






FORA's Role





This module reviews FORA's LUC implementation, management, operations and maintenance role as identified in LUCIP/OMP Section 5, highlighting FORA's coordination roles and responsibilities.



LUC O&M Responsibilities FORA's Role - Overview

- Munitions Recognition and Safety Training
 - Monitor MEC recognition and safety training implementation
 - Maintain MEC recognition and safety training materials & web site
- Construction Support
 - Monitor construction support implementation
 - Provide MEC find notification to Army, EPA & DTSC
 - MEC find assessments, including additional investigations or other actions necessary as a result of MEC finds
- Residential and Habitat Reserve Use Restrictions
 - Monitor compliance with Federal deed use restrictions
 - Ensure future deeds retain use restrictions
 - Annual LUC Monitoring and Reporting
 - Compile/submit Jurisdictions' annual LUC reports



FORA's Role Major Actions

- Annual and on-going LUC management requirements
 - Maintain training resources
 - Monitor implementation of LUC requirements
- MEC find assessment (MFA) role and responsibility
 - Report MEC finds
 - Conduct MEC find assessments
 - MEC find assessment reports
 - Additional investigations, as required by EPA and DTSC
- Annual Reporting
 - Compile Jurisdictions' annual LUC monitoring reports

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FORA LUCIP/OMP LUC Management

- Implementation
 - Develop/document procedures with Army, EPA, DTSC and jurisdictions
- Operations
 - Review residential use restriction compliance
 - Coordination with jurisdictions, owners, Army, EPA and DTSC
- Maintenance
 - Maintain MEC recognition and safety training
 - Notify jurisdictions, landowners, Army, EPA and DTSC of changes
- Monitoring
 - Monitor deeds, jurisdictions and landowners to ensure LUC conformity
 - Monitor jurisdictions' and owners' construction support implementation
- Inspection
 - Periodic ESCA property inspections to ensure conformity with LUCs
- Reporting
 - Reports to Army, EPA and DTSC
 - Provide Army, EPA and DTSC with reports on conformity / non-conformity
 - Provide Army, EPA and DTSC reports on changes to LUC requirements

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FORA LUCIP/OMP Long-term Management: Implementation

- Stewardship/O&M of post-site closure long term obligations:
 - Ensure LUC effectiveness through Corrective Actions
 - Avoid future noncompliance through necessary changes
- Develop Army, EPA and DTSC notification procedures and documents to Report:
 - Property-Use MEC-related data
 - Failure to comply with LUCIP/OMP
 - LUCIP/OMP inconsistencies, causes and education
 - Failure to provide notification Sixty (60) day prior to property conveyance
- Develop procedures and documents for jurisdictions and landowners to:
 - Communicate, coordinate and track additional response actions
 - Receive/transmit 60 day property conveyance notice to others
- Develop procedures and documents for jurisdictions and landowners to:
 - Comply with LUC monitoring and reporting obligations
 - Cease development when suspected MEC item found - remedy not protective.
 - Notify jurisdiction/owner when able to recommence development
- Develop procedures and documents for FORA to:
 - Notify the jurisdictions/property owners of LUC responsibilities
 - Identify/report LUCIP/OMP inconsistency causes, evaluate and implement, adjust/modifications to avoid noncompliance
 - Contract EPA and DTSC required additional response actions with qualified UXO consultant

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FORA LUCIP/OMP Long-term Management: Operations

- Provide/educate jurisdictions, land owners and qualified UXO contractors:
 - Annual land use control monitoring and reporting procedures and documents
 - LUCIP/OMP violations and departures notifications
- Provide jurisdictions and owners with additional response/remedy modification information:
 - Planned property conveyance notifications
 - LUC enforcement
 - Ensure they fulfill their LUC operations and maintenance obligations
- Inform Army, EPA and DTSC on jurisdictions and landowners performance failures
 - Annual land use control monitoring and reporting
 - LUCIP/OMP notifications
 - Additional response/remedy conveyance
 - Notice of planned property conveyance
 - LUC enforcement
- Take action to:
 - Implement/enforce remedy modifications
 - Implement/conduct further response actions – if required under AOC and ESCA
- For additional response actions and remedial actions assist Jurisdictions and landowners to:
 - Process Explanations of Significant Difference (ESD) public outreach and documentation
 - Process ROD amendments public outreach and documentation
 - Provide for ESD and ROD Amendments
- Alert jurisdictions and landowners of long-term obligations

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FORA LUCIP/OMP Long-term Management: Maintenance

- Update and notify jurisdictions, land owners, Army, EPA and DTSC of changes to:
 - Requirements for jurisdictions' and landowners' failure to perform LUC monitoring and reporting
 - LUCIP/OMP ineffectiveness notifications
 - Additional response/remedy modifications
 - Notices of planned property conveyance
 - LUC enforcement
 - Implement/enforce LUC non-compliance corrective actions

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FORA LUCIP/OMP Long-term Management: Monitoring

- Monitor deeds, jurisdictions and landowners to ensure requirement compliance for:
 - Annual land monitoring and reporting
 - LUCIP/OMP ineffectiveness notifications
 - Additional response/remedy modifications
 - Notice of planned property conveyance
 - LUC enforcement
 - Activities inconsistent with LUC Remedy objectives
 - Monitor LUC non-compliance corrective actions

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FORA LUCIP/OMP Long-term Management: Inspection

- Periodic ESCA property inspection confirming requirement compliance for:
 - Ground disturbing activities
 - Changes in land use
 - Changes in site conditions
 - Ownership/occupancy changes
 - MEC finds
 - LUC maintenance
 - LUCIP/OMP ineffectiveness
 - Additional response/ remedy modification
 - Notice of planned property conveyance
 - LUC enforcement

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FORA LUCIP/OMP Long-term Management: Reporting

- Reports on failures of jurisdictions and land owners to perform:
 - Annual LUC monitoring and reporting
 - LUCIP/OMP ineffectiveness notifications
 - Additional response/remedy notifications
 - Notice of planned property conveyance
 - LUC enforcement
- Provide Army, EPA and DTSC with reports on:
 - MEC related data identified during property use
 - Activities inconsistent with LUCIP/OMP remedy objectives
 - Changes made to comply with LUCs
 - Upcoming property transfers
 - LUC inconsistencies, LUC noncompliance, LUC noncompliance corrective actions
 - Proposed additional response actions and remedy modifications
 - LUC remedy objective inconsistency cause evaluation and proposals to eliminate inconsistencies
- Additional Response Actions and Remedial Objectives:
 - ESD documentation, Record of decision / amendment documentation
- Provide jurisdictions and owners reports supporting:
 - Notices of noncompliance with LUCs
- Army, EPA and DTSC review and LUC compliance measures approval:
 - Notice to cease development activities for non-compliance

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FORA MEC Find Assessments (MFAs)

- Implementation:
 - Develop standard format and procedures for MFAs
- Operations:
 - Update procedures for MFAs
 - Perform and coordinate MFAs
 - Educate jurisdictions and landowners on MFAs
- Maintenance:
 - Maintain files
 - Educate jurisdictions
- Monitoring and Inspection:
 - Perform MFAs – with Landowner’s UXO Contractor support
 - Monitor implementation of MFA process
- Reporting:
 - Provide Army, EPA and DTSC with landowner MEC-find reports
 - Develop/submit MFA Report to Army, EPA and DTSC
 - Report Army, EPA and DTSC MFA concurrence/non-concurrence

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FORA’s Role

Questions?

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