

1. Reference memorandum, AMCEN-R, 25 Sep 98, Subject: Environmental Baseline Survey Requirements to Support Disposal of Buildings/Facilities Without Underlying Land.
2. The above memorandum provides guidance on Environmental Baseline Survey Requirements to Support Disposal of Buildings/Facilities Without Underlying Land. This memo specifically addresses the EBS and NEPA requirements associated with the DA Form 337.
3. There is no requirement to do an EBS to support the DA form 337. However, the guidance notes that an installation must generate sufficient information to make a determination on the DA Form 337 that ACM, PCB, or other hazardous substances are not present in the building. If these types of hazardous substances are present the DA Form 337 should "describe procedures for eliminating or controlling them during demolition and confirm compliance with applicable Federal standards". See AR 405-90, para B-7h.
4. The guidance also recommends that contractor demolition operations should require contract performance in accordance with the law. In particular, the solicitation and contract should advise about the potential or actual knowledge of hazardous conditions, such as lead-base paint, asbestos containing material, etc, which require special handling. It may be advisable to prepare an environmental building assessment (EBA) to summarize the various hazardous substances known to be contained in each building. In such case, the DA Form 337 should describe the use of the EBA as part of the description of procedures for eliminating controlled hazardous substances during demolition but it is not necessary to submit the individual EBA's as part of the DA Form 337.
5. Appropriate NEPA document is also required to support the building/facility disposal action. This could be an Environmental Assessment or Categorical Exclusion, or even a CERCLA ROD if it adequately addresses the demolition of the buildings.