

CHAPTER 2 ENVIRONMENTAL COMPLIANCE

2-1. Policy.

a. Environmental laws and regulations implemented by Federal, state, and local governments should be considered prior to conducting OB/OD operations. Vigilance should be constantly exercised to ensure that any applicable changes in Federal, state, or local regulations are incorporated.

b. A temporary facility established to perform OB/OD operations is exempt from the permitting requirements established in the Resource Conservation and Recovery Act (RCRA) if the action is being conducted as a CERCLA response action on-site. There could be substantive requirements that must be considered. Office of Counsel should be consulted to determine the applicable laws and regulations on a site-specific basis.

c. Storage and disposition of wastes generated from OB/OD operations will be in compliance with RCRA and associated Federal, state, and local regulations.

2-2. Operations.

a. As an administrative requirement rather than a regulatory requirement, a closure plan for the OB/OD area will be prepared as part of the Work Plan submittal. The closure plan will document the type, number, and locations of the environmental samples that will be collected from the OB/OD area.

b. Prior to constructing the OB/OD area, environmental samples of the proposed area should be collected and analyzed at an off-site laboratory to determine if there is any pre-existing environmental contamination (e.g., explosives, metals, etc.) at the site. Reference EM 200-1-3 for sampling methods. Upon completion of the OB/OD operations, the OB/OD site will be dismantled and environmental samples should again be collected and analyzed to determine whether the OB/OD operations have caused any contamination. The results of the pre- and post-environmental sampling will be documented and submitted to the CO upon completion of the project.