




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

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MEMORANDUM

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

SUBJECT: Encouraging Greener Cleanup Practices through Use of ASTM International's Standard Guide for Greener Cleanups

FROM: Mathy Stanislaus
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TO: Regional Administrators, I-X
OSWER Office Directors

As part of EPA's ongoing efforts to support greener cleanups, EPA participated in the standards development process for ASTM International's *Standard Guide for Greener Cleanups E2893-13* (Guide). On November 25, 2013, ASTM International released this voluntary Guide. The purpose of the Guide is to foster greener cleanups at contaminated sites by describing a process for evaluating, implementing, documenting, and reporting activities to reduce the environmental footprint of cleanups while working within the applicable regulatory framework and satisfying all legal requirements.¹ Consideration of greener cleanup practices directly builds upon several of the Administrator's seven key themes for the future, including: making a visible difference in communities across the country; addressing climate change and improving air quality; and working toward a sustainable future.² Therefore, in your continued efforts to advance greener cleanup practices, I encourage you to consider ASTM's Standard Guide for Greener Cleanups as an available resource for reducing the environmental footprint of cleanups and furthering the Administrator's themes.

Cleaning up contaminated sites improves environmental and public health conditions. Cleanup activities, however, use energy, water, and materials resources, creating their own environmental footprints. In light of this, OSWER issued the *Principles for Greener Cleanups* (Principles)³ to serve as the foundation for EPA's greener cleanup policy. Among other things, the Principles establish a policy goal to evaluate cleanup actions comprehensively for the purpose of ensuring protection of human health and the environment and reducing the environmental footprint of cleanup activities, to the maximum extent possible. The Principles are not intended to allow cleanups that do not satisfy threshold requirements for protectiveness, or do not meet other site specific cleanup objectives, to be considered green. They are not intended to trade cleanup program objectives for other environmental objectives. The Principles also outline a framework

¹ The Guide does not affect or supersede existing regulations and guidance issued pursuant to federal cleanup statutes, including for example, the CERCLA remedy selection process provided for in the National Contingency Plan (40 CFR part 300) and associated EPA Superfund guidance.

² <http://www2.epa.gov/aboutepa/epas-themes-meeting-challenge-ahead>

³ For more information on the Principles, see <http://www.epa.gov/oswer/greenercleanups/principles.html> (August 27, 2009).

to evaluate and document the environmental footprint of site assessment and cleanup activities, recommending the consideration of the following five core elements:

- Minimize total energy use and maximize renewable energy use;
- Minimize air pollutants and greenhouse gas emissions;
- Minimize water use and impacts to water resources;
- Reduce, reuse, and recycle material and waste; and
- Protect land and ecosystems.

Since the Principles were issued, all EPA regions have created their own region-specific policies to further integrate the consideration of greener cleanup practices and new regional policies should be consistent with the Principles.⁴ In addition, OSWER's cleanup programs have developed tools, resources, and other strategic documents to meet the same objective. For example, www.clu-in.org/greenremediation has become the "go-to" website for technical information on greener cleanups with fact sheets, case studies, and other tools, such as the Spreadsheets for Environmental Footprint Analysis (SEFA).

In conjunction with the above-mentioned efforts, EPA staff also participated in ASTM's consensus-based development process for the *Standard Guide for Greener Cleanups* because the Agency viewed the Guide as an opportunity to foster greener cleanup practices in a manner consistent with the Principles. The Agency's role throughout this process was to communicate EPA's cleanup program policy goals and objectives to ASTM's stakeholder task group. EPA was particularly interested in, and succeeded at, incorporating key elements from the Principles into the Guide. For example, the Guide states that it should not be used as a justification to avoid, minimize, or delay implementation of specific cleanup activities or as a justification for selecting cleanup activities that compromise stakeholder interests or goals for a site.

The outcome of this consensus process is a document that is not prescriptive and does not recommend a specific course of action for all sites, but rather a tool that, when implemented appropriately, can reduce the environmental footprint of cleanup activities while still meeting site-specific regulatory requirements and objectives. The Guide includes the following features:

- a systematic protocol to identify, prioritize, select, implement, and report on the use of best management practices to reduce the environmental footprint of cleanup activities;
- a list of greener cleanup best management practices;
- guidelines to quantify the environmental footprint of cleanup activities; and
- a reporting structure to promote public availability of information relating to the decision-making process and communication of outcomes across the five core elements.

In line with the Agency's pursuit of a cleaner, safer environment, I recommend that regions and OSWER programs facilitate and encourage use of ASTM's *Standard Guide for Greener Cleanups* in your efforts to implement greener cleanup practices.

⁴ For more information on regional policies, see <http://www.clu-in.org/greenremediation/regions/index.cfm>.

For general information on greener cleanups, please visit www.epa.gov/oswer/greenercleanups or reach out to the program office contacts listed on the site.

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