

## CHAPTER 4

### ENVIRONMENTAL SUPPORT SERVICES

#### 4-1. Types of Services.

a. Environmental and Cultural Resources. The district can provide a wide range of services to support compliance with environmental and cultural resources laws and regulations, including:

(1) Environmental Assessment. An Environmental Assessment (EA) describes the impacts of a proposed action on the environment. The elements evaluated include wetlands, cultural resources, ecology, threatened and endangered species, socio-economic factors, air, water and noise pollution, fisheries, navigation, flood plains, and energy needs. An EA is prepared in accordance with the implementing regulation of the National Environmental Policy Act of 1969 and AR 200-1 and AR 200-2. It is coordinated via Section 309 of the Clean Air Act with the U.S. Environmental Protection Agency.

(2) Environmental Impact Statement. The Environmental Impact Statement (EIS) is normally a large, complex document that incorporates aspects of the Environmental Assessment, and usually includes more detail, time, funds and coordination. It is also prepared according to the implementing regulations of the National Environmental Policy Act of 1969 and AR 200-1 and AR 200-2. It involves notification via the Federal Register as well as wide coordination with various federal and state agencies and the public.

(3) Biological Assessment of Threatened and Endangered Species (BATES). The Endangered Species Act requires all Federal agencies to consult with the Secretaries of Interior and Commerce to ensure that their actions will not jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of critical habitats of such species. A BATES evaluates, via the Endangered Species Act of 1973, the potential impacts a proposed action may have on various threatened and endangered species. Following its completion, the draft document is coordinated with the U.S. Fish and Wildlife Service for either the "no jeopardy" or "jeopardy" determination.

(4) Evaluation of Dredge and Fill Material. Section 404(b)(1) of the Clean Water Act requires the evaluation of the environmental impacts a proposed dredge or fill action may have on biological and chemical integrity of a wetland area.

EP 420-1-1  
31 Jan 92

The evaluation, usually part of an Environmental Impact Statement (EIS) or Environmental Assessment (EA), is coordinated with the U.S. Environmental Protection Agency (EPA) in accordance with the Clean Water Act.

(5) Hazardous and Toxic Wastes (HTW). Districts can assist installations with cleanup of hazardous or toxic waste sites in order to comply with provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The district can assist in developing a comprehensive plan for hazardous/toxic waste remediation. The HTW plans also involve personnel requirements, contracting, health and safety, chemical data quality management, as well as program coordination. The District can also provide advice on how best to reduce wastes so as to minimize future environmental impacts and assure compliance with the Resource, Conservation and Recovery Act (RCRA). Preliminary HTW assessments and detailed HTW testing and sampling can also be performed to support site selections and NEPA documentation requirements.

(6) Environmental Audits. The district can assist installations in conducting internal and external Environmental Audits. This assistance can include preparation of the entire document or just certain facets. These audits, which are an environmental compliance review of facility operations, practices, and records to verify compliance with environmental laws and regulations, are important in developing annual RCS 1383 reports for reporting environmental funding requirements.

(7) Asbestos Surveys and Removal. Asbestos identification services for installations are performed by districts, usually through the use of indefinite delivery type A-E contracts. Districts can also effectively contract for asbestos removal.

(8) Cultural Resources Surveys and Evaluation. Cultural resources must be identified and evaluated as required by the Archeological and Historic Preservation Act of 1974 and the National Historic Preservation Act of 1966, as amended. Districts can assist an installation with investigations of any size: from a small plot to large multi-acre areas identified for new construction or training.

(9) Design Services for Air and Noise Abatement Projects. The district can perform design services for air and noise abatement projects, such as corrective actions for an incinerator not meeting state requirements/standards.

(10) Wetland Surveys. Districts can assist installations with project site selections and NEPA documentation by identifying, delineating and mapping wetland critical habitat areas.

b. Permitting. Regulatory authorities and responsibilities of USACE are based on Section 10 of the Rivers and Harbors Act of 1899 (33 USC 403) and Section 404 of the Clean Water Act (33 USC 1344). Section 10 requires a Department of Army permit for all work proposed within a navigable water of the United States. Section 404 requires a Department of Army permit for the discharge of dredged or fill material into waters of the United States, including wetlands. The district can provide this service to an installation, if needed, for such activities as river crossing sites, waterborne troop training exercises, etc.

c. Underground Storage Tank Program. This environmental program requires the inventory, survey, reporting and correction of underground chemical, petroleum, oil and lubricant storage tanks. The district can provide assistance in meeting survey and reporting requirements, and can help you develop and execute projects for correction of those identified as leaking. Cathodic protection system testing and evaluation, design and technical assistance are available for underground storage tanks. Such information is required for the installation, replacement or upgrade of steel or nonmetallic underground storage tanks and/or piping components. In addition, testing and technical assistance on maintenance contracts is available for existing cathodic protection systems. This program is also supported by standardized drawings and specifications which may expedite corrective actions, tank upgrade, replacement or installation projects.

d. Environmental Base Line Surveys/Preliminary Assessment Screening. These surveys are required for proposed real estate transactions. The surveys identify the current status of the installation, or portion thereof, regarding major or significant environmental impacts, hazardous and toxic wastes, asbestos, radon, flood plain management, wetland considerations, and biological resources.

e. Spill Prevention, Control Countermeasure Plan. This environmental program requires that a plan be developed to prevent chemical, petroleum, oil and lubricant spills on military installations. This plan or a separate plan should address actions required to immediately put into effect operations to contain and clean-up spills that do occur.

EP 420-1-1  
31 Jan 92

f. Landfill Closure Plan. The district can help prepare plans for closure of landfills at installations. A request to prepare this type of plan should be submitted two to three years in advance of the anticipated closure in order that all study and regulatory requirements can be met. Assistance with site selection for proposed landfills can also be provided.

g. Flood Plain Management. The objective of the Flood Plain Management Services Program is to support comprehensive flood plain management planning at all appropriate governmental levels and, thereby, to encourage prudent use of the nation's flood plains. Executive Order 11988 requires each federal agency, and its installations, to evaluate the effects of its actions on flood plains, and to avoid financing or issuing permits for construction in such flood prone areas unless no practicable alternatives are available. Information provided through this program includes flood hazard information as well as a full range of technical services and planning guidance on techniques for reducing flood damage and damage potential. Some of the technical services available at the district are:

(1) Flood Hazard Evaluation. Upon request, a district will evaluate the potential for flood damage at specific sites. This evaluation can range from simply providing an expected base flood elevation to the determination and analysis of possible protection improvements. This analysis would include the expected results of the improvement. Although this does not result in a detailed, designed project, it does provide information upon which to base funding needs.

(2) Floodway Determination. In the development of flood plain zoning, it is sometimes necessary to determine the area of the flood plain that is required to remain free of development in order to safely pass the base flood. Districts can determine these floodway requirements for an installation.

(3) Flood Plain Regulations. Districts can provide advice on proper use of an existing flood plain. This could include zoning regulations and development standards.

(4) Flood-Proofing. Providing guidance on flood-proofing methods and procedures is another service available. This action usually results in a modification to a structure to prevent or minimize potential flood damage.

(5) Emergency Flood Hazard Evacuation Studies. Special studies can be conducted to develop guidelines for flood emergency warning and evacuation at an installation. These studies would include plans for temporary shelter procedures and provide a base for development of a post-flood recovery plan.

#### **4-2. Regulatory and Statutory Guidelines.**

a. The National Historic Preservation Act of 1966, as amended (NHPA). This Act requires agencies to consider the effects that an undertaking will have on any resource eligible for inclusion on the National Register of Historic Places. The findings must be coordinated with the state Historic Preservation Officer and provided to the Advisory Council on Historic Preservation.

b. Archeological Resources Protection Act of 1979 (ARPA). This requires a federal land manager to issue a permit to any qualified archeological investigators working on public lands. This act prescribes criminal and civil penalties, along with forfeiture provisions for any person who uses any cultural resources without correct authorization.

c. The Clean Water Act, Section 404 (b)(1) Evaluation of Dredge and Fill Material.

d. National Environmental Policy Act of 1969.

e. The Endangered Species Act of 1973.

f. AR 200-1, Environmental Protection and Enhancement.

g. AR 200-2, Environmental Effects of Army Actions.

h. AR 420-40, Facilities Engineering, Historic Preservation.

i. Executive Order 11988, Flood Plain Management, 1977.

#### **4-3. Who Provides These Services.**

Within USACE, the environmental program has experienced rapid growth and is still evolving in many districts. For any requested environmental services, the Installation Support Coordinator will forward the installation's request to either the Planning Division, the Environmental Resources Branch, the Regulatory Program Branch or other appropriate office.

EP 420-1-1  
31 Jan 92

Additionally, USACE has designated a number of districts to specialize in hazardous, toxic, radiological waste (HTRW) and general environmental support work. Generally, one district per division is designated as the HTRW center of expertise and Environmental Support District. These districts will have specialized personnel who are extensively trained in environmental matters. If an installation's normal direct support district is not an HTRW center of expertise or an Environmental Support District, the installation can access the specialized services through their direct support district. In any case, an Installation Support Coordinator is available to assist in processing installation requests. The Installation Support Coordinator can also arrange for specialized environmental support from USACE laboratories, USACE Civil Works districts, or the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA).

#### **4-4. How To Obtain These Services.**

Use an Installation Support Request Form, call or write to the district Installation Support Coordinator to initiate a request for service. The installation should be prepared to supply the following:

- a. An Installation Support Request Form prepared in general accordance with the sample format (Figure 4-1) at the last page of this chapter. This form gives a narrative summary of work or services required. After the support request is evaluated:
- b. Copies of installation records needed to provide the service.
- c. Applicable documents, correspondence, or regulations.
- d. Document transmitting funds to the district office.

#### **4-5. Typical Funding and Time to Accomplish the Service.**

a. Costs and time required for environmental services, and sources for funds. When a request for service is received by the district, a time and cost estimate will be prepared and negotiated with the installation. The time and cost for accomplishing the various requests can range from routine requests requiring a few hours, costing several hundreds of dollars, to the more complex evaluations, including field surveys, requiring several man-months of effort and thousands of dollars.

No two environmental support requests are exactly alike, and time and costs must be tailored to specific requirements. However, some examples of the average time and cost for typical services are as follows:

- (1) Historic Preservation Plan (HPP)  
- 6 to 12 months (\$25,000 to \$100,000).
- (2) Environmental Assessment (EA)  
- 3 to 12 months (\$10,000 to \$100,000).
- (3) Environmental Impact Statement (EIS)  
- 18 to 36 months (\$75,000 to \$250,000).
- (4) Asbestos Identification  
- varying time (four to six cents per square foot of floor area inspected, with identification services comparable to those of a typical design contract).
- (5) Environmental Baseline Study (EBS)  
- 3 to 6 months (\$10,000 to \$50,000)

b. Current Army funding policies normally require that environmental services, except wetlands determination, from the district be funded by the installation on a cost-reimbursable basis. Usually, installation Operation and Maintenance funds are used for this purpose. In exceptional cases, such as the base realignment and closure initiative, limited funds are available from Headquarters, Department of the Army to support these environmental studies. In each case the funding must be furnished to the district prior to starting the project.

#### **4-6. Examples of Environmental Services.**

a. Districts have prepared numerous EAs that often incorporate many of the other documents highlighted in this pamphlet.

b. Environmental Impact Statements have been prepared ranging in complexity from the development of additional family housing at an installation to the construction of a harbor complex for TRIDENT missile submarines.

c. Some entire installations are designated as historic, while others have limited or no historic structures. Districts have assisted installations in entering many facilities on the National Register of Historic Places, or in coordinating actions for facilities eligible to be on the Register.

EP 420-1-1  
31 Jan 92

d. District assistance was provided to an installation in preparing a flood contour map of the entire 140,000 acre installation, including identification of several flood ways. This map has become a part of the installation master plan. In a broader sense, districts have used their technical expertise in flood plain management to help other federal agencies and installations deal with floods and flood-related matters. Flood plain management services have been provided in support of land disposal actions associated with the base realignment and closure initiative.

e. An ICUZ study was performed for an Air Force Base and real estate noise easements were purchased as a result of the study. A noise buffer, based on measurements taken as a part of the study, virtually eliminates noise complaints from aircraft operations in the vicinity. In another instance, at an Army installation, district environmental personnel, along with an environmental attorney, were able to react to the efforts of a nearby community to limit the Army's use of installation firing ranges.

INSTALLATION SUPPORT REQUEST		
INSTALLATION: Ryan Air Force Base	PROJECT NUMBER: RAFB-1234	
PROJECT TITLE: Perform Asbestos Removal, 10 WWII Buildings		
TYPE OF WORK: <input type="checkbox"/> PLANNING <input checked="" type="checkbox"/> ENVIRONMENTAL <input type="checkbox"/> STUDY <input type="checkbox"/> DESIGN <input checked="" type="checkbox"/> CONSTR MGMT <input type="checkbox"/> REAL ESTATE <input type="checkbox"/> A-E CONTRACT SELECTION <input type="checkbox"/> OTHER		
CURRENT WORKING ESTIMATE: \$40,000		
BASIS OF ESTIMATE: _____ DATE PREPARED: 18 Sep 90		
DESCRIPTION OF WORK/SERVICE REQUIRED: <b>PLEASE BE SPECIFIC !</b> Perform asbestos survey and removal on 10 WWII dormitory buildings in the north portion of Ryan AFB. These buildings are planned for disposal, but must be cleared of asbestos prior to any action being taken. Dormitories have been vacant since Sep 89. Building numbers are 3381 through 3390 and are shown on the attached site plan. No prior survey work has been done on these buildings.		
SPECIAL CRITERIA/DESIGN REQUIREMENTS: Disposal must occur prior to Jul 93 in order to clear the site for an approved new dormitory construction project.		
PROJECT AUTHORIZATION: _____ DD 1391 _____ DA 4283 <input checked="" type="checkbox"/> OTHER		
CONSTRUCTION AGENT: <input checked="" type="checkbox"/> DISTRICT _____ INSTALLATION		
CRITICAL NEED DATES: DESIGN START: _____ COMPLETE: _____ CONSTRUCTION CONTRACT AWARD: 30 Sep 92 CONSTRUCTION START: Oct 92 COMPLETE: Jul 93		
AVAILABILITY OF AS-BUILT DRAWINGS: Attached		
AMOUNT OF START-UP DESIGN FUNDS ATTACHED: \$40,000		
INSTALLATION PROJECT MANAGER: I. M. Topgun		
TELEPHONE: (COM'L) (123) 456-6789 (AV) 987-6777		
FACSIMILE: (123) 456-9000 OFFICE SYMBOL: DEEE-V		
INSTALLATION ENGINEER OR AUTHORIZED REPRESENTATIVE		
SIGNATURE	TITLE	DATE
Thomas Magnum	Ch, DEEE-V	15 Jan 91

Figure 4-1. SAMPLE FORMAT-INSTALLATION SUPPORT REQUEST INVOLVING ENVIRONMENTAL SUPPORT