

CHAPTER 10

Base Camp Cleanup and Closure

10-1. Introduction. When the U.S. military presence in a HN is terminated or reduced, the force is reconfigured, or the United States no longer requires a particular location, base camp cleanup and closure actions will likely become necessary (see Figure 10-1). Base camp cleanup and closure, when planned and properly executed, is a complex set of procedures.

a. After prior wars, many U.S. military base camp areas were stripped of valuable property and equipment, fenced off, then left to rust and deteriorate. Munitions, petroleum products, toxic chemicals, combat losses, and solid wastes were improperly buried in unmarked, unmapped locations or simply left where they stood. Not only did this situation occur in overseas areas, the same condition is sometimes found within the United States. This has left a hazardous and dangerous legacy in many locations.

b. A key element of a sound BCDP is that base camp cleanup and closure planning must start when base camp planning first begins. Exit strategy development intensifies as the location selection process and the environmental baseline analysis are executed and land use and general site planning are accomplished. The strategy must go on to plan the cleanup, restoration, and return of the base camp land area to its HN owners.

c. It is vital that an initial EBS and EHSA be performed as soon as possible to accurately document the site condition. This information is crucial not only for the health of service members and civilians, but also to provide a baseline of information about the site to ensure that U.S. forces do not incur additional liability for preexisting environmental conditions.

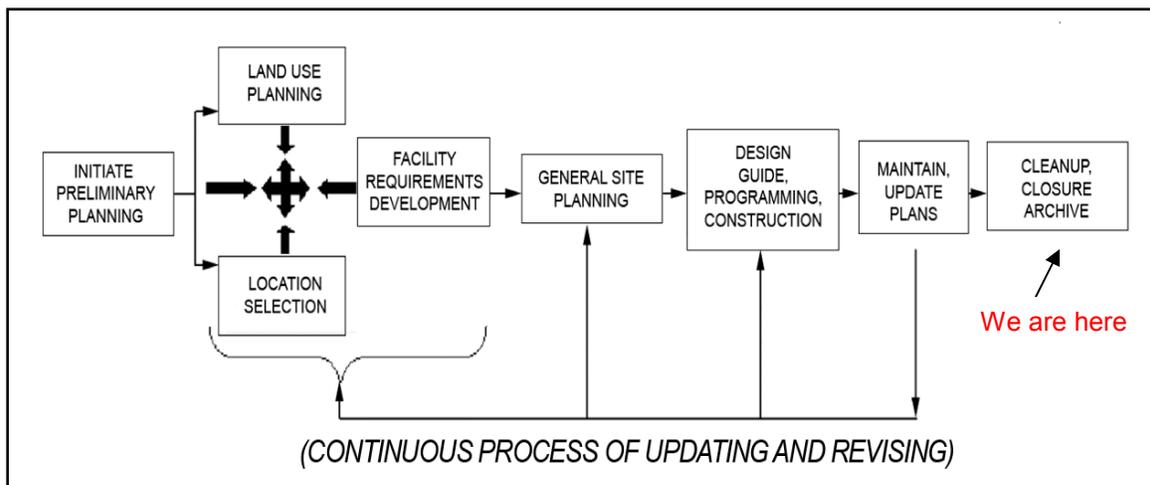


Figure 10-1. The base camp development planning process

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10-2. Legal Requirements and Considerations. A wide range of U.S. and HN laws, regulations, policies, and procedures may apply to an operation involving the cleanup and closure of a base camp. In those cases where U.S. policies are more stringent than those of the HN, the U.S. policies will usually govern. Although they do not have the force of law within a TO, the ethical and practical intent, as well as the spirit, of many U.S. laws strongly influence how base camp cleanup and closure operations should be planned and executed. Specifically, there are certain laws and agreements which have direct impact on base camp operations.

a. Land use agreements. The land use agreement for the U.S. occupancy of a base camp is the basis for the facilities-related interaction between the United States and the HN and is the keystone document in fostering the successful execution of a cleanup and closure plan. The land use agreement may be an appendix to a SOFA. The land use agreement would define where the U.S. military presence will be located and what HN facilities it may use. This document would contain information about how a base camp cleanup and closure operation would be coordinated, executed, inspected, and documented.

b. Status of forces agreements. SOFAs are arrangements made between the United States and specific HNs that specify various privileges and responsibilities on the part of both parties. These agreements include a number of areas, from the legal status of U.S. forces and personnel, to particular basing rights at certain locations. These agreements may also include information specific to the HN regarding base camp construction standards, HN contracting, cleanup and closure guidelines, and environmental guidance.

c. Final governing standards (FGS). While SOFAs apply to a variety of considerations, FGS are environmental standards developed in cooperation with a specific HN. While the environmental considerations of base camp closure and cleanup may be specified in the FGS, other aspects of camp closure, such as facility turnover to the HN, may be found in the SOFA. DOD Publication 4715.5-G provides the criteria for developing FGS.

d. Overseas environmental baseline guidance document. If specific SOFAs and/or FGS are not developed, base camps will adhere to provisions in DOD Publication 4715.5-G as applicable. This publication provides a baseline of environmental compliance considerations. Command policy and fragmentary orders should also be reviewed for environmental considerations.

e. Guidance in OPLANs and OPORDs. Annex L to Joint OPORDs and Appendix 2 to Annex F (Engineer) of Army OPORDs provide environmental guidance to units conducting operations. This guidance will provide information on how the commander sees the unit executing its mission with respect to environmental considerations. This information, in particular that found in Annex L to Joint OPORDs, will reflect the guidance received from the theater Joint Environmental Management Board and will integrate the various legal requirements.

f. Basel Convention. The Basel Convention is an international agreement that regulates the movement of HM/HW across international boundaries. This convention may affect base camp operation, cleanup, and closure by impacting how HM/HW is disposed of.

g. Executive Order 11987, Organic Organisms. This executive order prohibits the importation of exotic species, including plants, animals, and fungi, into the U.S. ecosystem. As a result of this order, all U.S. equipment must be washed and inspected before return to the United States. An implied task that results from this order is the need to establish wash rack facilities at base camps, in particular ISBs where equipment is being prepared for movement, in order to clean equipment.

10-3. Operational Considerations Related to Base Camp Cleanup and Closure. Base camp cleanup and closure presents many challenges. In most circumstances, agreements with the HN specify the final end state of camp closure or turnover. Since it is also necessary for forces to continue living on or near that camp, the closure plan must take this and the associated AT/FP measures into account.

a. Base camp closure agreements. If a base camp closure agreement exists with the HN, it will drive the procedures and end state of the camp closure. The overall agreement will specify the status and condition of the camp at turnover or closure. Preferably, the land use agreement will establish the end state of the property before camp closure or turnover. A number of areas may be addressed when dealing with base camp cleanup and closure agreements. These should be integrated into the base camp closure plan.

b. The base camp closure plan. The centerpiece of a superior base camp cleanup and closure plan is the meticulous documentation of every task performed as part of the cleanup and closure operation. The base camp cleanup and closure plan is the mechanism that governs how the cleanup and closure operation, as indicated in the closure agreement, will be performed, managed, and documented. As a minimum, a base camp cleanup and closure plan should document the following tasks:

(1) Condition of the property. The initial EBS should provide a baseline for what the property looked like, especially with regard to environmental considerations, before the camp was established. The closure plan will address issues such as filling in excavations, removing structures, closing landfills, remediating the environment, and restoring pre-existing land uses such as agriculture.

(2) Disposition of facilities. If there were existing structured on the site, or if others were built, the closure plan will have to address if those buildings are be removed or turned over to the HN. If turnover is anticipated, the plan should also include guidance on the facility conditions and specify who is to perform what level of repairs.

(3) Environmental cleanup standards. The closure plan should include which environmental standards, such as the SOFA, FGS, or DOD Publication 4715.5-G, will be used and how those provision will be implemented.

(4) UXO removal. UXO removal is a crucial part of base camp closure, and the plan should address the responsibilities of all parties involved.

(5) Site mapping. This task encompasses land areas, buildings and structures, and infrastructure, and would include a real property inventory (RPI) or building information schedule (BIS). Corresponding maps would be annotated with the locations of various cleanup and closure actions, and may also indicate the phasing of these tasks. The site mapping should show the base camp infrastructure as well as any UXO, fuel and HM/HW spills, and other environmental considerations.

(6) Execution of base camp closure. Creating phasing plans, schedules, and specific task assignments for realistically achieving the desired land and facilities condition is essential to an effective closure plan. The phasing plans and time frames for achieving the objective end state should be sequenced in priorities; for example, which tasks should happen first, second, third, and so forth? Who is assigned to perform these tasks? Which tasks must be accomplished before others? Which tasks can be accomplished simultaneously? Critical path or Gantt charts could be used to portray phasing. Appendix H provides a sample of this portion of a base camp closure plan.

(7) Checklists. Checklists should be developed for inspectors to certify the acceptability or unacceptability of the many cleanup and closure tasks at predetermined phases of execution and to indicate what corrective actions would be required. This is especially important in the case of EOD; nuclear, biological, and chemical (NBC) weapons; certification of firing range cleanup and closure; and hazardous and toxic waste cleanup and disposal (see Appendix H).

(8) Methods of adjudicating claims. In the event that claims for damages do incur, or there are disputes over closure standards, a method of adjudicating these claims should be included in the closure document.

(9) Signatures. Provide a section in the plan for appropriate U.S. and HN signatures to certify that the agreed upon objective end state conditions have been achieved.

(10) Uncompleted actions. Provide a section in the plan (if applicable) to indicate the activities and locations where the objective condition could not be achieved, including the appropriate explanations and justifications.

(11) Base camp records. Maintain accurate records of before, during, and after activities to assist with base camp closure and liability issues (see paragraph 10-5).

c. Specific closure considerations. A number of areas within the base camp closure may require specific considerations. Some of these include facilities, disposition of materials, force protection measures, land, and environmental considerations.

(1) Facilities. Whether existing or new construction was used in the base camp, a plan must be developed to specify the facility turnover to the HN. Considerations for facility turnover include—

- Which buildings will be turned over and which one will be demolished or removed.
- Who is responsible for removal or demolition and what is the disposition plan for waste materials?
- What are the provisions for the joint inspection program between U.S. forces and the HN?
- Should financial arrangements be made for the transfer of funds to implement building repair or demolition?
- What are the provisions for the legal transfer of real property?

(2) Disposition of materials. Base camps include large quantities of a variety of different materials, ranging from concrete barriers for AT/FP to electrical wiring providing power distribution for the base camp. In most cases, these materials will not be removed by U.S. forces, but will be turned over to the HN or disposed of properly. The base camp closure plan should address the disposition of these materials. Options may include disposal, sale to the HN government, sale to HN civilians, or “controlled looting,” whereby civilians are allowed to scavenge for materials. Some materials that are often specified for disposition include—

- Construction materials.
- Office furniture.
- Generators and heating and air conditioning units.
- Electrical wiring.
- Plumbing, water, and sewerage materials.
- General supplies.
- Communications wire and equipment.
- Tents.

(3) Protection measures. It will likely be necessary to leave certain AT/FP measures in place during the cleanup and closure process. The base camp closure plan should include considerations related to maintaining AT/FP measures, while ensuring that those not needed are integrated into closure. Many of the materials associated with base camp protection will be disposed of locally or turned over to the HN. Some of the specific areas of concern include—

- Removing or turning over barbed wire and perimeter fencing.
- Filling in fighting positions.

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- Removing or turning over concrete barriers and HESCO barriers or sand bags.
- Bulldozing protective berms and filling in antivehicle ditches.
- Removing or turning over additional structures and material such as guard towers and perimeter lighting.

(4) Land. In some cases, it may be necessary to return the land to its original condition. This may include the removal of any additional rock or gravel that was spread on the site, the removal of roads, regrading the area to match its original drainage, and re-establishing agricultural areas.

(5) Environmental considerations. A variety of environmental considerations must be addressed. These are discussed further in paragraph 10-6.

10-4. Executing Base Camp Closure. The base camp closure assessment team (BCCAT) is a high-level planning team that executes the orders to deconstruct base camp assets and enables the redeployment of military units that were stationed there. It works to develop and execute base camp cleanup and closure. Activities lists associated with the BCCAT and base camp closure in general are located in Appendix H.

a. Tactical considerations. The tactical situation at the time that the base camp closure is executed will determine much of how the closure plan is executed. A forced withdrawal from the camp, whether caused by the military, environmental, or political situation, will greatly reduce the amount of closure activities that can be executed. The threat condition may dictate that only essential personnel and supplies are removed in order to speed up the closure process and reduce the number of convoys required. In addition, the tactical situation will dictate the amount and types of AT/FP measures that must remain in place.

b. Approaches to base camp cleanup and closure. The base camp cleanup and closure team develops and identifies at least three solid base camp cleanup and closure alternative plans, selects the best alternative, briefs it to the commander for approval and, once approved, proceeds with cleanup and closure. Although there are many detailed approaches to accomplishing base camp cleanup and closure across the broad range of base camp facilities, several general ones (each of which is suitable for modification or in combination with other alternatives) are discussed as follows:

(1) The regressive approach. A regressive approach means that the base camp cleanup and closure team, along with an assigned military and civilian workforce, would accomplish all cleanup, demolition, and disposal actions for a base camp where living and support facilities gradually consolidate (shrink and decrease) over time.

(a) For example, in the case where utility services have been disconnected, the base camp cleanup and closure team and its assigned workforce would be relying on portable water tanks and power generators.

(b) Another example is the case where all buildings have been dismantled. Cleanup and closure personnel would operate from tents, containers, and their assigned vehicles while completing base camp cleanup and closure operations.

(2) The enclave approach. In this approach, the transition team, its workforce, and the security force, would occupy a secured central enclave of facilities within the base camp area throughout the cleanup and closure process. Beginning at the base camp periphery, all other facilities would be demolished on an incremental basis until the central enclave is reached. Then the team and its personnel would occupy short-term living space, such as containers or tents, until the last enclave would be eliminated.

(3) The off-site approach. In this approach, the team and its assigned workforce and security force would live at a location other than the base camp, such as at another U.S. facility or on the local economy. Security forces would protect the base camp at all times. The cleanup and demolition operation would be carried out across-the-board without the need to retain any facilities and services, because there would be no remaining full-time occupants.

(4) The contractor approach. Under this alternative, the base camp would be vacated by U.S. forces and turned over to a U.S. or multinational contractor for cleanup and closure. The contract would be prepared and awarded by the applicable joint contracting command. The base camp cleanup and closure team would have critical input to this process and may be asked by the joint contracting command to assist in administering the contract. Although this might be the most costly alternative to execute, it would free U.S. military forces for other missions.

(5) The host nation government approach. This approach would turn over the base camp, in whole or in part, to the HN for either closure using HN labor or continued use by the HN. It is important to understand that when government-owned structures and/or equipment are turned over to a HN, coordination through the Office of Defense Cooperation, the U.S. Embassy, and the real estate team which may be augmented or otherwise supported by the USACE Contingency Real Estate Support Teams (CREST) must be accomplished before closure. This requires interagency coordination between the Secretary of Defense (SECDEF), the Joint Chiefs of Staff, and the DOS. The base camp cleanup and closure team would have less control over this alternative as compared to the others. Such an approach requires formal agreements with the HN that release the United States from all liabilities in connection with turnover of the base camp to the HN. Possible conditions of turnover might be—

(a) On an "as-is" basis, although interagency coordination must be accomplished first as described above.

(b) After the United States performs a specified amount of cleanup, demolition, maintenance, and repair.

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(c) After the HN performs a specified amount of U.S.-reimbursed cleanup, demolition, maintenance, and repair.

(6) The U.S. intragovernmental agency approach. In this approach, the base camp would be turned over to a specific U.S. government agency, such as the United States Agency for International Development or the Peace Corps, based on an agreement between DOD, through the U.S. DOS, and another U.S. government department. Turnover will be either in an "as-is" condition or after certain maintenance, repair, and cleanup tasks have been performed. A transition period of joint action between the BCCAT and the receiving agency would be required for property transfer, redeployment, or disposal tasks. For example, a joint command turns over a base camp to the U.S. DOS for housing displaced persons.

10-5. The Base Camp Cleanup and Closure Archive. The base camp cleanup and closure archive is a compendium of documents, maps, the complete base camp development plan, audiovisual media, closeout EBS, and other information that records the life span of a base camp through to its cleanup and closure—what has taken place and been done there by whom, where, when, how and, in some cases, why.

a. Reasons for establishing a base camp cleanup and closure archive include—

- Establishing a complete record of what was done, what could not be done, and why.
- Influencing future land use.
- Providing a record to prevent future liability against U.S. forces.
- Providing maps and records to ensure environmental protection and the safety of HN civilians.

b. The U.S. military may not leave a base camp without first preparing a complete record of what was done and what was not done, or not possible to do, to clean it up and close it. A detailed, permanent historical record of the location should be created with the objective of facilitating the future use of the location, while at the same time preventing unknown future actions that could jeopardize health, life, safety, and the environment. Ethically, the United States may not absolve itself of the responsibility for how it used the land it occupied. Once it is assembled, the recommended process for administering the base camp cleanup and closure archive is—

(1) First, the BCCAT would take the archive to the appropriate security office, where it would be reviewed to determine which parts are classified (not releasable to the HN, allies, or the U.S. general public).

(2) Second, the full record copy of the archive would be sent to the office designated as the 'office of record' for base camp cleanup and closure archives by the appropriate unified command or theater commander. For example, within the U.S. Army

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Europe (USAREUR) the office of record for these archives is USAREUR-Office of the Judge Advocate.

(3) Third, the archive should be provided to the appropriate U.S. DOS representative, because the DOS likely would assume that providing base camp closure information to the HN is their responsibility, subsequent to their representatives signing appropriate statements of closure. A copy of the archive should also be forwarded to the Headquarters, USACE Office of History and USACHPPM.

(4) Finally, the DOS or an office of record designated by the theater commander would certify the archive, then provide an abridged, unclassified version of it to the HN (if applicable), U.S. allies, and the U.S. National Archives for the Public Record.

c. The base camp cleanup and closure archive documents and maintains the following key information:

(1) Information that may be required in the future by individuals conducting approved scientific, medical, environmental, legal, and military research.

(2) General information regarding the agreements between the United States and the HN that form a chronological history of the base camp, including information on its occupants and operations and the facts detailing its cleanup and closure.

(3) Precautionary information relating to health, safety, and environmental matters, especially with respect to the existence of red zones (areas containing UXO, NBC material, and other hazardous and toxic residue).

(4) Technical information and operational records regarding any facilities and equipment that existed in a base camp when the United States relinquished control of it to the HN, where applicable.

(5) Decision-making information that could be used by the HN to determine how the former base camp's land might be used and further developed in the future.

(6) Information listing the POCs for questions concerning the procedures used and the tasks accomplished during base camp cleanup and closure.

d. A recommended list of contents for the archive is as follows:

(1) All components of the base camp development plan, including the base camp cleanup and closure plan and the closeout EBS.

(2) Maps, real property, construction, operation, maintenance, repair, and facility utilization assignment records of the former base camp.

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(3) The RPI or the BIS that lists and describes land areas, buildings, and structures located within the base camp boundaries.

(4) Lists and records of the base camp's land management and facility-related projects and associated actions.

(5) Range and training area utilization records, if applicable, including range maps and the types of weapons fired at each range.

(6) Lists of the units, organizations, and names of POCs, as well as names of responsible officials involved in base camp development, operation, maintenance, repair, and cleanup and closure.

(7) A brief history of the base camp, including a description of the military operations that took place at the base camp and in the vicinity.

(8) Copies of real estate leases and/or use agreements, utilization inspection, and disposal reports and documents.

(9) Copies of all U.S. and HN agreement, interaction, and approval documents.

10-6. Environmental Considerations. Environmental considerations will play a large role in base camp cleanup and closure. The extent that they factor into base camp closure and cleanup will depend on agreements with the HN; laws, regulations, and treaties; and the tactical situation. While there are many environmental aspects to base cleanup and closure, certain areas will have the greatest impact. These areas include the completion of the closeout EBS, landfill and latrine closure and marking, HM/HW removal, POL removal (to include contamination), and the protection and restoration of cultural sites. See Appendix I for additional information on environmental considerations associated with base camp planning, operation, cleanup, and closure.

a. Closeout EBS. The closeout EBS documents environmental conditions as they exist at base camp closure and provides a comparison with the initial EBS performed when the base camp was established. This allows for a common frame of reference between the United States and the HN and provides for protection from liability for damages that were not caused by U.S. forces or activities. The closeout EBS should be performed by qualified environmental personnel to get the best results and may include the requirements to conduct soil and water sampling to determine the presence and type of contaminants.

b. Landfill and latrine closure and marking. When closing base camps, all landfills, latrines, and DFAC soakage pits must be closed and marked. While simple methods will generally involve only covering with earth, agreements with the HN may require more detailed methods and some form of long-term monitoring to detect potential groundwater contamination as some landfills may have been poorly constructed from the outset. In the

absence of formal guidance, best management practices must be used. This may entail enlisting environmental experts to ensure the best possible solutions.

c. Hazardous materiel/hazardous waste; petroleum, oils, and lubricants; and medical waste removal. These materials, in particular HM/HW and medical wastes, can represent a significant portion of the workload associated with base camp cleanup and closure. In particular, closure agreements may require that any spills be cleaned up before camp closure. All material not earmarked for turnover to the HN must be removed from the camp. The removal process must include proper safety measures for transportation and storage. Since the movement of HM/HW is constrained by international agreements, early planning is essential to ensure that transportation and international boundary transits can be arranged in a timely manner.

d. Cultural sites. In some circumstances, the base camp location may include sites of cultural, religious, or historic importance to the HN. In the event that damage has occurred to these sites, it is necessary to make repairs and restoration. While U.S. forces may be well-intentioned in this regard, any repair or restoration plans must include the advice and assistance of SMEs to ensure that the attempted repairs do not lead to more damage.

