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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

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OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSEMEMORANDUMSUBJECT: The Department of Defense Installation  
Restoration ProgramFROM: Marcia E. Williams, Director *Marcia Williams*  
Office of Solid WasteTO: Waste Management Division Directors  
Regions I - X

This memorandum discusses RCRA permits at facilities owned or operated by the Department of Defense (DOD). DOD has developed the Installation Restoration Program (IRP) to identify and clean-up hazardous waste sites. Under the IRP, DOD prepares studies and generates data that can assist EPA in drafting RCRA permits.

The IRP is carried out in stages that are comparable to the stages of a cleanup required by RCRA. Phase I of the IRP is intended to identify waste sites and is comparable to a RCRA Facility Assessment. A Phase I report should identify most, if not all, of the solid waste management units at a DOD facility. Phase II of the IRP characterizes the nature and extent of contamination at a site or unit. Phase II usually provides site characterization information and monitoring data and is comparable to a RCRA Facility Investigation. Phase III of the IRP is an R&D phase that is used where a site cannot be controlled with proven technology or where a site is suitable for evaluating new technologies. Although the permitting process has no R&D stage, Phase III of the IRP can be helpful in identifying new or unique corrective measures. Phase IV of the IRP develops and implements a remedial action plan. Phase IV is comparable to identifying and implementing corrective measures under RCRA.

EPA has placed a high priority on RCRA compliance at Federal facilities. The work performed under the IRP will provide you with much of the information you need to prepare a permit, and I urge you to incorporate the IRP process into the permit development process. This means that you need to work with the DOD installation in reviewing the results of each phase of the IRP process and when necessary, expand the scope of the IRP to include all solid waste management units at the facility.

Please keep in mind that we are developing a rule that will recognize priorities for corrective action at Federal facilities. After we promulgate the rule we will incorporate a facility's priority into the schedule of compliance under §3004(u) of RCRA. Until we prepare a final rule, permits should recognize that DOD can not address releases from every solid waste management unit at every facility simultaneously.

In sum, I urge you to use the IRP process when you implement the RCRA corrective action authorities under §3004(u). Thank you for your attention to this matter.

cc: RCRA Branch Chiefs  
Regions I - X