, EPA and the states conducted 278 inspections, with the vast majority (93.5 percent) being led by state authorities. Exhibit ES - 17 shows the number of inspections, violations, and enforcement actions for both years.

Exhibit ES - 17

Federal Facility Asbestos NESHAP Program Data

Year	Inspections	Violations		Enforcement Actions		
		Substantive	Notification	Warning	NOV	Order
FY 1995	136	5	10	1	13	0
FY 1996	142	4	9	0	14	0

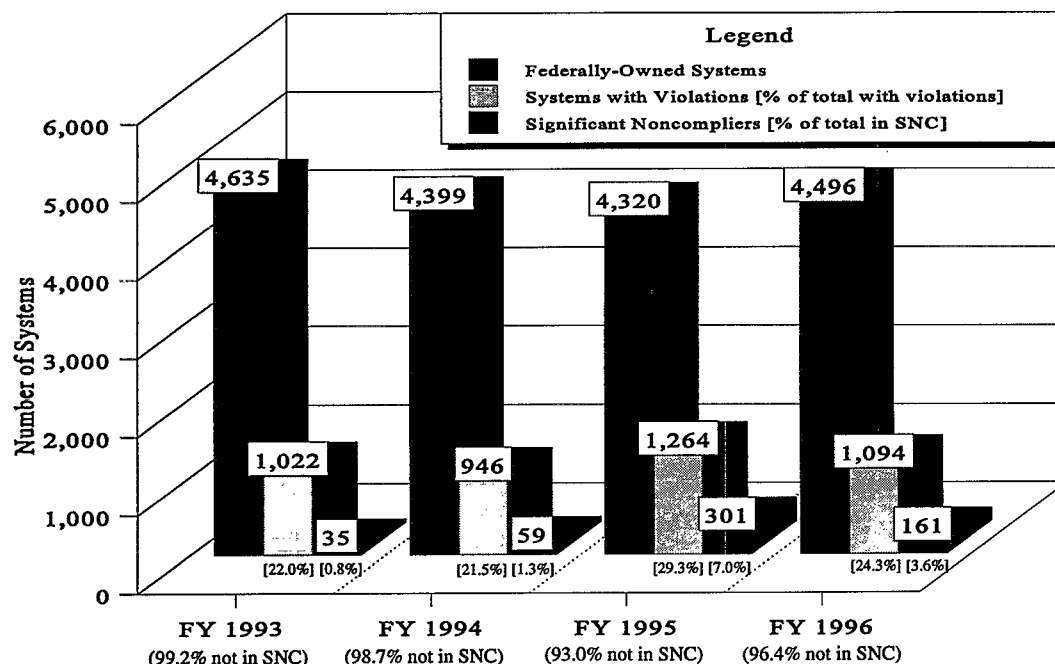
Safe Drinking Water Act

The SDWA is the basis for protecting public drinking water systems from harmful contaminants. To implement the law, EPA established the PWSS Program, which regulates all public water supply systems, as well as the Underground Injection Control (UIC) Program, which specifically protects underground sources of drinking water through the establishment of state wellhead and sole source aquifer protection programs.

In FY 1996, federal systems comprised approximately 2.6 percent (4,496) of the total universe of 173,279 systems regulated under the PWSS. Exhibit ES - 18 shows that overall compliance at federal systems under the PWSS has decreased since FY 1993. The number of federal systems cited for violations increased from 1,022 in FY 1993 to 1,094 in FY 1996. Moreover, because the number of federal systems actually declined, the percentage of systems with violations increased from 22.0 percent to 24.3 percent over the same period. Systems in SNC increased from 0.8 percent in FY 1993 to 3.6 percent in FY 1996. The corresponding percentages for systems not in SNC for FY 1995 and FY 1996 were 93.0 percent and 96.4 percent, respectively.

Exhibit ES - 18

PWSS Program Compliance at Federally-Owned Systems



Few federal systems received formal enforcement actions for violations under the PWSS, either from EPA or the states. The total number of federal systems receiving enforcement actions decreased from 18 in FY 1995 to 10 in FY 1996. No federal systems received Civil Referrals or had Criminal Cases filed against them during either year.

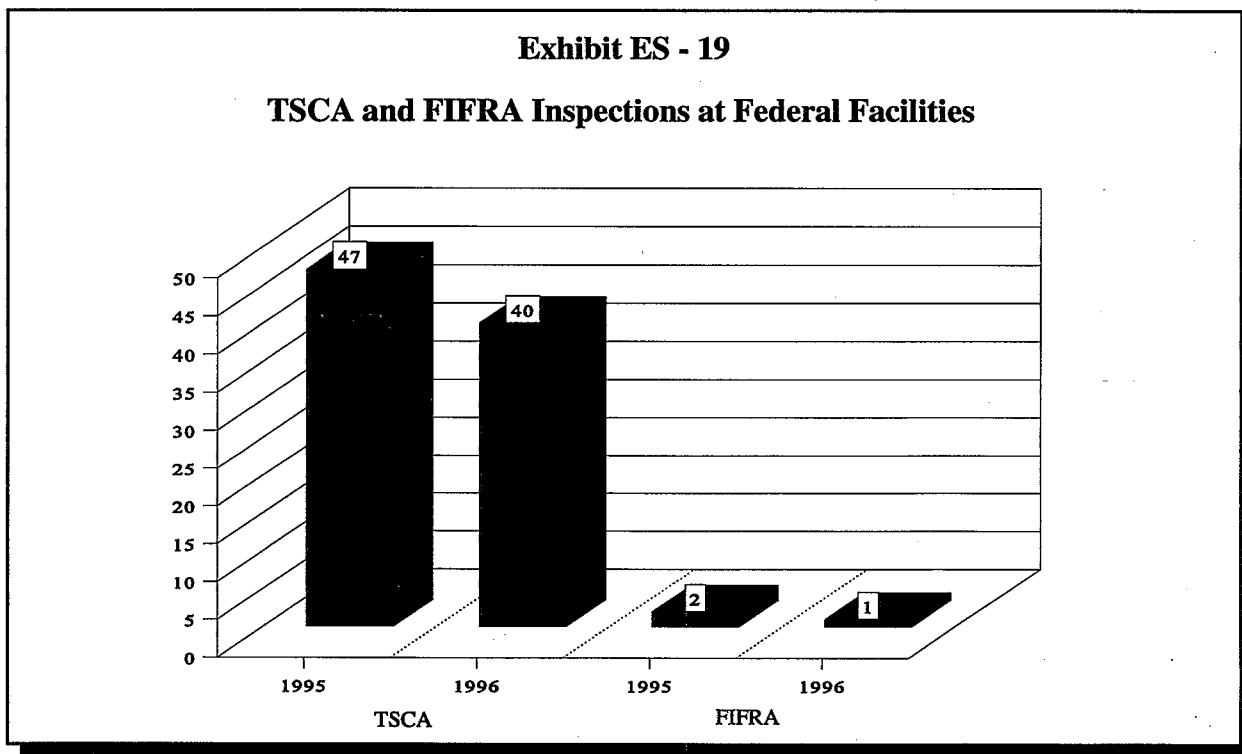
Toxic Substances Control Act & Federal Insecticide, Fungicide, and Rodenticide Act

The purpose of TSCA is to protect human health and the environment by requiring that specific chemicals be tested and that their processing and use be controlled or restricted as appropriate. FIFRA provides EPA with the authority to oversee the registration and use of pesticides and other similar products intended to kill or control insects, rodents, weeds, and other living organisms.

TSCA and FIFRA are not permit-based compliance programs (e.g., RCRA), nor do they involve any formal listing process whereby facilities meeting certain criteria are identified and tracked until they no longer meet these criteria (e.g., CERCLA). Moreover, the number and identity of facilities subject to TSCA change substantially from year to year, and many of the activities that subject an entity to FIFRA do not occur at a fixed location (e.g., a single firm

spraying pesticides, herbicides, etc. on agricultural land located throughout a wide geographical area). As a result, there are no readily definable TSCA or FIFRA universes. Facilities subject to these programs are identified and targeted for inspections through a variety of less formal means, including: self-reporting by entities of their intent to manufacture toxic substances or pesticides, third-party requests/complaints, and EPA/state evaluation of publicly available data (e.g., annual reports).

There were relatively few TSCA and FIFRA inspections at federal facilities during FY 1995 and FY 1996. Exhibit ES - 19 presents the number of inspections conducted under TSCA and FIFRA during FY 1995 and FY 1996.



By definition, all federal facilities found in SNC with TSCA are subject to formal enforcement actions. The type of action taken is referred to as a Notice of Noncompliance (NON). Under both TSCA and FIFRA, federal facilities, unlike commercial facilities, are not subject to penalties. EPA did not find any federal facilities to be in SNC with either TSCA or FIFRA during FY 1995 or FY 1996. In other words, there were no violations of TSCA or FIFRA at federal facilities that triggered an enforcement response at an administrative complaint level.

Emergency Planning and Community Right-to-Know Act -- TRI Reporting

The TRI, established under EPCRA, is a publicly available data base containing specific chemical release and transfer information from manufacturing facilities throughout the United

states. In addition, following the passage of the Pollution Prevention Act in 1990, the TRI was expanded to include reporting of additional waste management and pollution prevention activities.

In August of 1993, President Clinton signed Executive Order (E.O.) 12856, which required federal facilities to begin submitting TRI reports for calendar year 1994 activities. Federal facilities meeting the TRI chemical thresholds are required to file TRI reports, whether or not they are engaged in manufacturing. Government-owned contractor-operated (GOCO) federal facilities, however, are required to submit TRI reports, irrespective of the Executive Order.

TRI reports for each calendar year are submitted to EPA by July 1 of the following year. After completing data entry and quality assurance activities, EPA makes data available to the public in a printed report, in a computerized database, and through a variety of other information products. These products are usually released during the early spring of the year following submission of data; thus the information contained in this report, which is derived from data released in May of 1997, presents TRI reporting activity for calendar year 1995.

Prior to 1994, only GOCO federal facilities were required to submit TRI reports. These same facilities would continue to submit after 1994, assuming they met TRI thresholds, although they would be identified as federal facilities, not GOCOs. It should be noted, however, because the universe of reporting facilities has changed, comparisons of pre- and post- 1994 data may not be entirely valid.

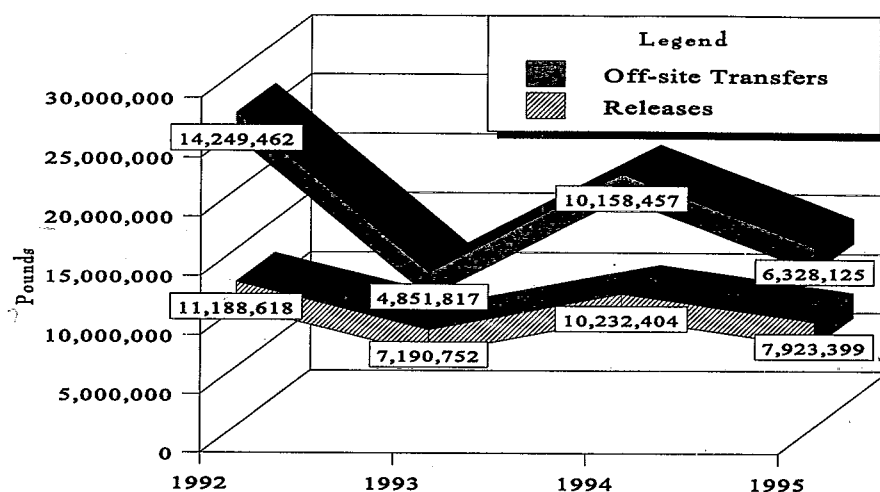
Federal facilities reported releases of approximately 7.9 million pounds of TRI chemicals in 1995, most of which (76.1 percent) consisted of releases to the air. Releases to air from stack air emissions exceeded fugitive sources by approximately 4.5 percent. Of the releases to environmental media other than air, the majority (13.3 percent) were accounted for by releases to land, followed by releases to water (6.4 percent) and releases to underground injection wells (4.1 percent).

Exhibit ES - 20 shows that TRI off-site transfers in the FY 92-93 timeframe decreased from 14.3 million pounds to 4.8 million pounds with 57 GOCO facilities reporting, then decreased from 10.2 million pounds to 6.3 million pounds with 142 federal/GOCO facilities reporting.

TRI releases decreased from 11.2 million pounds to 7.2 million pounds in the FY 92-93 timeframe, then decreased from 10.2 million pounds to 7.9 million pounds in the FY 94-95 timeframe.

Exhibit ES - 20

TRI Releases and Off-site Transfers at Federal Facilities (1992 -1995)

**EPCRA §313 Inspections**

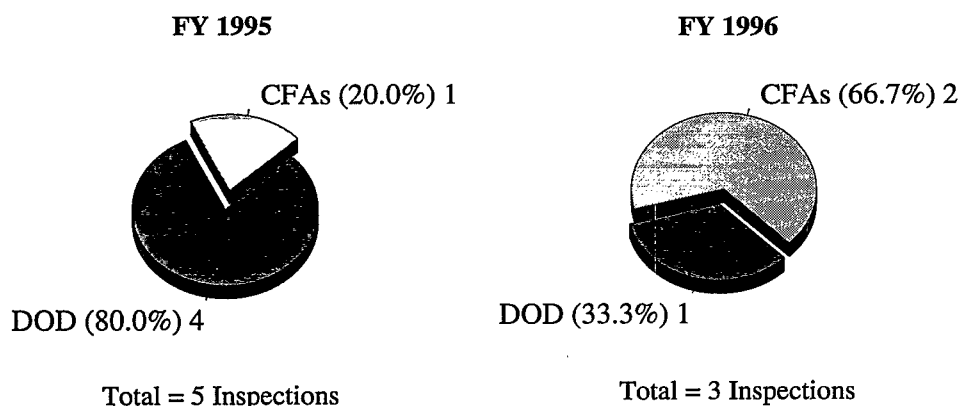
In addition to the standard reporting requirements of the EPCRA TRI program (EPCRA §313), EPA conducts a limited number of inspections at reporting federal facilities. Given the nature of the program, inspections conducted under EPCRA §313 tend to involve document reviews, although the process of verifying the accuracy of TRI reporting may involve some on-site field evaluations. Exhibit ES - 21 shows the number of EPCRA §313 inspections conducted at federal facilities during FY 1995 and FY 1996. Per section 5-502 of E.O. 12856, EPA Regions acted as the lead on all inspections during this period. In response to E.O. 12856, beginning in FY 1997, FFEO increased EPCRA §313 inspection activity at federal facilities.

EPCRA §313 Enforcement Actions

Per section 5-502 of E.O. 12856, federal agencies are not subject to the enforcement provisions of §325 and §326 of EPCRA.

Exhibit ES - 21

EPCRA §313 Inspections by Federal Agency Category



Comprehensive Environmental Response, Compensation, and Liability Act

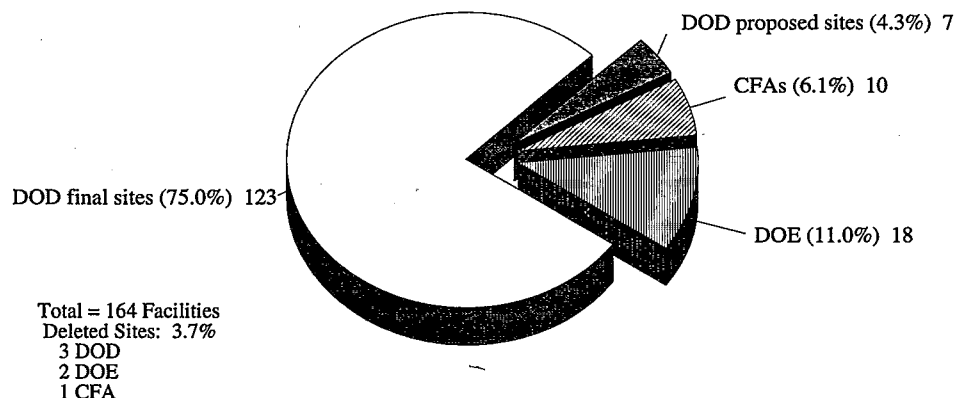
CERCLA authorizes the federal government to respond to situations involving past disposal of hazardous substances. Under CERCLA, parties causing or contributing to contamination are held responsible for cleaning up contaminated sites.

Section 120(c) of CERCLA requires EPA to establish a list of federal facilities that report hazardous waste activity under RCRA or §103 of CERCLA. The list, known as the Federal Agency Hazardous Waste Compliance Docket, is a key component in identifying potentially contaminated sites at federal facilities. From its inception in February of 1988 to the most recent update in March of 1995, the number of sites at federal facilities listed on the docket has nearly doubled, from 1,094 to 2,104.

The National Priorities List (NPL) is EPA's listing of the highest priority sites for cleanup. Exhibit ES - 22 presents the status of sites on the NPL located at federal facilities as of FY 1996.

Exhibit ES - 22

Federal Facilities on the NPL (FY 1996)



At the start of EPA's federal facilities enforcement program, EPA directed its resources largely to the completion of negotiations for CERCLA §120 interagency agreements (IAGs). These agreements made up the cornerstone of the enforcement program addressing the 151 final and seven proposed federal facilities listed on the NPL at the end of FY 1996. Each agreement contained specific schedules for the study and cleanup of hazardous substances at these facilities.

There were three and two additional federal facility CERCLA IAGs executed in FY 1995 and FY 1996, respectively. Of the federal sites listed on the NPL at the end of FY 1996, 134 are now covered by 125 IAGs.

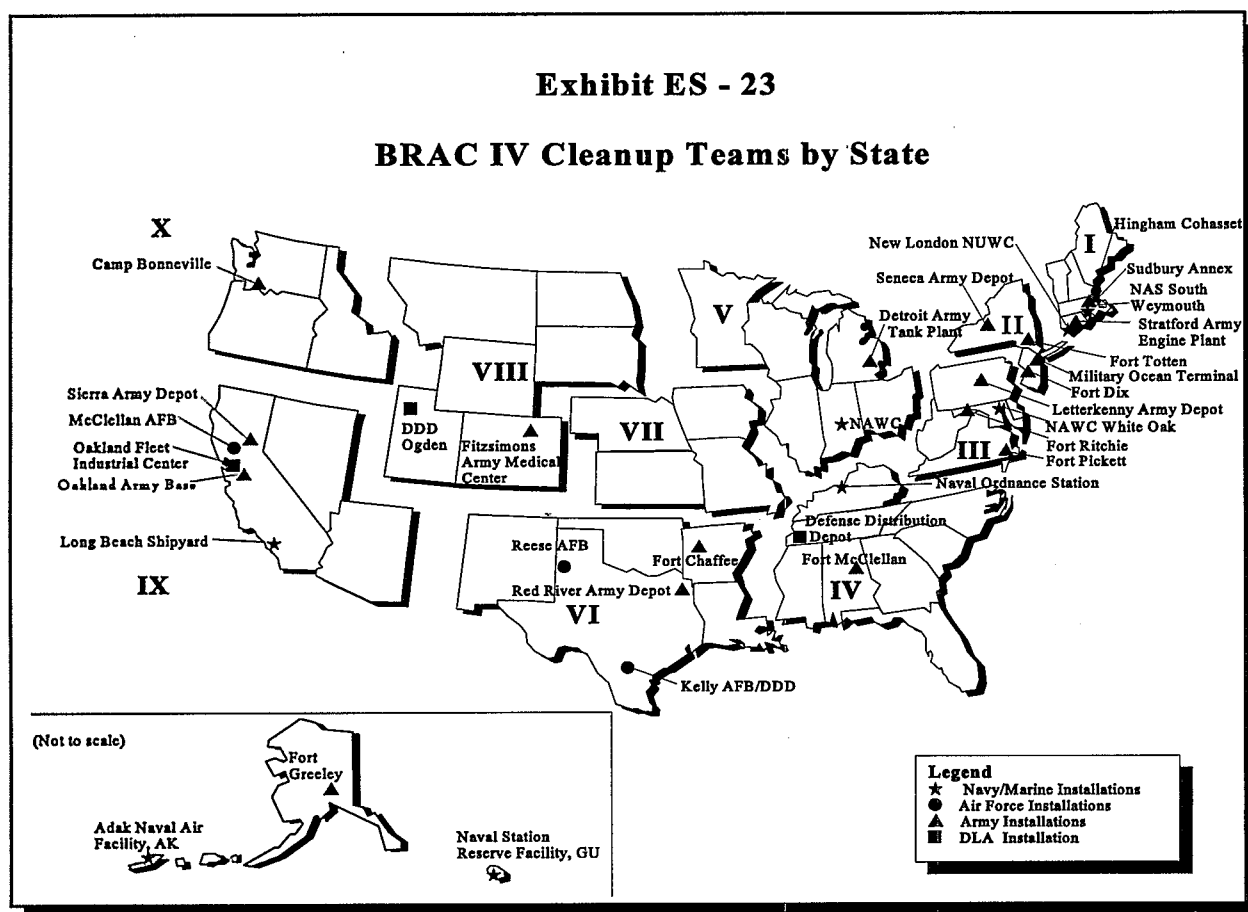
Base Realignment and Closure

The Base Realignment and Closure Acts of 1988 and 1990 provide for the realignment or complete closure of military installations based on revised force structure needs. The Acts stipulate that installations be chosen for closure or realignment in 1988 (BRAC I), 1991 (BRAC II), 1993 (BRAC III), and 1995 (BRAC IV).

EPA, DOD, and the states are charged with creating a working partnership to implement the President's Fast Track Cleanup Program at installations with environmental contamination and where property will be available for transfer to the community. The objectives of the Fast Track Cleanup Program are quick identification of clean parcels for early reuse, selection of appropriate leasing parcels where cleanup is underway, and hastening cleanup. The number of

Fast Track Cleanup locations is a subset of the total number of installations selected for closure or realignment.

DOD, EPA and state regulators have forged BRAC Cleanup Teams (BCTs) to deal with the complex environmental problems at Fast Track Cleanup locations. The BCTs are empowered to make decisions locally to the maximum extent possible and have the ability to raise issues immediately to senior level officials for resolution should the need arise. Exhibit ES - 23 presents the location of round IV BCTs throughout the country.



Conclusions and Next Steps

Continued assessment of compliance problems confronting federal facilities will provide EPA and states with the ability to strengthen their oversight programs. Future compliance assessments need to analyze the root causes of noncompliance to achieve environmental compliance goals within the federal sector.

EPA will continue to work with states, Indian Tribes, other federal agencies, and the public to achieve federal environmental leadership. Specifically, EPA will focus on the following key objectives:

- Determining the causes of noncompliance with environmental laws.
- Integrating multi-media inspection and enforcement strategies into standard environmental program requirements for federal facilities.
- Working with federal agencies to incorporate pollution prevention into their environmental management planning efforts.
- Involving the public in each stage of the federal government's environmental decision-making process.
- Applying the full range of enforcement authorities available under environmental laws.
- Ensuring compliance with negotiated enforcement agreements at federal facilities.
- Implementing a process for accelerating the cleanup of military installations slated for closure.
- Reducing the cost and increasing the effectiveness of environmental technologies.
- Training federal agency staff in the objectives and approaches for environmental cleanup and compliance.

