

Request

## Congress of the United States

Washington, DC 20515

GAO

Herndon  
Walker

January 18, 2001

01-0308

The Honorable David M. Walker  
Comptroller General  
U.S. General Accounting Office  
441 G Street N.W.  
Washington, D.C. 20548

Dear Mr. Walker:

We are writing to request a General Accounting Office (GAO) audit to determine how the Department of Defense (DOD) identifies areas of environmental contamination and how the DOD records and manages such data.

For almost 60 years, there has been a significant military presence on Guam. In 1945, within one year of the U.S. liberation of Guam, 21 separate military installations were built and over 200,000 personnel were present. This was an island with 20,000 civilians and a total land area of 208 square miles. This legacy of military activities has resulted in a variety of environmental cleanup issues. For example, there are 48 Formerly Used Defense Sites (FUDS), several Base Realignment and Closure (BRAC) sites, and a National Priorities List (NPL) site at Andersen Air Force Base requiring cleanup. However, we believe there may be additional areas that have not been identified. Recently, chemical weapons testing kits containing measurable quantities of mustard gas and other toxic chemicals and munitions were found at 2 previously unknown locations on Guam.

The discovery of buried mustard gas in the village of Mongmong by a private citizen on private property in early 1999 led to an evacuation of the area and has raised island-wide concerns. Shortly after the Mongmong discovery, outcries for an island-wide assessment of FUDS was demanded by the public. Moreover, local researchers believe there are other possible areas but have been hampered by a lack of DOD records. A recent study conducted by the Agency for Toxic Substances and Defense Registry on environmental contamination in the Agana Swamp recommended a thorough archival search by the U.S. Army Corp of Engineers, DOD, the Environmental Protection Agency, and Guam EPA to determine the final disposition of any chemical weaponry brought to Guam during World War II and thereafter.

The Honorable David M. Walker  
January 18, 2001  
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In this context, we are concerned about how thoroughly DOD is able to identify areas of environmental contamination that require cleanup not only to Guam but also across the United States.

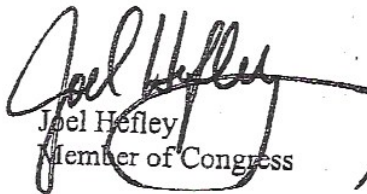
As such, we would like to request a GAO audit to determine: (1) how DOD goes about identifying areas of environmental contamination that may require cleanup, including what data is available, (2) does DOD use local knowledge to identify sites when records are not available, (3) what is being done to prevent this situation from occurring in the future through requirements for better records management and retention, and (4) what safeguards can DOD undertake to ensure better record management and retention?

As part of this study, we would ask that you use Guam as one of your case studies. Thank you for your review and consideration of this request. Should you wish to discuss this effort further, please contact Mr. Marc Smith of Congressman Underwood's office at (202) 225-1188.

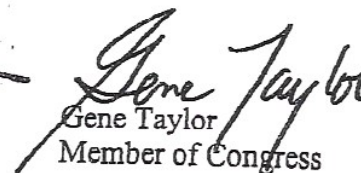
Sincerely,



Robert A. Underwood  
Member of Congress



Joel Hefley  
Member of Congress



Gene Taylor  
Member of Congress

*Reply to request.*

G A O

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United States General Accounting Office  
Washington, DC 20548

June 8, 2001

Congressional Requesters

Subject: DOD Identification of Environmental Contamination Sites

Concerning your letter to the Comptroller General requesting a GAO study of how the Department of Defense (DOD) identifies environmental contamination areas at active and formerly used defense sites, we talked with your staffs to gain a further understanding of your needs. Your staffs agreed that all coordination on this assignment should be through Marc Smith of Delegate Underwood's staff. Please see enclosure I for the list of requesters with whom we will coordinate through Mr. Smith.

Due to the complexity of the issue and uncertainty of data availability, we need to proceed with a separate design phase. The purpose of this letter is to set forth the study objectives and provide you with a completion date for the design phase. We agreed that the overall objectives of our work will be to determine (1) DOD's process for identifying environmental contamination sites and the extent to which the process is followed and (2) the extent to which DOD has recorded and managed data on environmental contamination to ensure that information is available for future use.

The design phase will be completed by September 28, 2001. We will remain in contact with your staff, and at the end of the design phase, we will provide you with a projected completion date for the total study. If you should have questions, you may contact me on (202) 512-3841 or my Assistant Director, William Swick on (206) 287-4851.

Sincerely yours,

(Ms.) Gary L. Jones  
Director, Natural Resources  
and Environment

Enclosure



DOD Not to be sent to  
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GAO

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United States General Accounting Office  
Washington, DC 20548

May 23, 2001

The Honorable Donald H. Rumsfeld  
The Secretary of Defense

Attention: DOD Office of Inspector General  
Technical Director for Audit Followup and GAO Affairs

Dear Mr. Secretary:

Congressmen Robert A. Underwood, Joel Hefley, and Gene Taylor have requested that the General Accounting Office (1) evaluate DOD's process for identifying areas of environmental contamination and (2) determine how DOD records and manages data relevant to environmental contamination sites. The Congressmen are concerned about these issues at DOD locations throughout the United States and its territories and possessions, but they are particularly interested in Guam. Guam has 48 formerly used defense sites, 2 base realignment and closure sites, and 1 national priority listing site at Andersen Air Force Base, and the Congressmen are concerned that there may be additional contamination areas that have not been identified by DOD.

To address this request, we will obtain information from DOD and its agencies, including the Corps of Engineers, on the policies, procedures, and activities used to identify and document areas of environmental contamination. Our Natural Resources and Environment team in Washington, D. C. and our Seattle field office will conduct the work under Job Code 360092. The design phase of the assignment will begin on or about May 29, 2001, and we would like to have an entrance conference with all relevant DOD agencies during the week of June 11, if possible. Our work at DOD and Corps headquarters will be supplemented by field visits to DOD facilities and offices on Guam and the Hawaiian Islands and at other locations yet to be selected. We will advise your office in advance of any field site visits. If you have any questions, please contact William R. Swick, Assistant Director, on (206) 287-4851, or Byron S. Galloway, Analyst-in-Charge, on (202) 512-7247.

Sincerely yours,

Henry L. Hinton, Jr., Managing Director  
Defense Capabilities and Management

### GAO Discussion issues or Topics

GAO need the following information regarding Department of Defense (DOD) environmental contamination cleanup efforts on active installations, base realignment and closure (BRAC) installations, and formerly used defense sites (FUDS) on Guam. To the extent possible GAO need documentation supporting responses to these topics.

1. Background on environmental cleanup efforts on Guam.
  - A. When and why did cleanup efforts begin, e.g., the FUDS program began in 1985 as part of the Army installation restoration program, cleanup of active installations began in 19XX as a result of the Resource Conservation and Recovery Act of 1976, and BRAC clean up began at the Naval Air Station in Agana in 19XX after the 1993 round of base closures?
  - B. What is considered contamination for efforts on active installations, BRAC installations, and FUDS, e.g., hazardous, toxic, and radioactive waste (HTRW); ordinance and explosives (OE); containerized HTRW; building demolition and debris removal; potentially responsible party actions; etc.?
  - C. What were the requirements for storage and disposal of contaminants before the DOD cleanup efforts began at active and BRAC installations and FUDS?
  - D. What are the current requirements for storage, disposal, and cleanup of contaminants at active and BRAC installations in Guam?
  - E. How are other entities involved with DOD's cleanup efforts on Guam, e.g., U.S. EPA, Guam Environmental Protection Agency, academicians, environmental groups, restoration advisory groups, others?
2. What process does DOD have to identify potential environmental contamination sites (contaminated areas on active and BRAC installations and on FUDS properties) and to what extent is it followed? Specifically, GAO want to document showing how potential sites have been/are identified. Given the tight timeframe for the visit, GAO would like any relevant administrative files or other documents available at the DOD locations GAO visit, i.e., at the major command offices in Honolulu or installations in Guam. This is especially important if any records are in storage.
  - A. What are the legislative, regulatory, and DOD requirements to identify potential sites?
  - B. When was the initial inventory of potential sites developed?
  - C. What procedures were used to develop the inventory, e.g., search of real estate records, search of archived records, interviews with employees, etc.? Also, was there guidance and/or a check list of steps to be taken to identify such sites?
  - D. How are potential sites added to the inventory?
  - E. What internal controls exist to ensure that potential sites brought to DOD's attention by private citizens or through other means are added to the inventory?
  - F. What assurances are there that all contaminated sites have been identified?

3. To what extent has DOD recorded and managed data on environmental contamination sites to ensure that information is available for future use?
  - A. What are the legislative, regulatory, and DOD requirements for gathering and managing information about contaminated sites at active and BRAC installations and FUDS on Guam?
  - B. What information is available on contaminated sites?
    - i. What information is kept in the administrative file for each site?
    - ii. What information is automated and how is it managed? For example, who inputs data into NORM, how is the data verified, where is the supporting data, how long is it retained, etc.?
    - iii. Can sites be tracked back to their source, i.e., is there information in the hard or automated file that shows when and how potential sites were identified?
  - C. Is the information available on contaminated sites on active and BRAC installations sufficient to ensure that all contaminated areas have been identified and/or cleaned up before property is transferred to a third party?



Draft (8-17-01)

**AGENDA  
GAO Audit  
Friday, September 7, 2001**

0800-0850	Jesus Salas, Administrator (confirmed) Guam Environmental Protection Agency Tele: (671) 475-1620 Fax: (671) 477-9402  Lance Richman, Tele: (671) 477-2797 <a href="mailto:lrchman@kuentos.guam.net">lrchman@kuentos.guam.net</a> Walter Leon-Guerrero Tele: (671) 475-1644 <a href="mailto:walterlg@mail.gov.gu">walterlg@mail.gov.gu</a>
0900-1000	John Gerber (confirmed) Pacific War Museum Foundation Tele: (671) 477-8355, Fax: (671) 472-6070 451 Gogue Dr. - Ordot
1030-1130	Victor April & Alejandro Lizama (confirmed) Historic Resources Division Department of Parks and Recreation Tele: (671) 475-6290 Fax: (671) 477-2822
1330-1530	Dr. Hiro Kurashina, et. al. (confirmed) The Richard F. Taitano Micronesian Area Research Center University of Guam Tele: (671) 735-2150, Fax: (671) 734-7403 <a href="mailto:kurashin@uog9.uog.edu">kurashin@uog9.uog.edu</a>
?	James (Jim) Canto (tentative) PCR Environmental Inc. Tele: (671) 646-3560, Fax: (671) 646-3563 <a href="mailto:info@pcrguam.com">info@pcrguam.com</a>

**Tuesday, September 4, 2001**

Evening	Mr. Fred Castro and Ms. Grace Garces (tentative) BRAC III & IV and Andersen AFB RAB Community Co-Chairs
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## United States General Accounting Office

## Fax Transmittal Sheet



To: (Name and Address) L. Bettis - Guam Governor's Office

Telephone No. (671) 475-9202

Fax Telephone No. (671) 472-7549

Date 8/20/01

From: (Name and Address)

Byron Galloway (Butch)

Natural Resources and  
Environment Team

Telephone No. (202) 512-7247

Fax Telephone No. (202) 512-8354

Date 8/20/01

Subject: Guam visit re Contaminated Defense Sites

## Additional Information

Per our telephone discussion on Aug. 16, here is some information on our review. Specifically:

- 1. Request letter from Congressmen Underwood, Hetley, and Taylor
- 2. GAO reply to the request (Statement of Intent)
- 3. GAO letter to Department of Defense notifying of job.
- 4. List of discussion issues/topics for Honolulu/Guam visit
- 5. Tentative schedule of meetings with non-DoD people on Guam (We tour FUDS, Air Force, and Navy sites on Sept. 4, 5, and 6, respectively).

If you have any other suggested contacts in Guam or if we should meet with you or someone else in the Governor's office, let me know.

## Acknowledgement Requested

1. ☐ Yes ☐ No

2. 8 pages, including this cover sheet, are being transmitted.

3. If pages are not received, call Butch (202) 512-7247

*Butch*



Compact Impact  
Page 1 of 1  
GAO

**Leland Bettis**

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**From:** Emil E Friberg Jr <FribergE@gao.gov>  
**To:** leland bettis govoff <lbettis@mail.gov.gu>  
**Cc:** Leslie E Holen <Holenl@GAO.GOV>  
**Sent:** Friday, September 21, 2001 2:31 AM  
**Subject:** Re: GovGuam Comments on the GAO CI Report

Sorry to be so slow in getting back to you. Your comments were fine by us. We responded in various ways, often saying something was outside our scope! (as you predicted!). Using material provided by Calvin, we also added some estimates of the impact of migrant children on school capital requirements.

I am alarmed by the recent economic/budget news clips I see on Guam. If you have any "position papers" etc. that you want to share I would like to read them. In my meetings on the Hill I have discussed the difficult economic conditions faced by the CNMI due to the WTO apparel agreement, but had never discussed Guam's position.

Hope to see you again. Let us know if you are in SF or DC. We appreciate your help and the GovGuam's cooperation with GAO during this assignment.

Thanks, Emil

>>> "Leland Bettis" <lbettis@mail.gov.gu> 08/30/01 01:02AM >>>

Attached is the letter and comments on the CI report. In general our comments are on matters which are largely outside of the scope of your directive...but points which we believe need to be made with respect to the issue.

Please give me your feedback.

Leland