

## **CHAPTER 9: ADMINISTRATIVE CONTROLS, EXCAVATION CLEARANCES**

### **1. PURPOSE**

This chapter establishes the procedures and responsibilities for implementing administrative controls at FGA and the process for reviewing and approving requests for excavation activities at FGA.

Administrative controls are limitations on the use and activities at certain locations at FGA because of historical, existing, suspected, or potential contamination. Some administrative controls may be specified in formal agreements with state or federal regulatory agencies as remedies for sites in lieu of, or in addition to, physical remediation activities. Administrative controls may include:

- Access controls and limitations, including signage and delineation
- Land use controls
- Prohibitions or restrictions on land disturbing activities (e.g., excavation)
- Prohibitions or restrictions on water use, including groundwater

The excavation clearance process requires review and approval prior to any land disturbing or excavation activities to insure that the activity complies with any applicable administrative controls, is consistent with FGA's masterplan, and will not interfere with existing or planned utilities.

### **2. SCOPE**

This procedure is applicable to all installation activities, tenants, contractors and other activities or personnel that occupy, use, build, repair or maintain facilities at FGA.

### **3. RESPONSIBILITIES**

#### ***a. Garrison Commander***

The Garrison Commander is the responsible official for environmental compliance at Fort Greely and provides overall policy and guidance associated with environmental compliance. The Commander will consult regularly with FGA ENV to insure that the installation's environmental policies and procedures are consistent with federal, state and Army requirements and are properly implemented. The Commander will consult regularly with all installation tenant organizations and departments and facilitate resolution of conflicts regarding environmental matters that cannot be resolved at lower levels.

#### ***b. FGA Department of Public Works (DPW)***

- (1) DPW Director

The DPW Director manages all DPW activities at FGA and will insure that DPW activities are consistent with any applicable administrative controls and the excavation clearance request process. The DPW Director is responsible for approving, conditionally approving, or disapproving excavation clearance requests submitted under this procedure. The DPW Director will concur in any agreements with state or federal regulatory agencies regarding the scope and nature of administrative controls.

(2) DPW Environmental Division (FGA ENV)

FGA ENV will advise all installation activities, tenants, contractors and personnel at FGA of applicable administrative controls and monitor compliance with administrative controls. FGA ENV will participate in any discussions or negotiations regarding the scope and nature of administrative controls and submit any required reports to state or regulatory agencies. FGA ENV is responsible for concurring in excavation clearance requests submitted under this procedure prior to approval or disapproval by the DPW Director. As the Garrison Commander's environmental representative, FGA ENV will be the point of contact for interface with Federal, State, and local environmental regulatory agencies on all environmental compliance matters associated with Garrison and tenant activities.

(3) Other DPW Units

The Fire Department, Utilities, Engineering, and Maintenance and Operations Divisions will concur in excavation clearance requests submitted under this procedure to insure consistency with installation plans, safety procedures and to protect buried infrastructure and utilities.

***c. DA Police, 59<sup>th</sup> Signal Brigade, Verizon, GCI Cable, GVEA***

These organizations concur in excavation clearance requests submitted under this procedure to insure consistency with installation plans, safety procedures and to protect buried infrastructure and utilities.

***d. USASMDC Environmental Division (SMDC-ENV)***

SMDC-ENV administers the Army Environmental Center's Installation Restoration Program (IRP) for FGA and manages site investigations and remediation activities via the compliance program in coordination with FGA ENV. SMDC-ENV, in coordination with FGA ENV, develops remedies, including administrative controls, and site investigations for contaminated sites and coordinates their implementation with state and federal regulatory agencies.

Additionally, SMDC-ENV oversees mission-related activities regarding compliance with administrative control requirements at FGA, facilitates contractual support to FGA-ENV upon request, and provides assistance when requested by FGA-ENV with environmental program management and execution. SMDC-ENV coordinates permitting activities with MDA and assists FGA-ENV in liaison with state and federal regulatory agencies.

***e. Installation Management Agency – Pacific Area Region Office (IMA-PARO)***

The IMA-PARO oversees environmental management and compliance activities at Fort Greely and provides resources for environmental program implementation. IMA-PARO insures Fort Greely’s environmental program conforms to DoD and Army requirements and provides policy and programmatic guidance to FGA ENV.

***e. Missile Defense Agency – Ground-based Missile Defense (GMD)***

The GMD, through the Fort Greely Site Manager, manages all operations and activities at the Missile Defense Complex (MDC). The Site Manager will insure that all contractors and personnel providing services or conducting operations at the MDC comply with this procedure and any related federal and state environmental requirements. The Site Manager will promptly consult with FGA ENV and/or the Garrison Commander, regarding any special considerations (e.g., security) or other issues that may affect environmental compliance at the MDC

***e. Tenants, Contractors, FGA Waste Generating Activities***

Tenants, contractors, FGA waste generating activities are responsible to comply with the applicable provisions of this procedure.

**4. OPERATIONS**

***a. Administrative Controls***

FGA ENV will make available to installation activities, tenants, contractors and personnel at FGA a description of the location and nature of administrative controls in place at FGA. Administrative controls currently in force at FGA are listed in Attachment 1. These administrative controls are also illustrated in reference maps at the FGA ENV office.

FGA ENV will update Attachment 1 and related maps as necessary to reflect in changes or additions to administrative controls at FGA. Changes in administrative controls may occur based on further site investigations, completed remedial actions, or future agreements with state and federal regulatory agencies. FGA ENV and SMDC-ENV may, on occasion, consider case-by-case adaptations to the controls identified in Attachment 1 to accommodate individual project requirements. However, any adaptations will be considered only in exceptional situations and may require alternative protective measures.

***b. Excavation Clearances***

Installation activities, tenants, contractors and personnel at FGA proposing to undertake land disturbing activities at FGA must submit the excavation clearance request form (i.e. ‘dig permit’) in Attachment 2 at least 5 working days prior to the beginning of the activity. The activity cannot be initiated until the request is approved or conditionally approved by the DPW Director. The proponent of the activity must obtain the clearances shown on the clearance request form prior to submittal to the DPW Director. In special or unanticipated circumstances, the DPW Director may agree to consider a clearance request less than 5 working days prior to beginning the activity. FGA ENV will receive the clearance request before the DPW Director and provide environmental analysis.

**5. SURVEILLANCE**

FGA ENV will periodically inspect excavation activities and locations subject to administrative controls. Any instances of non-compliance will be recorded and brought to the attention of the non-complying party and the DPW Director. If a satisfactory resolution of the matter cannot be achieved with the non-complying party, the Garrison Commander will be informed of the conflict.

**6. RECORD KEEPING**

***a. FGA ENV***

FGA ENV will retain copies of all excavation clearances and related materials (e.g., location maps, details of work, etc.), agreements with state or federal regulatory agencies regarding administrative controls, and inspection reports prepared under this procedure. FGA ENV will maintain a list of current location descriptions and associated administrative controls applicable at FGA.

***b. Installation Activities, Tenants, Contractors and Personnel at FGA***

Installation activities, tenants, contractors and personnel at FGA undertaking land disturbing activities will retain copies of the approved excavation clearance request and insure that personnel performing the activity have a copy of the approved request on-site and are knowledgeable of the terms and conditions of the approval.

**7. REPORTING**

***a. FGA ENV/SMDC-ENV***

FGA ENV and/or SMDC-ENV will make any required reports to state or federal regulatory agencies and serve as FGA’s primary point of contact with regulatory agencies.

SMDC-ENV will make reports and provide information associated with the IRP. FGA ENV will make reports and provide information for general matters and activities taken under the compliance program.

***b. Installation Activities, Tenants, Contractors and Personnel at FGA***

Installation activities, tenants, contractors and personnel at FGA have an obligation to timely report to FGA ENV any instances of non-compliance with an administrative control or the terms and conditions of an approved excavation clearance request.

**8. REFERENCES**

- a. Parcel-Specific Environmental Baseline Survey for Potential NMD Program Facilities, Fort Greely, Alaska, January 2000
- b. Draft Environmental Baseline Survey Report, Woodward-Clyde, July 12, 1996
- c. U.S. Army Alaska Institutional Control Policy
- d. Environmental Sites Decision Document, Draft for Public Comment, March 2005