



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION EUROPE, AFRICA, CENTRAL  
PSC 817 BOX 108  
FPO AE 09622-0108

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**From:** Commander, Navy Region Europe, Africa, Central  
**To:** Commanding General, U.S. Army Installation Management Command Directorate Europe  
Commander, U.S. Air Forces in Europe–Air Forces Africa  
Commander, U.S. European Command, Strategic Logistics Division (ECJ4-EN)  
Director, Defense Logistics Agency Installation Support Europe & Africa

**Subj:** LEAD ENVIRONMENTAL COMPONENT GUIDANCE ON REMEDIATION  
CONDUCTED AT DEPARTMENT OF DEFENSE INSTALLATIONS IN ITALY

**Ref:** (a) DoD Instruction 4715.08, 1 Nov 13 Incorporating Change 2, of 31 Aug 18  
(b) DoN LEC Delegations for Installations outside the United States, of 4 Jun 14  
(c) CNREURAFSWA Lead Environmental Component Guidance on Remediation  
Conducted at Department of Defense Installations in Italy, of 22 Jan 19  
(d) Italy Final Governing Standards (FGS), dated 7 Sep 12, Revision 2, of Jun 15  
(e) DoD Instruction 4715.05, 1 Nov 13 Incorporating Change 1, of 5 Oct 17

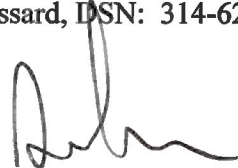
**Encl:** (1) Lead Environmental Component Guidance for Remediation Processes within Italy

1. Reference (a) provides Department of Defense (DoD) policy and assigned responsibilities and procedures for remediation of environmental contamination on DoD installations outside the United States. Reference (b) identified Commander, Navy Region Europe, Africa, Central (CNREURAFCENT) as the Lead Environmental Component (LEC) for Italy. Per reference (a), EURAFCENT, as the DoD LEC for Italy, provides country-specific guidance for remediation activities within the host nation of Italy as necessary.

2. This guidance reissues reference (c) to primarily change the term “preliminary assessment”, to “initial assessment.” It is applicable to all DoD installations located within the host nation of Italy as it applies to the remediation process of contamination or potential contamination at DoD sites in Italy. This guidance also applies to follow-on requirements, if needed, after the completion of response and initial cleanup of spills accomplished under reference (d), as established under reference (e).

3. Enclosure (1) provides guidance regarding the procedures of this matter. This guidance is effective immediately.

4. Point of contact for this matter is Mr. James Lessard, DSN: 314-626-3556, or via email at [james.lessard@eu.navy.mil](mailto:james.lessard@eu.navy.mil).



S. T. MULVEHILL  
Chief of Staff

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CNE-CNA

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Date: 19 Dec 2019

Subject: **LEC Guidance for Remediation Processes within Italy**

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1. **Objective:** To provide country-specific guidance for Department of Defense (DoD) Component Heads for conducting environmental remediation activities within the host nation of Italy.
2. **References:**
  - a. DoDI 4715.05 "Environmental Compliance at Installations Outside the United States", dated 01 Nov 2013, Incorporating Change 1, 5 Oct 2017
  - b. DON LEC Delegations for Installations outside the United States, dated 4 Jun, 2014
  - c. DoDI 4715.08 "Remediation of Environmental Contamination Outside the United States, dated 01 Nov 2013, Incorporating Change 2, 31 Aug 2018"
  - d. Italy Final Governing Standards (FGS) dated 7 Sep 2012, Revision 2, June 2015
3. **Executive Summary:** The Secretary of the Navy was assigned "Lead Environmental Component (LEC)" for the country of Italy in accordance with (IAW) reference (a). This responsibility was further delegated to the CNIC EURAFSWA (now COMNAVREG EURAFCENT) as stated in reference (b), who, as the DoD LEC in Italy, is responsible for providing, as necessary, country-specific DoD guidance for remediation activities within Italy IAW reference (c). This document provides Italy specific guidance for all US forces conducting remediation activities within Italy through a five phase process.
4. **Five Phase Remediation Process:**
  - a. **Phase I – Identify and Report the Potentially Contaminated Site**
    - (1) **Identifying potential remediation following completion of Spill Response Procedures (SRPs).** In the event of a hazardous substance and/or POL (petroleum, oil, and lubricant) spill caused by DoD activities located on a DoD installation in Italy, notify the LEC (and the Italian Base Commander (IBC) as required per installation processes and requirements). SRPs, requirements and activities are described in Chapter 18 in reference (d). These are summarized below:
      - (a) SRPs include the removal of any remaining free product and/or obviously contaminated soils at the spill site. The goal during the immediate response and clean up procedures is to ensure that the initial investigation described in reference (d) demonstrates the levels of potential contaminants of concern are lower than those listed in Table 18.1 of reference (d). Normally, SRP alleviates the need for follow-on environmental remediation procedures in reference (c), by getting to site closure at the earliest stage possible.
      - (b) Upon completion of SRP, the installation expeditiously determines if the SRPs were able to achieve the above mentioned goal. If the Installation determines the levels of residual

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Enclosure (1)



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contamination originating from the spill are higher than those listed in Table 18.1 of reference (d), then Installation must conduct an Initial Assessment (IA) IAW paragraph 4.b below.

**(2) Discovery of Potential Contamination.** For the purpose of this guidance document, “discovery” of potential contamination can occur on a DoD installation during excavation activity associated with construction, repair projects, or other land disturbing activities. The process is listed below:

(a) Upon discovery of potential contamination, the Installation shall work expeditiously to determine the extent and significance of discovered potential contamination. If the Installation determines that sampling is required to determine whether the discovered potential contamination has a reasonably likelihood to pose a substantial impact to human health and safety (SIHHS), the installation shall conduct an IA as described in paragraph 4.b below.

(b) Military Construction Projects (MILCON): A DoD Component funds remediation of environmental contamination necessary to undertake an approved MILCON project from the MILCON appropriation, and limits such remediation to that necessary to complete the MILCON project. If there is a need for remediation of environmental contamination beyond that required by the MILCON project, reference (c) applies, and the Installation must conduct an IA as described in paragraph 4.b below.

(c) Remediation actions at DoD installations being returned to Italy or remediation actions under an international agreement are governed by reference (c).

### **b. Phase II – Conduct the Initial Assessment (IA)**

(1) The IA is used as an initial screening process to determine if the potential contamination has a SIHHS. The IA shall ascertain whether the concentrations of the contaminants of concern exceed generally established, published, and applied federal standards in the United States. These standards are found in the U.S. Environmental Protection Agency Regional Screening Levels tables. Use Table 18.1 in reference (d) when it is more protective of human health and safety.

(2) Installations must notify the LEC and IBC that an IA is being performed to determine if the site has a reasonable likelihood to pose a SIHHS. Installations shall make clear to the IBC that this information is for situational awareness purposes.

(3) If the results of the IA indicate that the site does not have a reasonable likelihood to pose a SIHHS (e.g., the test results do not exceed the screening levels discussed in item 4.b.(1) above; medical authority determines there is no reasonable likelihood the site poses a SIHHS), the Installation shall:

(a) Inform the IBC in writing of the IA results and the intent to close the site from further investigation.

(b) Maintain IA records.

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- (c) Forward a copy of the IA records, results and IBC correspondence to the LEC.
- (4) If the results of the IA indicate that the site has a reasonable likelihood to pose a SIHHS, the Installation shall:
  - (a) Inform the LEC and IBC in writing of the IA results and the intent to proceed with a site-specific investigation to determine whether the site actually poses a SIHHS, including a brief outline of the planned investigation process required in paragraph 4.c. below.
  - (b) Properly/adequately secure the site.
  - (c) Conduct the SIHHS investigation IAW 4.(c) below.

**c. Phase III – Conduct a SIHHS Investigation**

- (1) A SIHHS investigation is required if the IA determined there is a reasonable likelihood a SIHHS exists at the site. Investigations will be conducted IAW reference (c) and this guidance.
- (2) The investigation process will include a health impact assessment (HIA; a.k.a., human health risk assessment) with reference to a level of exposure that is occurring, or is about to occur, within the next 3 to 5 years at the site.
  - (a) Substantial impact is defined as a level of exposure that is occurring, or is about to occur within the next 3 to 5 years, and exceeds a generally established, published, and applied federal standard in the United States. However, the wording “3 to 5 years” is referred to when the exposure may start occurring, if not already occurring, rather than to the length/duration of such exposure. The length/duration of the exposure to potential contaminants considered for HIA purposes is normally much longer, based on “generally established, published, and applied federal standard in the United States.”
  - (b) The HIA must include a written determination as to whether or not the site poses a SIHHS.
- (3) The HIA must be forwarded, along with its supporting documentation, to the appropriate DoD Medical Authority (MA), and the LEC, in turn, for written coordination prior to forwarding to the responsible In-Theater Component Commander (ITCC) for action.
- (4) The responsible ITCC will make a written determination that environmental contamination poses or does not pose a SIHHS after reviewing the HIA decision, supporting documentation, and coordinating comments from the MA and LEC.
- (5) ITCC’s written determination must be immediately forwarded to the LEC and IBC.

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**d. Phase IV – Remediation**

(1) When the ITCC determines that a SIHHS exists at a site and remedial actions are necessary, consultation with the LEC shall occur as follows:

(a) The Component prepares a Decision Document (DD) with recommended course of action and submits to LEC via official correspondence for review and concurrence.

(b) The LEC will complete the review and make a final determination within 45 days of receipt, ensuring adequate time to consult with the component to obtain additional clarifications and/or documentation, and ensure compliance with current DoD policy.

(c) The Component may appeal the LEC final determination to USEUCOM for resolution.

(2) The DoD Component should seek host-nation or third-country contribution, including assistance in kind, for remediation of environmental contamination funded by the United States.

(3) Upon completion of the remediation activities ensuring there is no longer a SIHHS, the ITCC will provide to the LEC and USEUCOM/CC a report detailing the extent of actions, any follow-on monitoring and analysis, the cost of the remediation, and any negotiated conditions IAW reference (c).

**e. Phase V – Actions if Italian Authorities Disagree with DoD Actions**

During the process of determining if a site poses SIHHS, Italian authorities (i.e., IBC, IDGS, Italian government or regulatory agencies) may not agree with decisions made by the United States, due to a variety of reasons, to include different interpretations of legal requirements or funding limitations. Potential areas of disagreement include whether there is a reasonable likelihood of SIHHS after an IA, whether there is a disagreement with the ITCC's decision, or whether the remediation action is complete. If this occurs:

(1) The installation immediately notifies the LEC of the disagreement with the action and forwards all relevant documentation to the LEC.

(2) LEC forwards the documentation to the United States Sending State Office for resolution with the Italian Defense General Staff and/or Government of Italy.

The LEC is committed to being a good steward of our environment and working together with the host-nation to find solutions in the area of remediation.

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