

FUDS and OE Contamination in Guam, CNMI, and Off-Shore Pacific Waters: Potential Impact on an Oil-Hazmat Response & How To Get Assistance

What Is This?

The Formerly Used Defense Sites (FUDS) Program was established by DOD to address the assessment and remediation of sites contaminated by DOD activities and now owned by public agencies, tribes, or private individuals; ownership of the affected land was turned over by DOD prior to October 17, 1986. Information on FUDS is maintained by the US Army Corps of Engineers, and there is a small annual budget for site work (about \$ 220 M nationally); estimated cost of cleanup for the 10,000 properties in the FUDS inventory (FUDSMIS) is about \$18 B; Region IX has 2,500 of the FUDS properties and also the majority of the ordnance and explosives sites. Contamination for FUDS falls into categories: HTRW (Hazardous, Toxic, Radioactive Wastes); CON HTRW (Containerized HTRW = tanks); BD/DR (Building Demolition/Debris Removal); OE (Ordnance and Explosives; also known as UXO [Unexploded Ordnance], MME [Military Munitions and Explosives], DMM [Discarded Military Munitions], and MEC [Munitions and Explosives of Concern], etc. etc.

OE properties are ranked by Risk Assessment Codes, with RAC-1 being the most hazardous and RAC-5, the least. This ranking system is based upon a number of factors, including proximity to population – so a site ranked as RAC-3 or RAC-4 may be in a remote location, but it could still pose an immediate explosive hazard if a responder were to go to that location in order to perform a hazmat cleanup.

Guam and CNMI Situation

Since Guam and CNMI were once active battle sites during World War II and were storage sites for OE planned for use in the invasion of Japan (and following the conclusion of WW II, the sites for immediate disposal of this OE – dumped into the ocean, buried on land and in caves), there remains a significant risk even today that one may encounter OE whenever there is an excavation or other disturbance of the environment. OE continues to wash up on the shores and to be found on land; as a routine occurrence public safety officials respond to 911 calls from people finding the material, and the USN EOD unit is asked to pick up and dispose of the material.

During the recent cleanup at Tanapag Fuel Farm in Saipan, FOOSC Michelle Rogow reported finding a grenade of Japanese origin in one of the collapsed tanks she was removing.

There has been offshore dumping of chemical munitions and other OE throughout the Pacific in the areas which are part of the jurisdiction of the ORRT. There have been reports of dredge personnel, working in waters more than 1000 feet deep, being injured by releases from chemical munitions brought to the surface by the dredging.

USEPA's FUDS Program in Region IX

Implementation of the FUDS Program for DOD has been assigned to the USACE. Regulatory agencies at the Federal and State/Territorial levels overview the Program and land and resource managing agencies with FUDS in their midst also are part of the overview process.

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A network of stakeholder agencies has been established for each of the two USACE Divisions in Region IX: Pacific Ocean Division (POD) which includes Hawaii, CNMI, Guam, and American Samoa; South Pacific Division (SPD) which includes Arizona, California, and Nevada. The stakeholders meet at least annually with the USACE Divisions to go over issues of concern, budgets, planned activities, and other elements of the FUDS Program.

State Management Action Plans (SMAPs) for Pacific

SMAPs were established by the USACE as a way of working with the regulatory agencies to develop a life-cycle strategy for the prioritization and remediation of each FUDS property. SMAPS have been signed for State of Hawaii (2005) and Guam (2007) and there is a draft SMAP currently for CNMI. American Samoa has not yet requested a SMAP, but discussions on this topic are planned for this year.

Recent FUDS Activities in the Pacific

In addition to the SMAPs, there are ongoing Site Investigations (SI) of 9 RAC-1 MMR [OE] Properties in Guam (2006-2007); SIs are scheduled to occur in CNMI in 2008. There have been USEPA technical assistance efforts for FUDS in CNMI (Tanapag Fuel Farm, Tanapag PCB Site, and KV-1 [fuel-contaminated well in the vicinity of the drinking water wells for Saipan] which is just beginning).

Training, paid for by USEPA through an IAG with USACE-SPD, in Munitions Awareness and Safety has been given to more than 500 attendees in Guam and Saipan (April, 2006). Brochures and signs have been prepared for public information on munitions awareness and safety.

With the encouragement of USEPA and other regulatory agencies, the USN is in the midst of performing a field assessment underwater for the Asan Beach OE site. Currently this phase is a voluntary activity.

OSC Assistance for Responses at FUDS Properties

It is prudent to ask whether or not a property may be contaminated with FUDS before going on site to perform invasive field work.

Contact Kathleen Shimmin to initiate the request for information on a potential FUDS, and she will consult with the USACE and FUDS documents to provide additional information.

Since the sites are not named in any consistent way, having the FUDS Inventory Number and longitude-latitude coordinates is most helpful in locating the information.

For recent responses at Golden Gate National Recreation Area and Petaluma Bombing Target (both FUDS properties in the San Francisco Bay Area), the FUDS points of contacts at USEPA and the USACE were able to provide useful information in what might be on the property and how to get DOD assistance in reviewing the site work plan, so that unexpected contact with OE was avoided.

Prepared for Oceania Regional Response Team meeting, April 24, 2007.

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