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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

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Ref: 8EPR-PS

MEMORANDUM

SUBJECT:

Region 8 Green Remediation Policy

FROM:

Carol L. Campbell, Assistant Regional Administrator Carl & Campbell

Office of Ecosystems Protection and Remediation

TO:

Superfund Program Directors

Background

Region 8 has taken significant steps to reduce the impact of its operations on the environment. Our new building serves as an excellent example of a project that incorporates energy efficiency, storm water management, renewable materials, renewable energy and materials with recycled content. Through this memorandum, I'm requiring all Program Directors and Unit Chiefs implementing Superfund, Emergency Response and Brownfield programs to examine and implement, where possible, actions to reduce environmental impacts associated with Region 8 Superfund and Brownfield assessment and cleanup activities.

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Policy

The National Contingency Plan puts forth criteria to be used in the selection of remedies at Superfund and Emergency Response sites. Once response decisions have been made and documented in Records of Decision (RODs) and Action Memorandums, Region 8 Remedial Project Managers and On-Scene Coordinators will evaluate the environmental impacts of planned cleanup actions and attempt to minimize those impacts to the extent possible. Similarly, we will attempt to evaluate and minimize the environmental impacts of our assessment activities at Brownfield sites.

At a minimum, our efforts to reduce the environmental impacts of cleanup and assessment work in the Superfund, Emergency Response and Brownfield programs will consist of implementing anti-idling plans for construction equipment to the maximum extent practicable. In addition, project managers will be required to report on the energy consumed at our cleanup projects on an annual basis. We will use these data to calculate the carbon footprints associated with our projects, and will develop a baseline for future efforts.

Implementation

While timing and financial considerations may preclude the use of "green practices" on some of our projects (e.g. time-critical removals where mobilization must occur rapidly), the cost of technologies such as wind and solar continues to come down, and more incentives are being offered by utilities as well as Federal, State and local governments. Staff should consider the lifecycle costs

associated with environmentally friendly technologies in addition to the environmental benefits such as the reduction in greenhouse gasses. Examples of environmentally friendly technologies/approaches that could be applied in Region 8 include:

- Recovering landfill gas for energy production.
- Installing solar panels on old landfills (recently done at Ft Carson)
- Using solar panels, wind turbines or small hydro plants to power on-site treatment systems (this can greatly reduce the cost of long-term O&M)
- Retrofitting diesel-powered construction equipment with particulate traps.
- Using alternative fuels to power construction equipment.
- Purchasing construction materials that have environmentally friendly attributes such as:
 - Recycled content
 - Certified wood
 - o Rapidly renewable materials (wheatboard)
- Reuse and recycle construction and demolition (C&D) materials.
- Use of non-potable water for dust suppression.
- Use concrete made with coal combustion products (CCPs), such as fly ash, to replace a portion of traditional Portland cement.

Assistance

We have in-house expertise in the area of environmentally friendly cleanup. In addition, Region 8 currently has an Interagency Agreement with the National Renewable Energy Lab (NREL) to provide technical assistance for determining the feasibility of incorporating renewable energy systems in our Brownfields, Superfund Remedial and Emergency Response actions.

Furthermore, EPA HQ, and organizations such as Association of State and Territorial Solid Waste Management Officials (ASTSWMO) are developing the following resources to assist RPMs and OSCs:

- Fact sheets on Best Management Practices
- Decision Matrices
- Environmental Impact Assessment tools
- Model contract language

Looking to the future

This policy will be reviewed at the end of every calendar year and updated as necessary based on new information, laws or national policies, and lessons learned.