



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
**U.S. ARMY CORPS OF ENGINEERS**  
441 G STREET, NW  
WASHINGTON, DC 20314-1000

14 January 2013

CEMP-CED (200-1a)

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Formerly Used Defense Sites (FUDS) Removal Action Approval Process Interim Guidance Document (IGD)

1. **PURPOSE:** This IGD details the process all Divisions and Program/Project Management Districts who manage and/or execute FUDS projects shall follow to obtain approval for conducting either a Time Critical Removal Action (TCRA) or a Non-Time Critical Removal Action (NTCRA) for HTRW or MMRP projects on FUDS properties.
2. **APPLICABILITY:** This guidance is applicable to all Divisions and Program/Project Management Districts who manage and/or execute FUDS projects. This process will:
  - a. Be incorporated into the next revision of USACE's Engineer Regulation 200-3-1 (Ref. 3.b)
  - b. Remain in effect until rescinded or otherwise superseded.
3. **REFERENCES:**
  - a. DoD Manual (DoDM) 4715.20, Defense Environmental Restoration Program (DERP) Management, 9 March 2012.
  - b. Engineer Regulation (ER) 200-3-1, Formerly Used Defense Sites Program Policy.
4. **REQUIREMENTS AND PROCEDURES:** A removal action approval memorandum (RAAM) is required by FUDS policy to document the rationale to conduct either a TCRA or NTCRA and is prepared as soon as the need for the removal action has been determined. The RAAM serves three functions:
  - Secures management approval to conduct the removal.
  - Documents that a removal action is appropriate given the conditions at the site and the hazard that is posed to human health, safety and the environment.
    - Provides concise, relevant information pertaining to the site background; threats posed to public health, safety, or the environment; and projected costs.
5. **PROGRAMMING AND APPROVAL PROCESS:** A TCRA is programmed in the IRA phase in FUDSMIS. A NTCRA is programmed in the EE/CA phase followed by the RmD and RmA-C phases. These removal action phases are locked in FUDSMIS for HTRW and MMRP

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Projects, and FUDS Project Management (PM) Districts shall not be able to program funding for a removal action until the RAAM review and approval process has been completed. At that time, these phases shall be unlocked in FUDMIS by CEMP-CED.

#### 6. RAAM REVIEW AND APPROVAL PROCESS:

a. The PM District shall prepare a RAAM. The memorandum shall provide information adequate to justify the need to conduct a removal action. The memorandum shall be prepared in coordination with the Project Delivery Team, including counsel. The memorandum is not intended to be an exhaustive reiteration of information about the project, but rather should be a concise description of the specific site condition that poses sufficient hazard to warrant a removal action. A typical approval memorandum should not exceed three pages in length. Refer to enclosed worksheet for a sample Removal Action Approval Memorandum outline.

b. The PM District shall submit the draft RAAM to the EM CX for review and concurrence. Concurrently, the draft approval memorandum shall be sent to the Division FUDS Program Manager (PgM) and CEMP-CED for information.

c. The District Project Manager shall provide a requested suspense date to the EM CX. The EM CX lead shall coordinate with the District Project Manager if the suspense cannot be met. For planning purposes, allow 10 working days for EM CX review and submittal of comments to the PM District.

d. If the EM CX concurs with the decision to conduct the removal action, written concurrence shall be provided to the District Project Manager.

e. If the EM CX does not concur with the decision to conduct the removal action, the EM CX lead shall coordinate with the District Project Manager via a phone call, written response to comments, email, etc. to discuss non-concurrence issues. If issues are resolved, final written concurrence shall be sent from the EM CX to the District Project Manager summarizing issues discussed and the resolution and shall serve as documentation of concurrence from the EM CX. If non-concurrence issues cannot be resolved with the PM District, the EM CX lead shall document the unresolved issues and forward a copy to the Division FUDS PgM. The Division PgM shall coordinate with the EM CX to resolve issues. If non-concurrence issues cannot be resolved with the Division PgM, the EM CX lead shall notify CEMP-CED and provide a memorandum of the non-concurrence. CEMP-CED shall make the final determination as to whether or not the PM District may proceed with the removal action.

f. Once final EM CX concurrence has been obtained, the PM District shall provide the EM CX concurrence and the RAAM to the Division FUDS PgM. The Division PgM shall sign the

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RAAM and forward a copy to CEMP-CED, who shall unlock the appropriate phases in FUDSMIS.

g. In cases where a TCRA must be initiated in less than 15 working days, an e-mail message from the PM District to the Division PgM, with copies furnished to the EM CX and CEMP-CED, shall serve as the Removal Action Approval Memorandum. The e-mail message shall contain adequate information to justify the need to conduct a removal action. HQ shall unlock the IRA phase in FUDSMIS to allow reprogramming of the funds to start the removal action. An Action Memorandum must be submitted within 15 working days of the start of the response.

7. EFFECTIVE DATES: The requirements and procedures set forth in this IGD are effective immediately. They will remain in effect until ER 200-3-1 is republished.

8. DISTRIBUTION: Approved for public release; distribution is unlimited.

9. POINT OF CONTACT: For additional information, please contact Mr. Julian Chu, FUDS National Program Manager, at 202-761-1869.

Encl



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**Enclosure -- Removal Action Approval Memorandum (RAAM) Outline**

1. Subject. Include the FUDS Property name and project number (eleven digits).
2. Background. This should be a very brief discussion of the project background and identify the project Project Manager.
3. Description of the Risk/Hazard to Public Health, Safety, or the Environment Posed by the Release or Threat of Release at the Project Location and the Expected Consequences of not Implementing a Removal Action. Include justification for removal response based on the NCP removal factors and site-specific conditions.
4. Proposed Action. Provide summary of the proposed action (including type: TCRA or NTCRA) to abate, prevent, minimize, stabilize, mitigate or eliminate the release or threat of release.
5. Regulatory Enforcement Activities (if any).
6. Schedule and Estimated Cost. Indicate the time frame in which the removal response must be initiated. In addition, provide estimated cost information (RmA-C only) that affects the signature authority for the subsequent Action Memorandum that shall be prepared.
7. Approval and Signature. The Division FUDS PgM signs the Removal Action Approval Memorandum