



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
PROGRAM MANAGER FOR ROCKY MOUNTAIN ARSENAL
COMMERCE CITY, COLORADO 80022-2180



17 July 1991

AMXRM-PM (310-2d)

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Authorized Access to and Allowable Activities at Rocky Mountain Arsenal (RMA)

1. This letter sets forth policy and procedures for access to and allowable activities at Rocky Mountain Arsenal that will be enforced by PMRMA. This policy applies to all parties at RMA, including but not limited to those parties involved in the Arsenal clean-up, and their contractors, and all visitors participating in RMA-approved programs, activities, and tours. Parties to the clean-up include RMA staff, the Environmental Protection Agency (EPA), the Department of Justice (DOJ), the Department of the Interior (DOI), Shell, and the State of Colorado. All other personnel are considered visitors to RMA.

2. RMA has been divided into three areas based on surficial soils data and other contaminant studies from the Remedial Investigation at the Arsenal. Access and activities will be regulated according to the type of activity being performed, the area involved, individuals or organizations performing the activity, and natural resource conservation needs. All activities are subject to Program Manager, Rocky Mountain Arsenal (PMRMA) approval. U.S. Fish and Wildlife Service (USFWS) approval is required for conservation of fish and wildlife on RMA. Necessary coordination and approval for access by the PMRMA and USFWS are outlined below under paragraph 4 (Visitor Access Guidelines) and paragraph 5 (Notification and Review Requirements).

3. Enclosure 1 is a map of RMA with a brief description of allowable activities and access procedures. The areas are color and otherwise coded, and an explanation of the codes and activities are located in the map legend. Activities and access to each color-coded area listed below are grouped by area, general description of access and allowable activities, and specific requirements.

This policy supersedes all previous policies concerning authorized access and allowable activities at RMA. This policy does not restrict the Environmental Protection Agency (EPA) or other federal regulatory agencies' access to the Arsenal to perform statutory oversight and inspection functions.

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a. WHITE areas. No restriction on access or activity except by general regulations and by USFWS. Visitor-access guidelines, and notification and review requirements are described below:

(1) Visitors. Visitors may have access to white areas to participate in PMRMA-approved programs, including, but not limited to, recreational activities such as guided bus tours, bird watching, dog trials, hiking, biking, and jogging. Volunteer and Scout programs are also included in these activities. The USFWS is responsible for the management of and access to wildlife habitat areas throughout the Arsenal. These areas include most of the land area of RMA, especially those areas that are not major roadways or industrial/administrative areas. In particular, USFWS coordinates all activities which involve access to the Bald Eagle Management Area (BEMA) during the Bald Eagle roosting period at the Arsenal. Visitors may participate in supervised land-intrusive activities in white areas. Intrusive activities include, but are not limited to, those activities which may result in a displacement of surficial soil, such as excavation, trenching, and tilling. Visitors may not remove any historical or other artifacts, materials, or objects, from the Arsenal without approval from PMRMA.

(2) Parties to the clean-up and their contractors. Parties to the clean-up and their contractor personnel working on the Arsenal may perform both routine industrial and intrusive operations in white areas without prior approval from the PMRMA Compliance Office. Activities in white areas require prior coordination and approval from the USFWS when the activities are within wildlife habitats, particularly off-road-access requirements.

b. BLUE areas. Limited-use access. Visitor-access guidelines, notification, and review requirements are described below.

(1) Visitors. Visitor access to blue areas is not restricted if the visitor is participating in PMRMA-approved activities. Visitors are not allowed to engage in or participate in intrusive activities in this area. Access to wildlife habitats within the blue areas requires approval of the USFWS.

(2) Parties to the clean-up and their contractors.

(a) Non-intrusive activities are permitted in these areas by clean-up and contractor personnel without prior approval by the Compliance Office subject to notification and review requirements described below. Access to wildlife habitats within blue areas requires approval of the USFWS.

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(b) Intrusive activities in blue areas must be coordinated with and approved by the PMRMA Compliance Office prior to starting work. A PMRMA approved health and safety plan is required for intrusive activities in blue and pink areas. Use of personal protective equipment may be required for intrusive activities in blue areas based on the type and extent of contamination and the activity being performed. Requirements for personal protective equipment and monitoring devices will be addressed in the Health and Safety Plan used for the particular operation and reviewed by the Compliance Office prior to starting operations.

c. PINK areas. Restricted access and activities. Entry is subject to approval of a PMRMA-approved Health and Safety Plan. Visitor-access guidelines and notification requirements are described below.

(1) Visitors. Visitors are not permitted in pink areas with the exception of guided bus tours on hard-surfaced roads and fishing in lakes on the Arsenal (specifically, Lakes Mary, Ladora, and Lower Derby). A further description of the allowed exceptions for visitor access is listed below.

(a) Tours utilizing hard-surfaced roads. Public tours will be coordinated between the USFWS and PMRMA Public Affairs Office; and the tour routes will be approved by the PMRMA Compliance Office.

(b) Fishing in lakes located in pink areas. Contamination in the lakes is located in some lake-bottom sediments, and those sediments should not be disturbed by fishing. Personnel should consult the USFWS for additional guidance and policy concerning use of Arsenal lakes for fishing.

(c) No other activities are authorized for visitors in pink areas.

(2) Parties to the clean-up and their contractors. Entry and work authorization for pink areas, by any group, will be coordinated with and approved by the PMRMA Compliance Office. The following exceptions apply to the parties to the clean-up and their contractors working in pink areas at the Arsenal.

(a) Activities supporting clean-up efforts (i.e., IRA's, treatability studies, etc.). Parties to the clean-up and their contractors will continue to follow safety and health guidelines

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outlined in existing Health and Safety Plans for IRA's, treatability studies, and other work activities in pink areas. The Compliance Office will review Health and Safety Plans to ensure the plans address protection requirements for work within pink areas. Coordination of activities in pink areas within wildlife habitats, particularly off-road-access requirements, require USFWS approval.

(b) Travel on hard-surfaced roads and work activities by parties to the clean-up and their contractors within buildings located in pink areas will be allowed without PMRMA approval, subject to notification and review requirements described below.

4. Visitor Access Guidelines:

a. Any visitor to RMA must be sponsored by a party to the clean-up. RMA Security will not admit any visitor without corroborating with the sponsor the validity of the visitor's access needs. Approved PMRMA-access programs may override this requirement. RMA Security may also grant access to visitors based on mission support to administrative areas.

b. Any visitor requesting access to RMA from Security must specify a sponsor's name.

5. Notification and Review Requirements:

a. Parties to the clean-up and their contractors will submit a written work plan to the PMRMA Compliance Office at each weekly contractors' meeting, but in no event later than 0900 each Tuesday morning for the following week, inclusive of Monday through Sunday.

b. Work plans should be considered as approved by PMRMA if the parties or contractor proposing such activities are not notified by 1200 on the Thursday preceding the proposed work period. Notification will be made by facsimile letter to the point of contact specified in the work plan.

c. The PMRMA Compliance Office will publish a written schedule and associated map describing all plans proposed for each subsequent week, as herein defined by 1200 on each Thursday. This information will be posted in RMA Building 111, disseminated at the Weekly Staff Meeting, and made available by facsimile

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letter to requesting parties or contractors. All parties to the clean-up and their contractors shall review this schedule and map to ensure that their activities do not conflict with other proposed activities. Any potential conflict should be reported to the PMRMA Compliance Office at 289-0441 or RMA Security at 289-0369 immediately.

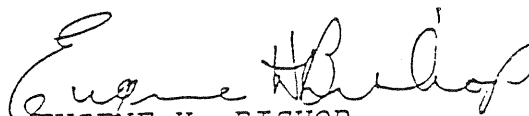
6. ACTIVITY GUIDANCE:

a. Intrusive and other work activities may require the use of personal protective equipment in both blue and pink areas. The level of protection required for work activities in these areas will be outlined in the site-specific Health and Safety Plan and reviewed by the Compliance Office.

b. All activities impacting wildlife habitats must be coordinated and approved by the USFWS for all areas throughout RMA to ensure management requirements.

7. Point of contact for these actions is the RMA Compliance Office, telephone 289-0112/289-0338/289-0352.

Encl



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Program Manager

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