



Highlights of [GAO-10-46](#), a report to the Committee on Armed Services, House of Representatives

## Why GAO Did This Study

The Department of Defense (DOD) estimates that cleaning up known hazards at the over 4,700 formerly used defense sites (FUDS)—sites transferred to other owners before October 1986—will require more than 50 years and cost about \$18 billion. This estimate excludes any additional needed cleanup of emerging contaminants—generally, those not yet governed by a health standard. DOD delegated FUDS cleanup responsibility to the U.S. Army Corps of Engineers (Corps).

In addition to FUDS, DOD is responsible for cleaning up about 21,500 sites on active bases and 5,400 sites on realigned or closed bases. The House Armed Services Committee directed GAO to examine (1) the extent to which the Corps reevaluates sites to identify emerging contaminants; (2) how DOD allocates cleanup funds; (3) how the Corps prioritizes FUDS for cleanup; and (4) FUDS program overhead costs. GAO analyzed nationwide FUDS property and project data; policies, guidance and budget documents; and interviewed DOD and Corps officials.

## What GAO Recommends

GAO recommends that the Corps conduct 5-year reviews for sites with emerging contaminants and is making recommendations for better management of these reviews. DOD generally agreed with the recommendations, but did not agree to conduct reviews not specifically required by law. We continue to believe additional reviews are needed, consistent with EPA guidance.

View [GAO-10-46](#) or key components. For more information, contact John B. Stephenson at (202) 512-3841 or [stephensonj@gao.gov](mailto:stephensonj@gao.gov).

## FORMERLY USED DEFENSE SITES

### The U.S. Army Corps of Engineers Needs to Improve Its Process for Reviewing Completed Cleanup Remedies to Ensure Continued Protection

## What GAO Found

The Corps has not often re-examined sites after they have been cleaned up to determine whether emerging contaminants are present or need to be addressed. Generally, the Corps reevaluates sites only when requested by states or others, or when reviewing the completed remedy to ensure its continuing protectiveness. Such reviews are required every 5 years for sites where the chosen remedy does not allow for unlimited use and unrestricted exposure. Corps officials said that they had not received many requests to re-examine sites and few FUDS had required 5-year reviews. Reports on the 15 5-year reviews completed as of May 2009 within four Corps divisions indicated that the Corps has not consistently (1) conducted required 5-year reviews on time, (2) conducted reviews when they are not required but may be appropriate, as EPA recommends, and (3) submitted reports on these reviews for technical evaluation, as required by Corps policy. Also, DOD and the Corps lack accurate, complete information on the status of these reviews. Without timely, accurate, and complete reviews, the Corps cannot ensure that remedies continue to protect human health and the environment.

DOD proposes funding to clean up defense sites based on the department's environmental restoration goals and obligations are generally proportional to the number of sites in each site category. Funding is directed toward reducing risks to human health and the environment, among other goals. The Army, Navy, Marine Corps, Air Force, and Defense Logistics Agency each determine the funding requirements to clean up sites based on these goals.

The Corps prioritizes individual FUDS for cleanup on the basis of risk and other factors. The Corps assigns each site a risk level, considering such factors as the presence of hazards, the potential for human contact, and the concentrations of contaminants and their potential for migrating, among others. According to DOD officials, sites' risk levels are the single most important criterion in determining cleanup priorities. However, the Corps also takes into account specific FUDS program goals, and other factors—such as regulators' and the public's concerns—that can influence the Corps' decisions about which sites to address first. Consequently, high risk sites are not always addressed before low risk sites.

Direct program management and support costs for the FUDS program have decreased slightly in recent years, mostly due to structural changes in the program. The Corps' obligations for FUDS direct program management and support costs have declined from 11.0 percent of total program obligations in fiscal year 2004 to 9.0 percent in fiscal year 2008. In addition, to further reduce certain components of these costs to make more funds available for FUDS cleanup, the Corps reduced the number of employees managing the program and the number of districts responsible for FUDS from 22 to 14. Furthermore, Corps officials told GAO that they have implemented a number of controls—such as assigning tracking codes—to ensure that program management and support funds are spent only on approved items.