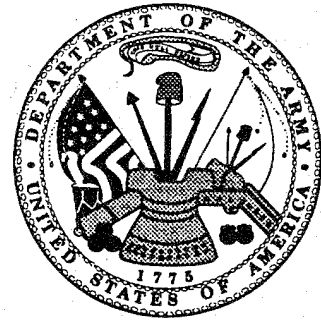




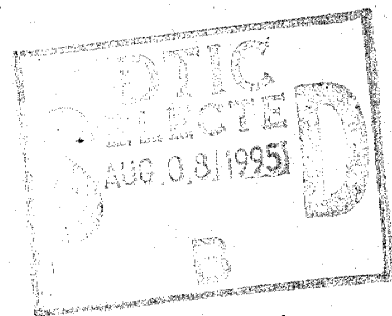
**US Army Corps
of Engineers**
Construction Engineering
Research Laboratories



The Active Army Supplement for The Environmental Assessment and Management (TEAM) Guide

The number of environmental laws and regulations have continued to grow in the United States, making compliance with these regulations increasingly difficult. Environmental assessments became a way to determine operational consistency and compliance with current environmental regulations.

Beginning in 1985, the U.S. Army Construction Engineering Research Laboratories (USACERL), in cooperation with the U.S. Army Environmental Center (USAEC), began the research that led to the publication of the Environmental Compliance Assessment System (ECAS). In fiscal year 1994, the U.S. Army became a participant in the efforts to create a single compliance assessment manual for use by all members of the DOD. The resultant manual is The Environmental Assessment and Management (TEAM) Guide. In order to examine Army Regulations (ARs), the Active Army supplement was developed to use in conjunction with the TEAM Guide.



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FOREWORD

The research was performed for the Army under Military Interdepartmental Purchase Request (MIPR) number 2095. The technical monitor was Bob Shakeshaft, SFIM-AEC-ECP.

The research was performed by the Environmental Compliance Modeling and Systems Division (EC) of the U.S. Army Construction Engineering Research Laboratories (USACERL). The Principal Investigator was Donna J. Schell, Environmental Protocol Team, CECER-ECP. Dr. Diane K. Mann, CECER-ECP is Acting Team Leader. Dr. John T. Bandy is Acting Chief, CECER-EC, and William D. Goran is Acting Chief, CECER-EL.

LTC David J. Rehbein is Commander and Acting Director, USACERL, and Dr. Michael J. O'Connor is Technical Director.

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NOTICE

This guide is intended as general guidance for personnel at U.S. Army installations. It is not, nor is it intended to be, a complete treatise on environmental laws and regulations. Neither the U.S. Government nor any agency thereof, nor any of their employees, makes any warranty, expressed or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information contained herein. For any specific questions about, or interpretations of, the legal references herein, consult appropriate counsel.

ACTIVE ARMY SUPPLEMENT FOR TEAM GUIDE

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ACTIVE ARMY SUPPLEMENT COMPLIANCE CATEGORIES

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INTRODUCTION

This manual supplements The Environmental Assessment and Management (TEAM) Guide. Specifically, this supplement:

1. compiles applicable Army and DOD regulations
2. synthesizes environmental regulations, management practices (MPs), and risk management issues into consistent and easy-to-use checklists
3. serves as an aid in the assessment process and management action development phases of Environmental Compliance Assessment System (ECAS).

The information in this supplement applies to all Active Army installations and facilities in the United States and its territories. Army Regulation (AR) 200-1 was being revised at the time this supplement was being prepared. No changes to Army policy proposed by this rewrite have been included in the supplement. After final publication of the new AR, this supplement will be updated.

Any changes or suggestions for improving this supplement should be forwarded to USAEC (SFIM-AEC-ECP), Aberdeen Proving Ground, MD, 21010-5401, fax number 410-671-1675.

The contents of this supplement are up-to-date as of 15 February 1995.

ENVIRONMENTAL COMPLIANCE ASSESSMENT PROCESS

The environmental assessment process can be divided into four distinct phases:

1. preassessment phase
2. site assessment phase
3. post-assessment phase
4. implementation phase.

Pre-Assessment Phase - Five key activities should be completed before an assessment team begins the assessment activities.

1. **Previsit Questionnaire.** The purpose of the previsit questionnaire is to collect information that will familiarize the assessment team with the facility and its operations so they are able to review the applicable regulations and prepare a detailed assessment schedule. A copy of the most recent previsit questionnaire may be obtained from AEC.
2. **Define Assessment Scope and Team Responsibilities.** The installation or Major Army Command (MACOM) may wish to place special emphasis on certain sections or to review additional areas not covered in the manual. These goals must be stated early so the assessment can be planned properly. Additionally, the duration of the assessment and handling of tenants and/or offpost sites must be addressed. Finally, responsibilities for each of the sections must be assigned to team members as appropriate.
3. **Review Relevant Regulations.** Once the assessment scope and responsibilities are known, the assessors should undertake a thorough review of relevant Federal, state, and local regulations affecting the facility as well as reviewing this Supplement and the TEAM Guide. The applicable environmental regulations must be determined before assessment begins. If not already

available, checklist items for state and local requirements should be added to the checklists in the TEAM Guide. See page xviii for a correlation of major Army activities and applicable guide and Supplement sections.

4. **Develop Assessment Schedule.** The team should develop a detailed assessment schedule that includes the activities planned for each day.
5. **Review Protocol or Checklist Sections.** Each assessor should know the regulatory requirements, schedule, and be familiar with the assessment checklists that will be used.

Onsite Assessment Activities - A general description of onsite activities is given below. Some details of this may vary depending on installation and MACOM desires.

1. **Installation In-brief.** A formal in-briefing is usually held the first day of the assessment. The team leader briefs the Installation Commander, environmental staff, the Environmental Quality Control Committee (EQCC), MACOM representatives, and other interested personnel on ECAS goals and activities. Other key activities are to introduce the assessment team, outline the assessment schedule, and address any concerns the Commander may have.
2. **Conduct Assessment.** The team evaluates a sample of installation operations with impacts on the environment. The duration of the site assessment ranges from 1 day to 2 weeks, depending on the size and the number of activities at the installation. The assessment team reviews the paperwork (e.g., permits, plans) interviews relevant installation staff, and walks the installation facilities to observe the operations. Observations are compared with standards in the checklists (missing standards are added to the checklists) and deficiencies are written as findings.
3. **Write Finding Sheets.** The team prepares finding sheets with recommended corrective actions when compliance deficiencies are observed. The team leader performs the quality assurance on the finding sheets. Findings may be written on the findings sheet shown in Figure 1 (see page ix) or, at the discretion of the team leader, directly in the ECAS Software. The finding sheet requests the same information as the software.
4. **Daily Outbriefing.** This is a daily meeting between the team and the installation to present the preliminary findings and get feedback on other areas to be looked at. These daily meetings are important to validate findings while the team is in the field and help resolve any differences that may occur.
5. **Exit Briefing.** The formal exit briefing is held at the close of the field work and normally given to the Installation Commander and the EQCC.

Post-Assessment Phase - Key activities in this phase are detailed findings review by the installation and report preparation by the assessment team. The details of the report flow may vary by MACOM, but in all cases the team will continue to support the installation with developing corrective actions for findings, as requested. The phase concludes with submission of the Environmental Compliance Assessment Report (ECAR) to the MACOM.

Implementation Phase - During this phase, installations implement corrective actions and follow-up on the compliance deficiencies to ensure they are eliminated. Many MACOMs are requiring an Installation Corrective Action Plan (ICAP) to maintain a funding strategy and track corrective action progress. This phase is ongoing and installations may add findings to their ICAP at any time.

DRAFT

ECAS INDIVIDUAL FINDING SHEET

INSTALLATION: _____

PROTOCOL USED/DATE: _____

SUPPLEMENT USED/DATE (circle one): ACTIVE / RESERVE / GUARD

STATE & LOCAL MANUAL TITLE/DATE: _____

FINDING ID: _____

HOST OR TENANT: _____ FFID# _____

FACILITY ACTIVITY TYPE: _____

MANUAL SECTION NUMBER: _____

FINDING SUMMARY: _____

FINDING DESCRIPTION (Size, Dimension, Number, Amount, etc.):

QUESTION NUMBER: _____ REGULATORY LEVEL: F / S / L / A / O

CRITERIA: _____

POLLUTANT CATEGORY: _____ REASON CODE: _____

FINDING LOCATION: _____

IFS/BUILDING NUMBER: _____

FINDING CATEGORY: 1 / 2 / 3 / H/S FINDING: POS / NEG

EXISTING NOV: Yes/No NOV NUMBER: _____

REPEAT ECAS FINDING: Yes/No IMMEDIATE THREAT: Yes/No

SUGGESTED CORRECTIVE ACTION(S): _____

ROOT CAUSE CODE: _____

COMMENTS: _____

PREPARED BY: _____ DATE: _____

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ORGANIZATION OF THE ACTIVE ARMY SUPPLEMENT

Installations engage in many operations and activities that can cause environmental impacts on public health and the environment if not controlled or properly managed. Many of these activities and operations are regulated by Federal, state, and local regulations, and by Army regulations/policies. After a review of these activities at installations it is apparent that there are major categories of environmental compliance into which most environmental regulations and Army activities could be grouped. This supplement and the TEAM Guide is divided into the following 13 sections that correspond to major compliance categories:

1. Air Emissions Management
2. Cultural Resources Management
3. Hazardous Materials Management
4. Hazardous Waste Management
5. Natural Resource Management
6. Other Environmental Issues
(NEPA, environmental noise, IRP, pollution prevention, program management)
7. Pesticide Management
8. Petroleum, Oil, and Lubricant (POL) Management
9. Solid Waste Management
10. Toxic Substances Management (includes asbestos, PCBs, radon, and lead-based paint)
11. Storage Tank Management
12. Wastewater Management
13. Water Quality Management.

Each section is organized in the following format:

- A. **Army Regulations (ARs) and Policies.** This section identifies the ARs and Army policies that apply to the compliance area.
- B. **Department of Defense (DOD) Directives and Instructions.** This section identifies, in summary form, the key DOD directives and Instructions not yet implemented/superseded by an AR that apply to this compliance category.
- C. **Using the TEAM Guide for ECAS.** This section provides the specifics of how this compliance category in the TEAM Guide will be assessed during ECAS.
- D. **Key Army/DOD Compliance Requirements.** This section summarizes the significant compliance requirements associated with the regulations included in this Supplement. It is a brief abstract summarizing the overall thrust of the regulations for that particular compliance category.
- E. **Key Compliance Personnel.** This section identifies the significant compliance personnel on an installation that are responsible for the requirements outlined in the TEAM Guide and this Supplement.
- F. **Key Army/DOD Compliance Definitions.** This section presents definitions taken from ARs and DOD Directives or Instructions for those key terms associated with each compliance category not already defined by Federal regulations in TEAM Guide.

- G. Records To Review in Addition To Those Listed in TEAM Guide.** This section is a list of records that are specific to Army issues that need to be reviewed in addition to the records listed in TEAM Guide.
- H. Physical Features To Inspect in Addition To Those Listed in TEAM Guide.** This is a list of physical features that are specific to the Army that need to be inspected in addition to the physical features listed in TEAM Guide.
- I. People To Interview.** A list of Army personnel to interview in order to resolve compliance issues related to the requirements discussed in the section.
- J. Compliance Assessment Checklists.** The final portion of each section and its tables contain checklists composed of requirements or guidelines that serve as indicators to point out possible compliance problems, as well as practices, conditions, and situations that could indicate potential problems. They are intended to focus attention on the key compliance questions and issues that should be investigated. Instructions are provided to direct the assessor to the appropriate action, references, or activity that corresponds to the specific requirement or guide.

USING THE ACTIVE ARMY SUPPLEMENT CHECKLISTS

- **Checklist Item Numbering.** The checklist items are each assigned a four part code. The first part of the code indicates the section the checklist item is in (i.e., SO for Solid Waste Management, HW for Hazardous Waste Management). The second part of the code indicates the topic within the section. For example in Solid Waste Management, the first topic is All Installations (SO.1). This second part matches the numbering system used in TEAM Guide and the State Supplements. The third part is a number which indicates the placement of the checklist item within the topic. These checklist item numbers will be kept static from this year to next year. The fourth place indicates the TEAM supplement in which the checklist item is found. The fourth part will be "A" (Active Army) for all items in this supplement. The fourth part in state supplements will be the state postal code, e.g., MD for Maryland.

Topics, in the Active Army or other component supplements, which do not fit in established TEAM topics are placed in a standard topic, Miscellaneous Requirements. This is a standard subsection number 4 in all TEAM sections (e.g., A.4, HW.4, and SO.4).

- **Standard Checklist Items.** The first two checklist items in each section of the supplement are standardized. The first item suggests a list of documents that should be kept on file at the installation. The second item provides for a review of management issues related to the section.
- **Inserting and Deleting Pages.** Each section in the supplement is structured so that, where it is complimentary to checklist items in TEAM Guide, it can be inserted.
- **Missing Checklist Items in TEAM Guide and Supplements (including regulatory and management practice findings).** If you identify a missing requirement in the TEAM Guide or any of its supplements, you should write your own criteria for the left hand column (Regulatory Requirement column) of the checklist and assign it a code using the following pattern: section code.2.your assigned number.supplement code. A standard subsection, or topic, has been established in all sections for missing requirements. Some examples are as follows:
 1. A missing requirement from an Army Regulation in solid waste should be coded SO.2.1.A.
 2. A missing solid waste requirement in a Colorado state supplement would be coded SO.2.1.CO.
 3. The third missing Federal requirement that you find in solid waste would be coded SO.2.3. (no supplement code because it is a Federal TEAM Guide finding.

Missing requirements will be validated at AEC and provided to USACERL to put in the next annual update to the TEAM Guide or supplement. We also plan to place these changes on DENIX at more frequent intervals. Provide copies of all criteria that you add to your team leader, your headquarters, and USAEC.

- **Standard Topics in All Sections.** The following topics (second part of the checklist item code) will be found in all TEAM Guide manual sections:
 1. All Installations: these checklist items are general in nature and apply to all installations.
 2. Missing Requirements: the assessor assigns a code in this subsection for any missing requirement.

3. **State and Local Requirements:** this subsection is only used when the state checklist is not organized in the standard TEAM sections and topics (e.g., when an old ECAS 17 section state protocol is used).
 4. **Miscellaneous Requirements:** this is used only for supplement checklist items, or topics, which do match established TEAM Guide topics.
- **ECAS Software.** The ECAS software is used to prepare the ECAS findings and corrective actions. The software creates a database which is used to prepare ECAS reports to provide the installation a means to followup and manage corrective actions and provide USAEC a means to combine data to use for trend analysis.

The software allows the user to retrieve the text of the regulatory requirement (or criteria) from the TEAM Guide or supplements based on the four part code described above. The TEAM and component supplements (Active, Guard, Reserve) are included in the software. The state protocols are available from USAEC on diskette to add to your ECAS software. Diskettes for all 50 states should be available by the end of 1996.

Training classes are provided for ECAS Software during ECAS training sessions scheduled four times a year and/or on an as-needed basis. Please forward any requests for training to USAEC, ATTN: SFIM-AEC-ECP.

GLOSSARY OF ACTIVE ARMY ACRONYMS

AAFES	Army/Air Force Exchange Service
AASF	Army Aviation Support Facility
ACTS	Army Compliance Tracking System
AMSA	Area Maintenance Support Activities
AR	Army Regulations
ARM	Armory
ARNG	Army National Guard
ARRP	Army Radon Reduction Program
AVCRD	Aviation Classification Repair Activity Depot
AWP	Annual Work Plan
CHEMTREC	Chemical Transportation Emergency Center
CMPA	Compliance Agreement
COE	Corps of Engineers
CONUS	continental U.S.
CPO	Civilian Personnel Office
CSMS	Combined Support Maintenance Shop
CX	Categorical exclusion
DASA	Deputy Assistant Secretary of the Army
DEMIS	Defense Environmental Management Information System
DERA	Defense Environmental Restoration Account
DLA	Defense Logistics Agency
DOC	Directorate of Contracting
DODD	Department of Defense Directive
DODI	Department of Defense Instruction
DODR	Department of Defense Regulation
DOE	Department of Energy
DOL	Directorate of Logistics
DPW	Directorate of Public Works
DPCA	Directorate of Personnel and Community Activities
DPTM	Directorate of Plans, Training, and Mobilization
DRM	Director of Resource Management
DRMO	Defense Reutilization and Marketing Organization
DRMS	Defense Reutilization and Marketing Service
DSH	Directorate of Safety and Health
EC	Environmental Coordinator

ECAS	Environmental Compliance Assessment System
EQCC	Environmental Quality Control Committee
ESDP	established standard, deadline passed
ESMP	Endangered Species Management Plan
ESOH	Environmental Safety and Occupational Health
FEIS	final environmental impact statement
FS	feasibility study
GIS	Geographic Information System
GOCO	government owned, contractor operated
GSA	General Service Administration
HPP	Historic Preservation Plan
HQDA	Headquarters, Department of the Army
IAG	interagency agreement
IAW	in accordance with
IC	Installation Commander
ICUZ	Incompatible Use Zone
IHWMP	Installation Hazardous Waste Management Plan
INOV	inspection/notice of violation
INRMP	Installation Natural Resources Management Plan
IOSC	Installation On-Scene Coordinator
IPMP	Installation Pesticide Management Plan
ISCP	Installations Spill Contingency Plan
ITAM	integrated training area management
LCC	Logistics Control Center
LCED	life cycle environmental document
LFM	liquid fuels maintenance
LLA	lowest living area
LTA	Local Training Area
LTM	long term measurement
MAFI	MWR activities and nonappropriated funds instrumentalities
MATES	Mobilization and Training Equipment Site
MEDCEN	medical center
MEDDAC	Medical Department activity
METL	mission essential task list
MTA	major training area
MWR	Morale, Welfare, and Recreation
NMFS	National Marines Fisheries Service
NSN	National Stock Number

OCPA	Office of the Chief of Public Affairs
OMS	Organizational Maintenance Shop
PA	preliminary assessment
PAS	preliminary assessment screening
PAO	Public Affairs Office
PDEIS	preliminary draft environmental impact statement
PMC	pest management consultant
PMO	preventive medicine officer
PPBES	Programming, Planning, Budget, Execution System
PVNTMED	Preventative Medicine
QAE	quality assurance evaluation
QWRP	qualifying waste recycling program
RA	remedial action
REC	record of environmental consideration
RI	remedial investigation
ROD	record of decision
RPM	remedial project manager
RPMA	real property maintenance activities
SEP	supplemental environmental project
SI	site investigation
SJA	Staff Judge Advocate
SMUs	Solid Waste Management Units
SRT	spill response team
STAARC/HQ	State Area Command/Headquarters
TJAG	The Judge Advocate General
TRC	Technical Review Committee
UFR	Unfinanced Requirements Report
USAEC	U.S. Army Environmental Center
USAF	U.S. Air Force
USCG	U.S. Coast Guard
USPFO	United States Property and Fiscal Office
UTES	Unit Training Equipment Site
WETS	weekend training sites

Major Activities at Army Facilities and Related Sections	
Major Activities/ Operations	Applicable Manual Section
1. Incinerators	A, HW, PO
2. Heat/Power Production	A, WA
3. Fuel Storage	A, HM, HW, PO, ST
4. Sanitary Wastewater	HW, SO, WA
5. Stormwater Runoff	NR, WA
6. Sludge Disposal	HW, SO, WA
7. POL Dispensing	A, HM, PO, ST
8. Wastewater Treatment	WA
9. Vehicle Maintenance	A, HM, HW, PO, SO, ST, WA
10. Shop Activities	A, HM, HW, PM, PO, SO, ST, T2, WA
11. Solid Waste Generation	A, HM, SO, T
12. Drinking Water Supply	HM, SO, WQ
13. Hazardous Materials Use	HM, HW, O4, PM, ST, WA
14. Firefighting Training	A, NR, SO, WA
15. PCB Electrical Equipment	T1
16. Pesticide/Herbicide Use	HM, HW, PM, WA, WQ
17. Environmental Noise	O2
18. Emergency Planning	HM, HW, PM, PO
19. Asbestos Removal	T2
20. Underground Storage Tanks	ST
21. Remodeling Activities	A, C, SO, T2
22. Construction Activities	C, HM, HW, NR, O1, SO, T2
23. Soil Removal	NR, O1, SO, WA

Section 1

Air Emissions Management (Active Army Supplement)

A. U.S. Army Regulations (ARs) and Policies	1
B. Department of Defense (DOD) Directives and Instructions	1
C. Using the TEAM Guide for ECAS	1
D. Key Army/DOD Compliance Requirements	1
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SECTION 1

AIR EMISSIONS MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

- AR 200-1, *Environmental Protection and Enhancement*. Chapter 4 of this AR, dated 23 May 1990, sets forth policy and procedures for controlling pollution emissions into the air. This regulation mandates compliance with all applicable Federal, state, and local regulations concerning air quality, including State Implementation Programs (SIP).

B. Department of Defense (DOD) Directives and Instructions

- DOD Directive (DODD) 6050.9, *Chlorofluorocarbons (CFCs) and Halons*. This directive, dated 13 February 1989, establishes policies for documenting the procurement of CFCs and halons.

C. Using the TEAM Guide for ECAS

- Special emphasis should be placed on evaluating Army/Air Force Exchange Service (AAFES) garages and auto hobby shops for compliance with the CFC and halon requirements.
- When conducting the assessment, use Appendix 1-1 in this Supplement to help the installation identify regulated toxic substances at the installation with threshold quantities for accidental release prevention under 40 CFR 68.130.
- Additionally, Appendix 1-2 provides a list of emissions sources and their projected dates of regulation.

D. Key Army/DOD Compliance Requirements

- Emissions Inventories - The Installation Commander is responsible for the conduct and maintenance of an up-to-date emissions inventory listing all stationary sources of air pollution and inspect stationary air pollution sources periodically.
- Fuel Burning Equipment - All fuel burning facilities will be equipped with air pollution abatement equipment or will use the type of fuel necessary to achieve environmental pollution abatement.
- CFCs and Halons - Installations are required to track the procurement of CFCs and halons.

E. Key Compliance Personnel

- The Installation Commander (IC). The IC is responsible for compliance with air pollution laws and regulations and is the appropriate signatory for all permits.
- The Directorate of Public Works (DPW). The DPW is responsible for the maintenance of incinerators, fuel handling, and storage equipment, as well as the operation and maintenance of all fuel burners. The heating/boiler plant fuel burners are the responsibility of the Operations and Maintenance Division.

- The Environmental Coordinator (EC). The EC is responsible for the preparation of all air pollution emission source permit applications, CFC management, emissions inventories, and emissions monitoring.
- The Hospital or Installation Clinic. These medical services are responsible for the operation of any medical/pathological incinerators located in their facilities.
- The Fuels Management Branch of the Directorate of Logistics (DOL). This branch is responsible for the operation of all fuel handling, transportation (tanks and/or pipelines), and storage facilities on the installation. The branch is also responsible for ensuring that all fuels satisfy specifications, including state mandated sulfur content. The branch is also responsible for the operation of the military service stations that dispenses leaded or unleaded fuel.
- The Vehicle Maintenance Branch of the DOL. This branch is responsible for the emission testing and vehicle maintenance required by state and Army regulations.
- Maintenance Facilities. The various maintenance facilities at the installation are responsible for the operation of degreasers and other industrial processes that are regulated or may require an operating permit.
- AAFES. AAFES operates service stations that dispenses fuel for passenger vehicles and other light duty vehicles. These stations are subject to Federal, state, and local requirements for control of air pollution emissions from fuel storage and dispensing operations, and vehicle maintenance activities.
- The Environmental Management Division of the DPW. This division is responsible for monitoring the ambient air quality and preparing the installation air emissions inventory.

F. Key Army/DOD Compliance Definitions

- *Emission Standards* - limits on the quantity of emissions that may be discharged to the atmosphere from any regulated source, established by Federal, state, local, and host nation authorities (AR 200-1, Glossary, Section II).

G. Records To Review in Addition to Those Listed in TEAM Guide

- Emissions inventory
- Plans and procedures applicable to air pollution control
- Quarterly summary of CFC and halon procurement

H. Physical Features To Inspect in Addition to Those Listed in TEAM Guide

- AAFES Service Stations
- Auto Hobby Shops

I. People To Interview

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Preventive Medicine
- Fuel Management Branch of DOL
- Vehicle Maintenance

J. Guidance for Active Army Air Emissions Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBER:
All Installations	A.1.1.A through A.1.3.A	1-7
CFCs and Halons Purchasing/Procurement	A.85.1.A	1-9

COMPLIANCE CATEGORY:
AIR EMISSIONS MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
ALL INSTALLATIONS A.1 A.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on air emissions, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). A.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).	Verify that copies of the following regulations are available and kept current: - 40 CFR 60, <i>Standards of Performance for New Stationary Sources.</i> - 40 CFR 61, <i>National Emission Standards for Hazardous Air Pollutants.</i> - 40 CFR 80, <i>Regulation of Fuels and Fuel Additives.</i> - 40 CFR 82, <i>Protection of Stratospheric Ozone.</i> - DODD 6050.9, <i>Chlorofluorocarbons (CFCs) and Halons.</i> - AR 40-5, <i>Preventive Medicine.</i> - AR 200-1, <i>Environmental Protection and Enhancement.</i> - TB MED 502, <i>Occupational and Environmental Health: Respiratory Protection Program.</i> - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with air emissions management by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Determine if the installation has a single point-of-contact for air quality issues. Verify that installation environmental policies and regulations are sufficient and fully implemented.

COMPLIANCE CATEGORY:
AIR EMISSIONS MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

**REGULATORY
REQUIREMENTS:**

REVIEWER CHECKS:
May 1995

A.1.3.A. Preventive Medicine personnel at each installation are required to conduct and maintain an up-to-date emissions inventory listing all stationary sources of air pollution and inspect stationary air pollution sources periodically to assess compliance with applicable standards (AR 40-5, para 11-4b and 200-1, para 1-25c(1)).

- Determine whether an emissions inventory has been completed or updated recently.
- Examine the emissions inventory for completeness and compare the inventory to any permits issued to ensure all recent changes/modifications have been included.
- Verify that periodic updates of the air emissions inventory are conducted.
- Verify that Preventive Medicine personnel inspect stationary air sources periodically to assess compliance.
- Determine if all sources of contaminants are accounted for by comparing the site inventory with knowledge gained from a site tour and field work.
- Verify that the listing includes an inventory of VOCs and hazardous air pollutants.

COMPLIANCE CATEGORY:
AIR EMISSIONS MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
CFCs AND HALONS A.85 Purchasing/ Procurement A.85.1.A. Installations that procure and store CFCs and halons for mission critical applications when substitutes are not available, or use them to service equipment, are required to produce a quarterly summary of CFC and halon procurement so that the Army can submit the annual CFC and Halon Report to the Assistant Secretary of Defense (DODD 6050.9, para E3(f)).	Determine if the summary of CFC and halon procurement has been completed. Verify that the form indicates the following: - aggregate procurement (by 1000 lb) of CFCs and halons for which they are the integrated item manager - data on significant noncentralized CFC and halon procurement. Verify that, in areas where CFCs and halons are used or stored, the following is being done: - dependences on CFCs and halons is reduced - emissions are being minimized - conservation practices have been implemented. Verify that procurement data is gathered quarterly.

Appendix 1-1

List of Regulated Toxic Substances and Threshold Quantities for Accidental Release Prevention (40 CFR 68.130, Table 1)

Chemical name	CAS No.	Threshold quantity (lb)	Basis for listing
Acrolein [2-Propenal]	107-02-8	5000	b
Acrylonitrile [2-Propenenitrile]	107-13-1	20,000	b
Acrylyl chloride [2-Propenoyl chloride]	814-68-6	5000	b
Allyl alcohol [2-Propen-1-ol]	107-18-61	15,000	b
Allylamine [2-Propen-1-amine]	107-11-9	10,000	b
Ammonia (anhydrous)	7664-41-7	10,000	a,b
Ammonia (conc 20% or greater)	7664-41-7	20,000	a,b
Arsenous trichloride	7784-34-1	15,000	b
Arsine	7784-42-1	1000	b
Boron trichloride [Borane, trichloro-]	10294-34-5	5000	b
Boron trifluoride [Borane, trifluoro-]	7637-07-2	5000	b
Boron trifluoride compound with methyl ether (1:1) [Boron, trifluoro[oxybis[metane]]-, T-4-	353-42-4	15,000	b
Bromine	7726-95-6	10,000	a,b
Carbon disulfide	75-15-0	20,000	b
Chlorine	7782-50-5	2500	a,b
Chlorine dioxide [Chlorine oxide (ClO ₂)]	10049-04-4	1000	c
Chloroform [Methane, trichloro-]	67-66-3	20,000	b
Chloromethyl ether [Methane, oxybis[chloro-]	542-88-1	1000	b
Chloromethyl methyl ether [Methane, chloromethoxy-]	107-30-2	5000	b
Crotonaldehyde [2-Butenal]	4170-30-3	20,000	b
Crotonaldehyde, (E)- [2-Butenal, (E)-]	123-73-9	20,000	b
Cyanogen chloride	506-77-4	10,000	c
Cyclohexylamine [Cyclohexanamine]	108-91-8	15,000	b
Diborane	19287-45-7	2500	b
Dimethyldichlorosilane [Silane, dichlorodimethyl-]	75-78-5	5000	b

The mixture exemption in 68.115(b)(1) does not apply to the substance.

(continued)

Appendix 1-1 (continued)

Chemical name	CAS No.	Threshold quantity (lb)	Basis for listing
1,1-Dimethylhydrazine [Hydrazine, 1,1-dimethyl-]	57-14-7	15,000	b
Epichlorohydrin [Oxirane, (chloromethyl)-]	106-89-8	20,000	b
Ethylenediamine [1,2-Ethanediamine]	107-15-3	20,000	b
Ethyleneimine [Aziridine]	151-56-4	10,000	b
Ethylene oxide [Oxirane]	75-21-8	10,000	a,b
Fluorine	7782-41-4	1000	b
Formaldehyde (solution)	50-00-0	15,000	b
Furan	110-00-9	5000	b
Hydrazine	302-01-2	15,000	b
Hydrochloric acid (conc 30% or greater)	7647-01-1	15,000	d
Hydrocyanic acid	74-90-8	2500	a,b
Hydrogen chloride (anhydrous) [Hydrochloric acid]	7647-01-1	5000	a
Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]	7664-39-3	1000	a,b
Hydrogen selenide	7783-07-5	500	b
Hydrogen sulfide	7783-06-4	10,000	a,b
Iron, pentacarbonyl- [Iron carbonyl (Fe(CO) ₅), (TB-5-11)-]	13463-40-6	2500	b
Isobutyronitrile [Propanenitrile, 2-methyl-]	78-82-0	20,000	b
Isopropyl chloroformate [Carbonochloridic acid, 1-methylethyl ester]	108-23-6	15,000	b
Methacrylonitrile [2-Propenenitrile, 2-methyl-]	126-98-7	10,000	b
Methyl chloride [Methane, chloro-]	74-87-3	10,000	a
Methyl chloroformate [Carbonochloridic acid, methylester]	79-22-1	5000	b
Methyl hydrazine [Hydrazine, methyl-]	60-34-4	15,000	b
Methyl isocyanate [Methane, isocyanato-]	624-83-9	10,000	a,b
Methyl mercaptan [Methanethiol]	74-93-1	10,000	b
Methyl thiocyanate [Thiocyanic acid, methyl ester]	556-64-9	20,000	b
Methyltrichlorosilane [Silane, trichloromethyl-]	75-79-6	5000	b
Nichel carbonyl	13463-39-3	1000	b
Nitric acid (conc 80% or greater)	7697-37-2	15,000	b
Nitric oxide [Nitrogen oxide (NO)]	10102-43-9	10,000	b
¹ The mixture exemption in 68.115(b)(1) does not apply to the substance.			

(continued)

Appendix 1-1 (continued)

Chemical name	CAS No.	Threshold quantity (lb)	Basis for listing
Oleum Fuming Sulfuric acid) [Sulfuric acid, mixture with sulfur trioxide] ¹	8014-95-7	10,000	e
Peracetic acid [Ethaneperoxoic acid]	79-21-0	10,000	b
Perchloromethylmercaptan [Methanesulphenyl chloride, trichloro-]	594-42-3	10,000	b
Phosgene [Carbonyl dichloride]	75-44-5	500	a,b
Phosphine	7803-51-2	5000	b
Phosphorus oxychloride [Phosphoryl chloride]	10025-87-3	5000	b
Phosphorus trichloride [Phosphorous trichloride]	7719-12-2	15,000	b
Piperidine	110-89-4	15,000	b
Propionitrile [Propanenitrile]	107-12-0	10,000	b
Propyl chloroformate [Carbonochloridic acid, propylester]	109-61-5	15,000	b
Propylaneimine [Aziridine, 2-methyl-]	75-55-8	10,000	b
Propylene oxide [Oxirane, methyl-]	75-56-9	5000	b
Sulfur dioxide (anhydrous)	7446-09-5	5000	a,b
Sulfur tetrafluoride [sulfur fluoride (SF ₄), (T-4)-]	7783-60-0	2500	b
Sulfur trioxide	7446-11-9	10,000	a,b
Tetramethyllead [Plumbane, tetramethyl-]	75-74-1	10,000	b
Tetranitromethane [Methane, tetranitro-]	509-14-8	10,000	b
Titanium tetrachloride [Titanium chloride (TiCl ₄) (T-4)-]	7550-45-0	2500	b
Toluene 2,4-diisocyanate [Benzene, 2,4-diisocyanato-1-methyl-]1	584-84-9	10,000	a
Toluene 2,6-diisocyanate [Benzene, 1,3-diisocyanato-2-methyl-]1	91-06-7	10,000	a
Toluene diisocyanate (unspecified isomer) [Benzene, 1,3-diisocyanatomethyl-]1	26471-62-5	10,000	a
Trimethylchlorosilane [Silane, chlorotrimethyl-]	75-77-4	10,000	b
Vinyl acetate monomer [Acetic acid ethenyl ester]	108-05-4	15,000	b

NOTE: Basis for Listing:

- a Mandated for listing by Congress.
- b On EHS list, vapor pressure 10 mmHg or greater.
- c Toxic gas.
- d Toxicity of hydrogen chloride, potential to release hydrogen chloride, and history of accidents.
- e Toxicity of sulfur trioxide and sulfuric acid, potential to release sulfur trioxide, and history of accidents.

¹The mixture exemption in 68.115(b)(1) does not apply to the substance.

(continued)

Appendix 1-1 (continued)

Table 3 to 68.130 -- List of Regulated Flammable Substances and Threshold Quantities for Accidental Release Prevention

Chemical name	CAS No.	Threshold quantity (lbs)	Basis for listing
Acetaldehyde	75-07-0	10,000	g
Acetylene [Ethyne]	74-86-2	10,000	f
Bromotrifluoroethylene [Ethene, bromotrifluoro-]	598-73-2	10,000	f
1,3-Butadiene	106-99-0	10,000	f
Butane	106-97-8	10,000	f
1-Butene	106-98-9	10,000	f
2-Butene	107-01-7	10,000	f
Butene	25167-67-3	10,000	f
2-Butene-cis	590-18-1	10,000	f
2-Butene-trans [2-Butene, (E)]	624-64-6	10,000	f
Carbon oxysulfide [Carbon oxide sulfide (COS)]	463-58-1	10,000	f
Chlorine monoxide [Chlorine oxide]	7791-21-1	10,000	f
2-Chloropropylene [1-Propene, 2-chloro-]	557-98-2	10,000	g
1-Chloropropylene [1-Propene, 1-chloro-]	590-21-6	10,000	g
Cyanogen [Ethanedinitrile]	460-19-5	10,000	f
Cyclopropane	75-19-4	10,000	f
Dichlorosilane [Silane, dichloro-]	4109-96-0	10,000	f
Difluoroethane [Ethane, 1,1-difluoro-]	75-37-6	10,000	f
Dimethylamine [Methanamine, N-methyl-]	124-40-3	10,000	f
2,2-dimethylpropane [Propane, 2,2-dimethyl-]	463-82-1	10,000	f
Ethane	74-84-0	10,000	f
Ethyl acetylene [1-Butyne]	107-00-6	10,000	f
Ethylamine [Ethanamine]	75-04-7	10,000	f
Ethyl chloride [Ethane, chloro-]	75-00-3	10,000	f
Ethylene [Ethene]	74-85-1	10,000	f
Ethyl ether [Ethane, 1,1'-oxybis-]	60-29-7	10,000	g
Ethyl mercaptan [Ethanethiol]	75-08-1	10,000	g
Ethyl nitrite [Nitrous acid, ethyl ester]	109-95-5	10,000	f

(continued)

Appendix 1-1 (continued)

Chemical name	CAS No.	Threshold quantity (lbs)	Basis for listing
Hydrogen	1333-74-0	10,000	f
Isobutane [Propane, 2-methyl]	75-28-5	10,000	f
Isopentane [Butane, 2-methyl-]	78-78-4	10,000	g
Isoprene [1,3-Butadiene, 2-methyl-]	78-79-5	10,000	g
Isopropylamine [2-Propanamine]	75-31-0	10,000	g
Isopropyl chloride [Propane, 2-chloro-]	75-29-6	10,000	g
Methane	74-82-8	10,000	f
Methylamine [Methanamine]	74-89-5	10,000	f
3-Methyl-1-butene	563-45-1	10,000	f
2-Methyl-1-butene	563-46-2	10,000	g
Methyl ether [Methane, oxybis-]	115-10-6	10,000	f
Methyl formate [Formic acid, methyl ester]	107-31-3	10,000	g
2-Methylpropene [1-Propene, 2-methyl-]	115-11-7	10,000	f
Pentadienene	504-60-9	10,000	f
Pentane	109-66-0	10,000	g
1-Pentene	109-67-1	10,000	g
2-Pentene, (E)-	646-04-8	10,000	g
2-Pentene, (Z)-	627-20-3	10,000	g
Propadiene [1,2-Propadiene]	463-49-0	10,000	f
Propane	74-98-6	10,000	f
Propylene [1-Propene]	115-07-1	10,000	f
Propyne [1-Propyne]	74-99-7	10,000	f
Silane	7803-62-5	10,000	f
Tetrafluoroethylene [Ethene, tetrafluoro-]	116-14-3	10,000	f
Tetramethylsilane [Silane, tetramethyl-]	75-76-3	10,000	g
Trichlorosilane [Silane, trichloro-]	10025-78-2	10,000	g
Trifluorochloroethylene [Ethene, chlorotrifluoro-]	79-38-9	10,000	f
Trimethylamine [Methanamine, N,N-dimethyl-]	75-50-3	10,000	f
1-Butyne [1-Buten-3-yne]	689-97-4	10,000	f
Vinyl chloride [Ethene, chloro-]	75-01-4	10,000	a,f

(continued)

Appendix 1-1 (continued)

Chemical name	CAS No.	Threshold quantity (lbs)	Basis for listing
Vinyl ethyl ether [Ethene, ethoxy-]	109-92-2	10,000	g
Vinyl fluoride [Ethene, fluoro-]	75-02-5	10,000	f
Vinylidene chloride [Ethene, 1,1-dichloro-]	75-35-4	10,000	g
Vinylidene fluoride [Ethene, 1,1-difluoro-]	75-38-7	10,000	f
Vinyl methyl ether [Ethene, methoxy-]	107-25-5	10,000	f
NOTE: Basis for Listing: a Mandated for listing by Congress. f Flammable gas. g Volatile flammable liquid.			

Appendix 1-2

MACT, CTG, NSPS, ACT, and Title I Rule Schedules **

MACT Standard	Proposed	Final
Aerospace (coating)	7/31/94*	7/31/95
Asbestos MACT/GACT	1/95*****	11/95*****
Asbestos Litigation	1/01/93*	***
Benzene Waste NECHAP Lit.	3/05/92*	1/07/93*
Chromium electroplating	11/30/93*	11/23/94
Coke Ovens	12/04/92*	10/27/93*
Commercial Sterilizers	2/28/94*	11/23/94
Degreasing (Hal. Sol. Clean.)	11/29/93*	11/15/94
Dry Cleaning	12/09/91*	9/22/93*
Haz Organic NESHAP (HON)	12/31/92*	2/28/94*
Haz Waste TSDF (phase 1)	7/22/91*	10/04/94
Haz Waste TSDF (phase 2)	schedule under revision	
Ind. Cooling Towers	8/12/93*	7/22/94
Magnetic Tape coating	2/28/94*	11/23/94
Marine Vessels (load/unload)	5/13/94*	4/30/95
Offsite Waste Operators	10/01/94	10/15/94
Petroleum Refineries	6/30/94*	6/30/95
Polymers and Resins I	schedule under revision	
Polymers and Resins II	5/16/94*	2/28/95
Polymers and Resins III	schedule under revision	
Polymers and Resins IV	3/15/95	3/15/96
Pulp and Paper (combustion)	2/27/95	4/29/96
Pulp and Paper (noncombustion)	10/29/93*	3/01/96
Secondary Lead Smelters	5/31/94*	5/31/95
Shipbuilding (coatings)	1/15/95	11/15/95
Stage 1 Gasoline Distribution	2/08/94*	1/23/94
Wood Furniture Coating	under regulatory negotiation	

(continued)

Appendix 1-2 (continued)

CTG	Proposed	Final
Aerospace Coatings	11/15/94	1/31/95
Industrial Wastewater	12/29/93*	on hold
Offset Lithography	11/08/93*	on hold
Plastic Parts Coatings	1/31/94*	on hold
Shipbuilding (coatings)	schedule under review	
Batch Processes	12/27/93*	on hold
SOCMI Dist. and Reactors	12/12/01*	8/15/93*
VOL Storage	12/02/93*	on hold
Wood Furniture Coating	under regulatory negotiation	
ACT	Final	
Bakeries (VOC/O-HAPS)	12/31/92*	
Carbon Regeneration (VOC/O-HAPS)	12/31/92*	
Gas Turbines (NO _x)	11/20/92*	
Cement Manufacturing (NO _x)	1/28/94*	
Glass Manufacturing (NO _x)	4/29/94	
IC Engine (NO _x)	7/28/93*	
Industrial Boilers (NO _x)	3/30/94*	
Industrial Cleanup Solvents	2/22/94*	
Iron and Steel (NO _x)	9/94	
Nitric/Adipic Acid (NO _x)	11/18/91*	
Pesticide Application	3/31/93*	
Plywood/Particle Board (PM10)	schedule under development	
Process Heaters (NO _x)	2/26/93*	
Utility Boilers (NO _x)	3/25/94*	
NSPS	Proposed	Final
Degreaser NSPS	8/31/94	8/31/95
Elec. Utility Gen. Rev. (NO _x)	5/30/94*	4/30/95
Landfill, NSPS and 111(d)	5/30/91*	10/15/94
Med. Waste Incin. NSPS and 111(d)	2/01/95	4/115/96

(continued)

Appendix 1-2 (continued)

Mun. Waste Comb. II and III	5/94	
NO _x NSPS Revision (407(c))	8/30/94**	on hold
SO ₂ NSPS Revision	canceled	
SOCMI Reactor NSPS	6/29/90*	8/31/93*
SOCMI Sec. Sources NSPS	8/31/94	8/31/95
Starch MFG. Industry NSPS	8/31/94	8/31/95
Title I Rules (Sec 183(e))	Proposed	Final
Arch/Industrial Coatings	under regulatory negotiation	
Auto Refinishing	schedule under development	
Consumer Products List	8/31/94	9/30/95

* = Indicates date completed.

** = All schedules are tentative and subject to change without notice.

*** = Schedule to be determined by litigation/negotiation.

**** = ACT's will be issued for most CTG categories by April 1994.

***** = Indicates on a court ordered deadline.

Section 2

Cultural Resources Management (Active Army Supplement)

A. U.S. Army Regulations (ARs) and Policies	1
B. Department of Defense (DOD) Directives and Instructions	1
C. Using the TEAM Guide for ECAS	1
D. Key Army/DOD Compliance Requirements	1
E. Key Compliance Personnel	1
F. Key Army Compliance Definitions	2
G. Records To Review in Addition To Those Listed in TEAM Guide	2
H. Physical Features To Inspect in Addition To those Listed in TEAM Guide	2
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J. Guidance for Cultural Resources Management Checklist Users	3

SECTION 2

CULTURAL RESOURCES MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

- AR 420-40, *Historic Preservation*. This AR, dated 15 May 1984, provides policy and regulatory guidance on historic preservation. It establishes the Army's goals to protect buildings, structures, sites, and objects of historical, architectural, archaeological, or cultural value located on Army-controlled property, as required by the *National Historic Preservation Act* (NHPA), *Archaeological Resources Protection Act* (ARPA), and other laws. It contains definitions of pertinent terms and descriptions of compliance procedures.

B. Department of Defense (DOD) Directives and Instructions

- DOD Directive (DODD) 4710.1, *Archaeological and Historic Resources Management*. This directive, dated 21 June 1984, provides policy, prescribes procedures, and assigns responsibilities for the management of archaeological and historic resources located in and on water and land under DOD control. It establishes the policy that DOD components will integrate the archaeological and historical preservation requirements of applicable laws with the planning and management of activities under DOD control.

C. Using the TEAM Guide for ECAS

- Use Version 1 of the checklist when conducting ECAS assessments.
- When Native American remains, funerary objects, or other cultural items are discovered, the Secretary of the Army is to be notified.

D. Key Army/DOD Compliance Requirements

- Historic Preservation Plan (HPP) - Army installations with historic properties are required to develop an HPP that ensures compliance with these applicable regulations and standards.

E. Key Compliance Personnel

- The Installation Commander (IC) is responsible for funding historic preservation programs through the Command Operating Budget (COB).
- The Directorate of Public Works (DPW) is responsible for supervising, controlling, and managing installation historic preservation programs.

- The Installation Historic Preservation Officer (IHPO) is responsible for implementing the historic preservation program, training installation personnel, and locating, inventorying, and evaluating installation cultural resources. Along with the State Historic Preservation Officer (SHPO), the IHPO negotiates the Memoranda of Agreement (MOA) with the SHPO, which contain detailed descriptions (programmatics) of specific preservation actions, and ensures that all provisions of the agreement are met.

F. Key Army Compliance Definitions

- *Significant* - having a characteristic that makes a property eligible for listing on the National Register (DOD Directive 4710.0).

G. Records To Review in Addition To Those Listed in TEAM Guide

- Installation Master Plan
- Historic Preservation Plan (HPP)
- Archaeological site forms and maps
- *National Environmental Policy Act* (NEPA) mitigation plans
- For construction (including maintenance, demolition, rehabilitation, etc.) activities: documentation of finding of no adverse effect, finding of adverse effect, Memorandum of Agreement (MOA) with the SHPO, or requests for comment when there is no agreement on historic properties
- Nominations to National Register
- Correspondence with SHPO for consensus determinations of eligibility; determinations of no effect no adverse effect, and adverse effect
- Standing Operating Procedures (SOPs) for ensuring compliance
- MOA and Programmatic Memoranda
- ARPA permits
- Curation inventories and bailment agreements
- Inventory of historic properties
- Cultural resources reports, contracts, and scopes of work

H. Physical Features To Inspect in Addition To Those Listed in TEAM Guide

- Sites of historic, archaeological, or Native American interest (designation, protection, and interpretation)
- Repositories of archaeological records and collections
- Buildings and structures of potential historical significance (national, state, or local)

I. People To Interview

- Installation Historic Preservation Officer (IHPO)
- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Director of Plans, Training, Mobilization, and Security (DPTMSEC)
- Public Affairs Office (PAO)
- Master Planner (DPW)

J. Guidance for Active Army Cultural Resources Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBER:
All Installations	C.1.1.A and C.1.2.A	2-5
Historic Properties	C.5.1.A	2-7

COMPLIANCE CATEGORY:
CULTURAL RESOURCES MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
C.1 ALL INSTALLATIONS C.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on cultural resources, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). C.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).	Verify that the following documents, which are applicable, are maintained and kept current at the installation: - 32 CFR 229, <i>Protection of Archaeological Resources: Uniform Regulations.</i> - 36 CFR 79, <i>Curation of Federally-Owned and Administered Archaeological Collections.</i> - 36 CFR 800, <i>Protection of Historic and Cultural Properties.</i> - 36 CFR 1222-1238, <i>Records Management.</i> - AR 420-40, <i>Historic Preservation.</i> - PL 101-601, <i>Native American Graves Protection and Repatriation Act.</i> - 16 USC 470ii, <i>Conservation - Archaeological Resources Protection - Rules and Regulations/Intergovernmental Coordination.</i> - 25 USC 3001, <i>Native American Graves Protection and Repatriation - Definitions.</i> - <i>National Environmental Policy Act (NEPA).</i> - <i>National Historic Preservation Act (NHPA).</i> - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with historic and cultural resources by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented.

**COMPLIANCE CATEGORY:
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U.S. TEAM Guide: Active Army Supplement**

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
C.5 HISTORIC PROPERTIES C.5.1.A. Installations with historic properties are required to prepare and implement an HPP to guide their management. This may be integrated into a Cultural Resources Management Plan (CRMP) that addresses a broader subset of, or all, cultural resources (AR 420-40).	Verify that the facility has either: - elected not to prepare an HPP or CRMP, as evidenced by a decision memorandum signed by the commander - negotiated a Programmatic Agreement (PA) with the SHPO, Advisory Council on Historic Preservation (ACHP), and other interested parties stipulating the content and nature of the HPP or CRMP, as evidenced by correspondence on the subject - completed a PA and is preparing an HPP or CRMP as evidenced by a copy of the PA and documents associated with HPP/CRMP preparation - an HPP or CRMP in place that: - has been reviewed by the SHPO and ACHP in accordance with the applicable PA, as evidenced by documents signed by SHPO and ACHP representatives - is being implemented, as evidenced by implementation schedules, plans, budget documents, and other written material - is coordinated with Master Planning, Range Control, Integrated Training Area Management (ITAM), and other planning activities, as evidenced by references to the HPP or CRMP in documents guiding implementation of such activities, or by computer-based or other demonstrable systems of coordination - has a definite schedule for review and updating, as evidenced by documents or other provisions contained in the HPP or CRMP, in the PA, or elsewhere providing for such review and updating.

Section 3

Hazardous Materials Management (Active Army Supplement)

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SECTION 3

HAZARDOUS MATERIALS MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

- AR 200-1, *Environmental Protection and Enhancement*. This AR, dated 23 May 1990, addresses management of the environment. Chapter 5, *Hazardous Material Management Program*, implements the Army program to minimize hazards to public health and damage to the environment. It provides guidance for the management of hazardous materials including storage and disposal.

B. Department of Defense (DOD) Directives and Instructions

- DOD Directive (DODD) 6050.8, *Storage and Disposal of Non-DOD-Owned Hazardous or Toxic Materials on DOD Installations*. This directive, dated 27 February 1986, prohibits the storage of non-DOD hazardous materials on DOD installations.

C. Using the TEAM Guide For ECAS

- According to the memorandum titled *Review Comments on the Army Supplement to The Environmental Assessment and Management (TEAM) Guide*, dated 27 February 1995, no checklist items in the Hazardous Materials Management section will be ignored. But, emphasis should be placed on checklist items which contribute to a well managed hazardous material/hazardous waste program and can be related to an environmental issue.

D. Key Army/DOD Compliance Requirements

- Hazardous Materials Training - Personnel who handle hazardous materials are required to be trained in the safe handling and management of the materials they work with routinely.
- Master List - A master listing of all hazardous substances at handling, storage, and transfer facilities is required as a part of the Spill Prevention, Control, and Countermeasure (SPCC) Plan.
- Waste Minimization - Hazardous material management is to be considered an integral part of the Army Hazardous Waste Minimization Program. Installations are required to have an Army Hazardous Waste Minimization Program.
- Spill Reporting - Any spill of a hazardous substance must be reported to the Installation On-Scene Coordinator (IOSC) immediately.

E. Key Compliance Personnel

- Director of Logistics (DOL) has primary responsibility to receive, store, and issue all hazardous commodities. DOL reviews all items that have a potential health hazard and determines if an issue exception code (IEC) should be assigned to the item before being placed in storage. The receipt of hazardous materials with the proper documentation and shipping papers is also the responsibility of

DOL. The proper maintenance and operation of flammable/combustible materials storage facilities, acid storage facilities, and compressed gas storage facilities is also the responsibility of DOL. DOL ensures all hazardous materials are properly labeled.

- Medical Department Activity (MEDDAC)/Medical Center (MEDCEN) is responsible for reviewing the IECs for hazardous materials assigned by DOL, and approving or disapproving the recommendations.
- Directorate of Public Works (DPW) is responsible for the storage and handling of all hazardous materials in properly designed facilities. DPW is also responsible for reporting releases of reportable quantities of hazardous substances to U.S. Environmental Protection Agency (USEPA) and appropriate state authorities.
- Installation Fire Department provides support in emergency response, spill events, exercises, and fire protection activities. In addition, the department is responsible for making periodic fire safety inspections of flammable/combustible storage and handling areas on the installation.
- Safety Officer is responsible for conducting work place safety evaluations and inspections of the handling and storage of hazardous materials. The Safety Officer provides the appropriate manager with a report of findings and recommended corrective actions. The Safety Officer is also responsible for ensuring the prompt and accurate investigation of any hazardous material mishaps that result in injury or property damage.

F. Key Army/DOD Compliance Definitions

- *Hazardous or Toxic Materials* - materials defined in section 101 of the *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA) or that are of an explosive, flammable, or pyrotechnic nature (DODD 6050.8, Section C).
- *Personnel Training* - training to meet the requirements of all applicable regulations. This level of training ensures a high level of competency in performing within a given job description (AR 200-1, Glossary).
- *Waste Minimization* - any source reduction or recycling activity that is undertaken by a generator that results in the reduction of hazardous waste or the reduction in toxicity of hazardous waste that is either generated or subsequently treated, stored, or disposed of (AR 200-1, Glossary).

G. Records To Review in Addition To Those Listed in TEAM Guide

- Hazardous Material Inventory
- The OHSCP

H. Physical Features To Inspect in Addition To Those Listed in TEAM Guide

- Hazardous Material Storage Areas (DOL - Supply, Shops)
- Shipping and Receiving Areas
- Supply and Storage Shops (DPW, DOL)
- Self Service Supply Center (DOL)
- Military Unit Supply/Storage Areas

I. People To Interview

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Director of Logistics (DOL)
- Fuels Management Officer (DOL/DPW)
- Transportation/Maintenance Officer (DOL)
- Chief of Operations and Maintenance (O&M)

J. Guidance for Active Army Hazardous Materials Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBER:
All Installations	HM.1.1.A through HM.1.4.A	3-7
Releases of Hazardous Materials	HM.20.1.A	3-9

COMPLIANCE CATEGORY:
HAZARDOUS MATERIALS MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
HM.1 ALL INSTALLATIONS HM.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on hazardous materials management, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). HM.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP). HM.1.3.A. The installation should coordinate with the fire department concerning the types of hazardous chemicals used at the installation, the areas where they are used, what they are used for, and the quantities used in a given operation (MP).	Verify that the following documents, which are applicable, are maintained and kept current at the installation. - 40 CFR 112, <i>Oil Pollution Prevention</i>. - EO 12088, <i>Federal Compliance with Pollution Standards</i>. - DODD 6050.8, <i>Storage and Disposal of Non-DOD Owned Hazardous or Toxic Materials in DOD installations</i>. - AR 200-1, <i>Environmental Protection and Enhancement</i>. - NFPA, <i>Fire Protection Guide of Hazardous Materials</i>. - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with hazardous materials by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented. Verify that the fire department is aware of the hazardous chemicals used at the installation. Verify that the fire department is aware of areas that are at high risk for chemical incidents.

**COMPLIANCE CATEGORY:
HAZARDOUS MATERIALS MANAGEMENT
U.S. TEAM Guide: Active Army Supplement**

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
HM.1.4.A. Installations may not allow the storage of non-DOD-owned toxic or hazardous materials onsite (DODD 6050.8, para D, AR 200-1, para 5-4).	Verify that the installation does not allow the storage of non-DOD-owned toxic or hazardous materials onsite. (NOTE: This does not apply to: - agreements with General Services Administration (GSA) for the storage of strategic and critical materials in the National Stockpile Program - agreements between DOD Components and other Federal agencies for temporary storage or disposal of explosives - emergency lifesaving assistance to civil authorities involving the temporary storage or disposal of explosives - excess explosive generated under a DOD contract - arrangements with the Department of Energy (DOE) for the temporary storage of nuclear materials or non-nuclear classified materials - military resources used during peacetime civil emergencies - assistance and refuge for commercial carriers carrying material of other Federal agencies during transportation emergencies.)

COMPLIANCE CATEGORY:
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**REGULATORY
REQUIREMENTS:**

**HM.20
RELEASES OF
HAZARDOUS
MATERIALS**

HM.20.1.A. Any spill of a hazardous substance must be reported to the IOSC immediately (AR 200-1, para 8-3(a)).

REVIEWER CHECKS:
May 1995

Verify that spills of hazardous substances have been reported to the IOSC.

Section 4

Hazardous Waste Management (Active Army Supplement)

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SECTION 4

HAZARDOUS WASTE MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

- AR 200-1, *Environmental Protection and Enhancement*. This AR is dated 23 May 1990. Chapter 6 defines Army policy and procedures for managing hazardous waste, including resource recovery, recycling, waste reduction, and training programs.

The hazardous waste management program requirements of AR 200-1 are that Army, U.S. Army Reserve (USAR), and Army National Guard (ARNG) installations and tenants will be aware of and comply with all applicable laws (Federal, state, and local); ensure that program and budget requests identify resource requirements to carry out management duties; encourage the use of joint or regional facilities to minimize costs; minimize generation and land disposal of hazardous wastes; prohibit the storage of hazardous wastes in underground storage tanks (USTs); conform to all laws, including international laws, on ocean dumping; and in general, "generate, transport, treat, store, and dispose of wastes such as pesticides, hazardous chemical stocks, medical, dental, and veterinary supplies, radioactive materials, and propellant, explosive, and pyrotechnic (PEP) materials, explosive ordnance, or chemical warfare agents in a manner that protects public health and the environment" (para 6-2).

B. Department of Defense (DOD) Directives and Instructions

- All applicable directives and instructions have previously been implemented by ARs.

C. Using The TEAM Guide for ECAS

- When assessing an installation with a Defense Reutilization and Marketing Organization (DRMO) onsite, assess the DRMO.
- Review the Hazardous Waste Management Plan for a list of accumulation points and identify those accumulation points active at the installation that are not listed in the plan.
- The RCRA Hazardous Waste Minimization plan may be incorporated into the Pollution Prevention Plan.

D. Key Army/DOD Compliance Requirements

- Installation Hazardous Waste Management Plan (IHWMP) - Each Installation Commander (IC) will ensure that a written hazardous waste management plan is maintained to provide installation personnel with procedures and responsibilities to manage hazardous wastes consistent with all applicable laws and regulations. The Directorate of Public Works (DPW) will prepare the plan and provide copies to all facility personnel that generate, transport, treat, store, and dispose of hazardous waste. The plan will be signed by the IC and will:
 1. include responsibilities of installation organizations and personnel in generating, treating, storing, and disposing of hazardous waste

2. show a U.S. Environmental Protection Agency (USEPA) and state identification number to generate, treat, store, dispose of, transport, or offer for transportation hazardous wastes
3. specify the type and quantity of hazardous waste for each hazardous waste generating activity (including tenants)
4. describe waste minimization projects, funds, and saving
5. identify the location of all hazardous waste treatment, storage, or disposal facilities (TSDFs)
6. describe installation procedures to treat, store, dispose of, transport onpost, or offer for transport offpost hazardous waste, consistent with the requirements of 40 CFR 260 through 40 CFR 271, including requirements of a *Resource Conservation Recovery Act* (RCRA) permit
7. include procedures to analyze hazardous wastes
8. include procedures to inspect the hazardous waste units for malfunction and deterioration, operator errors, and discharges that may be causing, or may lead to release of hazardous waste constituents to the environment, or a threat to human health
9. include procedures to prevent unauthorized entry to the hazardous waste units
10. describe the program to train all applicable facility personnel with Federal, state, and Army requirements to ensure compliance with RCRA
11. include procedures of the contingency plan to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, consistent with requirements of 40 CFR 264, Subpart D
12. include procedures to temporarily treat, store, and dispose of hazardous waste if the use of existing facilities is unavailable, identifying temporary storage facilities, alternate disposal site, and handling procedures
13. include a copy of the RCRA operating record, if applicable
14. include a copy of the RCRA permit, if applicable
15. reference the location of the Spill Prevention, Control, and Countermeasure (SPCC) Plan and the Installation Spill Contingency Plan (ISCP), and summarize emergency reporting information for reporting and containing spills and illegal dumping
16. include references for obtaining technical information on determining if a waste is hazardous; the location of offsite RCRA approved TSDFs; the names of state and Federally approved hazardous waste transporters; and the names and addresses of state and Federal regulatory agencies administering the RCRA program.

E. Key Compliance Personnel

- The IC - The IC is responsible for establishing and maintaining an active program of surveillance of the users of hazardous materials; generators, transporters, and storers of hazardous wastes; the waste minimization program; and disposal activities. By DOD direction, the IC is responsible for compliance with RCRA and state regulations involving host and tenant organizations on the installation. The commander signs all permit applications and reports submitted to the USEPA or state agencies as part of this overall management responsibility. In the event that the IC is not a Colonel or higher or commands less than 250 persons, RCRA permit applications must be referred up the chain of command to an official in the grade of Colonel or higher for signature. In either case, operational responsibility for the hazardous waste program rests with the activities that generate, treat, store, transport, or dispose of the waste in accordance with guidance and direction provided by the activities responsible for implementing health, safety, and environmental protection programs.
- DPW and Directorate of Safety and Health (DSH) - The DPW/DSH will serve as the IC's expert representative for the management of all wastes, unless otherwise directed by the IC.

In the area of compliance, the DPW/DSH will immediately advise the IC on the receipt of enforcement notices, such as notices of violation (NOVs), consent orders, or RCRA compliance agreements; advise all waste generating activities on state, Federal, host nation, and Army requirements for managing hazardous waste, including requirements for permits and reporting and recordkeeping; prepare all required reports on hazardous waste, including the biennial report (USEPA Form 8700-13A), the A-106 report (see Section 5, Other Environmental Issues), and the annual hazardous waste report; monitor installation compliance with Federal, state, local, and host nation hazardous waste requirements, including activities of tenants and subinstallations; prepare and monitor compliance with the hazardous waste management plan that establishes procedures and responsibilities for managing hazardous wastes.

In the area of waste management (including disposal), the DPW/DSH will advise the IC, in coordination with generating activities, on the most cost-effective and efficient means of waste storage, treatment, and disposal; provide technical assistance and guidance to hazardous waste generating activities, tenants, and operators of RCRA hazardous waste TSDFs; provide for analysis of waste to determine if it is hazardous under applicable laws; ensure hazardous wastes are properly identified, segregated, and weighed before treatment, storage, disposal, or transportation; certify that wastes are hazardous wastes and provide copies of waste analysis before arranging for offpost transportation; coordinate an annual installation-wide inventory of all hazardous waste, and identify the waste generating activities; establish, monitor, and execute programs in waste management, including waste minimization, resource recovery, and recycling.

- Director of Logistics (DOL) - The DOL will monitor installation-wide use of hazardous materials to ensure progress in meeting Federal and Army hazardous waste minimization goals and requirements, and provide quarterly progress reports to the DPW. On a semi-annual basis, the DOL will recommend opportunities and provide a progress report to the IC in reducing the use and toxicity of hazardous materials, following the concurrence of the DPW.

Additionally, the DOL will arrange for and monitor all onpost and offpost shipments of hazardous waste, ensuring compliance with applicable laws and requirements; prepare and maintain records on transporting hazardous wastes, including manifests, and records maintained by the DRMO where co-located on an Army installation; sign the hazardous waste manifest as the IC's designee; coordinate with the DPW to obtain certification that wastes meet the Federal and state definition of hazardous wastes before offering for offpost transportation; advise waste generating activities on proper requirements for packaging, labelling, and shipping of solid waste and hazardous waste to enable the DOL to ensure that offpost transportation of these wastes conforms with Federal, state, Army, DOD, and host nation requirements; actively support the DPW in measuring progress to meet Federal and Army waste reduction goals and requirements; and communicate regularly with the Defense Logistics Agency (DLA) activity serving the installation to maintain current information on markets for hazardous wastes.

If not done by DOL, the Environmental Manager's Office may assume responsibility for manifesting, shipment, and recordkeeping.

- Commanders of Medical Department Activities (MEDDACs) and U.S. Army Medical Centers (MEDCENS) - MEDDAC and MEDCEN commanders will: provide the IC or IC's designee with the hazardous waste management implications of new and revised MEDDAC/MEDCEN practices for review and concurrence; and prepare and maintain a management plan for the disposal of medical waste.

- Installation Preventive Medicine Services (PVNTMED) - PVNTMED personnel will support the hazardous waste management programs, provide technical assistance in identifying wastes and inventorying sources of hazardous wastes, and represent the MEDDAC/MEDCEN as an installation tenant and hazardous waste generator.
- Installation Safety Officers - The installation safety officer (for ARNG, the state safety officer) will monitor the storage, packaging, transportation, treatment, storage, and disposal of waste, and personnel training requirements to ensure compliance with Federal, state, and Army safety standards.
- Chief, Installation Public Affairs Office (PAO) - PAO will establish the necessary supporting public affairs program; coordinate and conduct public involvement to obtain an RCRA permit and RCRA permit modifications, including an Environmental Assessment (EA) or Environmental Impact Statement (EIS); and assist the commander in preparing for any public hearings or public meetings sponsored by USEPA or states to issue or modify a RCRA permit for the installation.
- Tenants (Federal and non-Federal) - Tenants (such as the DRMO) on Army properties or where the Army is a tenant on non-Army property will comply equally with all laws and requirements.
- Managers of Government-Owned Contractor-Operated (GOCO) Facilities - GOCOs that produce hazardous waste on Army installations will: apportion fees to support the treatment, storage, and disposal of hazardous wastes; establish administrative requirements to preclude the Federal Government from incurring liability associated with treatment, storage, or disposal of hazardous wastes; prohibit the use of DOD personnel in handling solid and hazardous wastes; comply with Federal, state, and local laws and regulations and Army policies on reducing the volume, quantity, or toxicity of hazardous waste; prohibit the use of onsite hazardous waste TSDFs for non-DOD owned hazardous wastes generated offsite; pay fines assessed by state and Federal regulatory agencies for non-compliance (the Army cannot reimburse for such fines).
- Hazardous Waste Generators - Generators will properly identify, label, package, treat, store, dispose of, measure, transport onpost, or offer for transport offpost, hazardous wastes per requirements of RCRA, Department of Transportation (DOT), and the IHWP. Also, generators will ensure that all hazardous wastes generated during operations are certified by the DPW and tracked to minimize the potential for worker exposure, spills, or mixture with nonhazardous wastes; maintain accountability for, and document the flow of hazardous materials from the point of receipt to point of turn-in for disposal; minimize waste generation wherever possible and feasible; provide the DPW with the information necessary to prepare reports per the hazardous waste management plan; maintain an accurate inventory of hazardous waste that reflects changes in operation.
- Hazardous Waste TSDF Operators - Each TSDF operator is responsible for ensuring compliance with hazardous waste regulations and permit standards applicable to the facility including maintaining operational and training records.
- Defense Reutilization and Marketing Service (DRMS) - This agency may or may not be located on the installation. Regardless, it is the single agency designated by DOD to provide hazardous waste disposal service to the installation on a pay-for-services-rendered basis. The DRMS is responsible for compliance with all USEPA, state, and Army (including installation guidance) regulations at its storage/disposal facility. The DRMS may sign a manifest on behalf of the IC but the commander is still responsible for correct waste classification and manifest information.

F. Key Army/DOD Compliance Definitions

- *Chemical Warfare Agent* - a substance, which because of its chemical properties, is used in military operations to kill, seriously injure, or incapacitate humans or animals or deny use of indigenous resources (AR 200-1, Glossary).
- *National Response Center (NRC)* - the Washington D.C. Headquarters that coordinates activities relative to pollution emergencies. It is located at Headquarters U.S. Coast Guard (USCG) (AR 200-1, Glossary).

G. Records To Review in Addition To Those Listed in TEAM Guide

Generator (including TSDFs if they are also generators):

- Hazardous Waste Management Plan
- Used Solvent Elimination Program Contract (DPW or DOL)

In addition to the above, TSDFs would require:

- Location map of TSDFs

H. Physical Features To Inspect in Addition To Those Listed in TEAM Guide (see Appendix 4-1)

- DRMOs

I. People To Interview

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Safety and Health Officer
- Fire Department
- Director of Logistics (DOL)
- TSDF Operators (DPW, DOL, DRMS)
- Shop Activity Supervisor
- Defense and Reutilization Marketing Office (DRMO)
- Director of Personnel and Community Activities

J. Guidance for Active Army Hazardous Waste Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBER:
All Installations	HW.1.1.A through HW.1.9.A	4-9
Conditionally Exempt Small Quantity Generators (CESQGs)	HW.15.1.A and HW.15.2.A	4-15
Small Quantity Generator (SQGs)		
Personnel Training	HW.25.1.A and HW.25.2.A	4-17

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
HW.1 ALL INSTALLATIONS HW.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on hazardous waste management, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP).	Verify that current copies of the following, which are applicable, are maintained at the installation: - 40 CFR 260, <i>Hazardous Waste Management Systems: General.</i> - 40 CFR 261, <i>Identification and Listing of Hazardous Waste.</i> - 40 CFR 262, <i>Standards Applicable to Generators of Hazardous Waste.</i> - 40 CFR 263, <i>Standards Applicable to Transporters of Hazardous Waste.</i> - 40 CFR 264, <i>Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities.</i> - 40 CFR 265, <i>Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities.</i> - 40 CFR 266, <i>Standards for the Management of Specific Hazardous Wastes and Specific Types of Hazardous Waste Management Facilities.</i> - 40 CFR 268, <i>Land Disposal Restriction.</i> - 40 CFR 270, <i>The Hazardous Waste Permit Program.</i> - 49 CFR 171, <i>General Information, Regulations, and Definitions.</i> - 49 CFR 172, <i>Hazardous Materials Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements.</i> - 49 CFR 173, <i>General Requirements for Shipments and Packaging.</i> - 49 CFR 178, <i>Specifications for Packaging.</i> - NFPA, <i>Fire Protection Guide of Hazardous Materials.</i> - AR 200-1, <i>Environmental Protection and Enhancement</i>, 23 May 1990. - applicable state and local regulations. Determine if installation environmental staff is familiar with and knowledgeable about regulatory requirements. (NOTE: States may obtain authorization to operate the RCRA program from USEPA, provided regulations at least as stringent as USEPA regulations have been passed and an agreement has been signed with USEPA. State may pass more stringent regulations.)

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REQUIREMENTS:**

REVIEWER CHECKS:
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HW.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).

Determine what management systems are in place.

Verify that the existing system addresses the issues associated with hazardous waste management by:

- interviewing personnel
- reviewing paperwork
- observing the operation or activity.

Determine if training is being conducted.

Determine how hazardous waste is managed by starting at a point of generation and identifying through interviews, site visits, and paperwork review:

- how, where, and when the waste was generated
- how the waste was identified as being hazardous
- how waste is handled to prepare it for disposal or treatment
- where the waste is finally disposed of or treated.

Verify that installation environmental policies and regulations are sufficient and fully implemented.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
HW.1.3.A. Each installation will have a written hazardous waste management plan (AR 200-1, para 6-4b).	Verify that the DPW has prepared a hazardous waste management plan and provided copies to all facility personnel that generate, transport, treat, store, and dispose of hazardous waste. Verify that the plan is signed by the IC and includes the following: - responsibilities of installation organizations and personnel for hazardous waste activities - USEPA and state identification number - types and quantities of hazardous waste for each hazardous waste generating activity, including tenants - description of waste minimization projects - locations of all hazardous waste storage, treatment, and disposal units - description of installation procedures to treat, store, dispose of, transport onpost, or offer for transport offsite hazardous waste - procedures to analyze hazardous waste - inspection procedures - procedures for the prevention of unauthorized entry to the hazardous waste units - description of training programs - contingency plan measures - procedures to temporarily treat, store, dispose of hazardous waste if the use of existing facilities is unavailable - copies of any RCRA permits - location of the SPCC Plan and the ISCP.
HW.1.4.A. Each installation will conduct an annual inventory of hazardous waste (AR 200-1, para 6-4c).	Verify that the DPW has conducted an annual inventory of hazardous wastes, that it is certified by the IC, and that it includes: - the hazardous waste generators - names, addresses, and state/USEPA identification number of offsite TSDFs receiving the installation's hazardous waste - the name and USEPA identification number of each transporter used for offsite shipments of hazardous waste - description, USEPA hazardous waste number (from 40 CFR 261, subpart C or D), DOT hazard class, and quantity of each hazardous waste shipped offsite - the USEPA identification number of the offsite facility to which the waste was shipped - a description of efforts undertaken during the year to reduce the volume and toxicity of wastes generated - a description of the changes in volume and toxicity of waste actually achieved in comparison to previous years, beginning with 1985.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
HW.1.5.A. Army material resources should be procured and used in a way that minimizes waste production (AR 200-1, para 1-27a and para 6-6).	Verify that the DOL monitors installation-wide use of hazardous materials to ensure progress in meeting hazardous waste minimization goals and provides quarterly progress reports to the DPW. Verify that the DOL provides semiannual progress reports to the IC on the reduction of use and toxicity of hazardous materials, recommending opportunities for further reduction.
HW.1.6.A. Installations are required to report hazardous waste minimization efforts (AR 200-1 para 6-6c(1)).	Verify that the installation submits, by 1 March of even numbered years, USEPA Form 8700-13A/B to the appropriate state or USEPA Regional Administrator (depending upon whether the state has an USEPA-approved RCRA program). Verify that the report includes a description of efforts undertaken during the year to reduce the volume and toxicity of hazardous waste generated, and a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years.
HW.1.7.A. Munitions and ordnance which have been designated as waste are required to be handled according to RCRA hazardous waste management requirements (AR 200-1, para 6-7e).	Confirm that, if installation has explosive ordnance that become waste, the installation proactively adheres to AR 200-1, and appropriate state and Federal RCRA requirements.
HW.1.8.A. Chemical warfare agents destined for disposal will be managed as hazardous waste under RCRA, if applicable (AR 200-1, para 6-9a).	Verify that if the installation does have chemical warfare agents destined for disposal, they are treated as hazardous waste under RCRA. Verify that the IC reports, through command channels, to Headquarters, Department of the Army (HQDA) (DALO-SMZ) on the handling, use, inventory, or disposal of chemical warfare agents. Commanders will report on chemical accidents and incidents as required.
HW.1.9.A. Disposal of medical, dental, and veterinary supplies and wastes must meet specific requirements (AR 200-1, para 6-11).	Verify that medical, dental, and veterinary supplies and wastes that are RCRA listed or characteristic wastes are managed through the DRMO or a commercial contract with a permitted disposal firm. Determine if the generator possess the technical capability and facilities to dispose of items that are not RCRA listed but should be treated as a RCRA hazardous waste. Verify that, if the generator cannot dispose of the hazardous waste according to approved methods, the generator contacts DRMO for guidance.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
HW.1.9.A. (continued)	Confirm that ICs disposing of such medical, dental, and veterinary wastes by land burial maintain records on: - quantities disposed - disposal method used - disposal site location.

COMPLIANCE CATEGORY:
HAZARDOUS WASTE MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
HW.15 CONDITONALLY EXEMPT SMALL QUANTITY GENERATORS (CESQGs) HW.15.1.A. All CESQG personnel who handle hazardous waste should meet certain training requirements (MP).	Verify that the training program is directed by a person trained in hazardous waste management procedures. Verify that the training program includes the following: - contingency plan implementation (emergency procedures, equipment, and systems) - key parameters for automatic waste feed cut-off system - procedures for using, inspecting, and repairing emergency and monitoring equipment - operation of communications and alarm systems - response to fire or explosion - response to leaks or spills - waste turn in procedures - identification of hazardous wastes - container use, marking, labeling, and onsite transportation - manifesting and offsite transportation - accumulation point management - personnel health and safety and fire safety - facility shutdown procedures. Verify that new employee training is completed within 6 mo of employment. Verify that an annual review of initial training is provided. Verify that employees do not work unsupervised until training is completed. Verify specifically that accumulation point managers and hazardous waste handlers have been trained.

COMPLIANCE CATEGORY:
HAZARDOUS WASTE MANAGEMENT
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**REGULATORY
REQUIREMENTS:**

REVIEWER CHECKS:
May 1995

HW.15.2.A. Training records must be maintained for all CESQG staff who manage hazardous waste (MP).

Examine training records and verify they include the following:

- job title and description for each employee by name
- written description of how much training each position will obtain
- documentation of training received by name.

Determine if training records are retained for 3 yr after employment at the installation.

Verify that records accompany employees transferred within the Army.

COMPLIANCE CATEGORY:
HAZARDOUS WASTE MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
SMALL QUANTITY GENERATORS (SQGs) HW.25 Personnel Training HW.25.1.A. All SQG personnel who handle hazardous waste should meet certain training requirements (MP).	Verify that the training program is directed by a person trained in hazardous waste management procedures. Verify that the training program includes the following: - contingency plan implementation (emergency procedures, equipment, and systems) - key parameters for automatic waste feed cut-off system - procedures for using, inspecting, and repairing emergency and monitoring equipment - operation of communications and alarm systems - response to fire or explosion - response to leaks or spills - waste turn in procedures - identification of hazardous wastes - container use, marking, labeling, and onsite transportation - manifesting and offsite transportation - accumulation point management - personnel health and safety and fire safety - facility shutdown procedures. Verify that new employee training is completed within 6 mo of employment. Verify that an annual review of initial training is provided. Verify that employees do not work unsupervised until training is completed. Verify specifically that accumulation point managers and hazardous waste handlers have been trained.

COMPLIANCE CATEGORY:
HAZARDOUS WASTE MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

**REGULATORY
REQUIREMENTS:**

HW.25.2.A. Training records must be maintained for all SQG staff who manage hazardous waste (MP).

REVIEWER CHECKS:
May 1995

Examine training records and verify they include the following:

- job title and description for each employee by name
- written description of how much training each position will obtain
- documentation of training received by name.

Determine if training records are retained for 3 yr after employment at the installation.

Verify that records accompany employees transferred within the Army.

Appendix 4-1

Operations and Related Hazardous Waste Streams

Not all operations listed will generate hazardous waste. Wastes listed may be a solid waste, a state hazardous waste, or a RCRA hazardous waste.

Directorate of Logistics (DOL)

- Maintenance/transportation operations (opns): solvents, hydraulic fluids, fuels, ethylene glycol, battery acids, paint wastes, oils, brake fluid, spill residue, contaminated rags, oil filters, heavy metal contaminated sludges, brake pads, batteries.
- Painting operations: paint strippers, paint thinners, paint wastes (slop), epoxy (resin), filters, abrasive blast residue.
- Battery shop: battery acids, spill residue, hazardous materials that become hazardous waste due to shelf-life, expiration or package deterioration (check supplies, inventory management, waste management).
- Dry cleaning/laundry operations: filters, perchloroethylene, corrosive.

Directorate of Public Works (DPW)

- Vehicle and engine maintenance (maint) operations: solvents, hydraulic fluids, fuels, ethylene glycol, battery acids, paint wastes, oils, brake fluid, spill residue, contaminated rags, oil filters, heavy metal contaminated sludges, brake pads, batteries.
- Residential/occupational housing maintenance: lead paint debris, lead paint, paint wastes, solvents, oils, contaminated rags.
- Electrical maintenance: oils, solvents, PCBs (transformer fluids).
- Roads and grounds maintenances: oils, fuels, spill residue, paint.
- Emergency operations: boiler blowdown wastes, feed water chemicals, feed water testing wastes.
- Carpentry shop: varnishes, stains, adhesives, sealants.
- Metal shops: cutting oils, toxic metals.
- Painting operations: paint strippers, paint thinners, paint wastes (slop), epoxy (resin), filters, residue from abrasive blasting operations.
- Incinerator: ash.

(continued)

Appendix 4-1 (continued)

Medical Facility

- Pathology department: alcohol, methanol, acetone, formaldehyde, xylene, miscellaneous chemicals.
- X-ray operations: silver recovery unit.
- Pharmacy: pharmaceuticals.

Motor Pools

- For motor pools be sure to track waste from point of generation to storage location: solvents, hydraulic fluids, fuels, ethylene glycol, battery acids, paint wastes, oils, brake fluid, spill residue, contaminated rags, oil filters, heavy metal contaminated sludges, brake pads, batteries.

Airfields

- For airfields, be sure to track waste from point of generation to storage location: solvents, hydraulic fluids, fuels, ethylene glycol, battery acids, paint wastes, oils, brake fluid, spill residue, contaminated rags, oil filters, heavy metal contaminated sludges, brake pads, batteries, paint strippers, paint thinners, epoxy (resin), filters, residue from abrasive blasting operations.

NBC Operations/Storage Areas

- DS2, STB, decontamination kits, filters, batteries.

Print Plant

- Inks, solvents, rags.

TASC

- Photographic processing chemicals, paint wastes, inks, solvents, residue from abrasive blasting operations, waste from plastics modeling operations.

Open Burning/Open Detonation Sites

- Check permit and operations for compliance.

TSDF

- Check permit and operations for compliance.

Section 5

Natural Resources Management (Active Army Supplement)

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SECTION 5

NATURAL RESOURCES MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

- AR 420-74, *Natural Resources--Land, Forest, and Wildlife Management*. This AR, dated 25 February 1986, provides Army policy for managing natural resources and attaining the goal of ensuring that Army actions are not likely to jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of the critical habitat of such species.
- HQDA Memorandum (DAIM-ED-H), *Endangered/Threatened Species Guidance*. This memorandum, dated 15 February 1994, implements within the Army the requirements of the *Endangered Species Act* (ESA) and implementing regulations.

B. Department of Defense (DOD) Directives and Instructions

- DOD Directive (DODD) 4700.4, *Natural Resources--Conservation and Management*. This directive, dated 29 January 89, prescribes DOD policies and establishes an integrated program for multiple-use management of the renewable natural resources on DOD lands. It directs installations to protect, conserve, and manage the watersheds and natural landscapes, the soil, the forest and timber growth, the fish and wildlife, and endangered species as vital elements of the Army mission. It further stipulates that the natural resources will be used and cared for in the combination best serving the present and future needs of the United States and its people.
- DOD Instruction (DODI) 7310.5, *Accounting for Production and Sale of Forest Products*. This instruction, dated 25 January 1988, provides policy on DOD forestry accounting procedures.

C. Using the TEAM Guide For ECAS

- Pay special attention to possible endangered species in training areas, range areas, and development areas.

D. Key Army/DOD Compliance Requirements

- Integrated Natural Resources Management Plan (INRMP) - Army installations occupying land and water are to generate a program for developing, restoring, improving, conserving, and managing those resources. The INRMP will be developed to manage natural resources on an ecosystem basis in an effort to provide, where feasible, biological diversity. INRMPs must be consistent with legal and regulatory requirements and consistent with the military mission. The plan will be integrated for the concurrent management of all resources. The plan will cover, as appropriate for the installation, land (soil and water), grazing and cropland, forests, game and nongame fish and wildlife, and outdoor recreation. The plan, with reference to supporting NEPA documentation prepared in conjunction with the plan, will consider and evaluate the interrelated effects, impacts, and the influences of climate, soil parent material, slope, aspect, and ground as well as surface water.

- Cooperative Plans - All Category I installations are required to prepare and implement Cooperative Plans for Conservation and Development of Fish and Wildlife Resources. Category I installations are those having land and water areas suitable for the conservation and management of fish, wildlife, and other natural resources as determined by consultation with appropriate Federal and state fish and wildlife agencies (AR 420-74, para 8-1b, 8-3c, and 5-4).
- Cooperative Agreements - Installations will maintain liaison with agencies through cooperative agreements. These agreements assist in developing and implementing well-coordinated, multiple-use natural resources programs.
- Proper and Legal Use of Funds - Funds collected from the outleasing of lands for agricultural and grazing purposes may only be used to support the agricultural outleasing program or to support other multiple use natural resources programs. Hunting and fishing fees may only be used to support fish and wildlife management on the installation on which it was collected. Receipts from the sale of forest products may only be used to offset costs directly related to the production of commercial forest products within the DOD (10 U.S. Code (USC) 2665, 2667, and 2671).
- Natural Resources Conservation and Beautification Committee - Installation Commanders (ICs) having natural resource programs should appoint this subcommittee of the Environmental Quality Control Committee (EQCC). The subcommittee objectives are to ensure continuous planning and application of the integrated natural resource program, promoting and fostering natural beauty; and natural resource enhancement, protection, and compliance both on the installation and in cooperation with local communities (AR 420-70).
- Natural Resources Coordinator - ICs are required to appoint a natural resources coordinator, as applicable. The coordinator should be an active member of the EQCC.
- Natural Resources Law Enforcement - Natural resources law is required to be enforced by individuals specifically trained and qualified in the area of natural resources law enforcement. This is a specific requirement of the cooperative agreement specified in the *Sikes Act* (16 USC 670 et seq and DODD 4700.4).

E. Key Compliance Personnel

- ICs are ultimately responsible for all compliance on their installation.
- Department of Public Works (DPW), or the designated Environmental Directorate is responsible for funding, supervising, controlling, and managing installation natural resources, including plant and animal species.
- Natural Resources Management Professional is responsible for preparing management plans and cooperative agreements, budgets, and the annual natural resources report. The natural resources management professional also implements and controls all activities in furtherance of natural resources management. On installations without a full-time Natural Resources Management Professional, these duties could be assigned to the environmental coordinator (EC) or community planner.

F. Key Army/DOD Compliance Definitions

- *Category I* - installations having land and water areas suitable for the conservation and management of fish and wildlife, and other natural resources (AR 420-74, para 10-4a(1)).
- *Category II* - installations for which a decision is pending as to program suitability within the meaning of Category I (AR 420-74, para 10-3a(2)).
- *Coastal Zone* - the coastal waters (including lands therein and thereunder) and the adjacent shorelands (including the waters therein and thereunder) strongly influenced by each other and in proximity to the shoreline of the several coastal states (AR 420-74, para 1-19).
- *Conservation* - the protection, improvement and use of natural resources according to principles that will provide optimum public benefit and support the military missions (AR 420-74, para 1-7).
- *Cooperative Plan* - a plan for the management of fish and wildlife on an installation which has been mutually agreed upon by the IC, Regional Director, U.S. Fish and Wildlife Service (USFWS), and the state fish and wildlife agency (AR 420-74, para 1-25).
- *Forest Management* - the science, the art, and the practice of managing and using for human benefit the natural resources that occur on or in association with forest lands (AR 420-74, para 1-10).
- *Grounds* - all land and water acreage for which an IC has responsibility (including satellite areas). Grounds are grouped into the following three categories: improved grounds; semi-improved grounds; and unimproved grounds (AR 420-74, para 1-13).
- *Improved Grounds* - acreage on which intensive maintenance activities must be planned and performed annually as fixed requirements. Activities include mowing, irrigation, fertilization, cultivation, aerification, seeding, sodding, spraying, pruning, trimming, weed, dust, and erosion control, drainage, planting for landscape effect, wind and sound abatement, and other intensive practices (AR 420-74, para 1-13).
- *Land Management* - the planning and execution of programs to improve, utilize, and maintain all land and water areas for the greatest net public benefit while supporting the military mission. Included are subordinate land uses that are mutually compatible and consistent with maintaining environmental qualities (AR 420-74, para 1-9).
- *Multiple-Use* - the integrated management of all natural resources, each with the other, to achieve the optimum use and enjoyment while maintaining the environmental qualities, ecological relationships and esthetic values in proper balance (AR 420-74, para 1-6).
- *Natural Resources* - the viable and/or renewable products of nature and their environments of soil, air, and water. Included are plants and animals occurring on grasslands, rangelands, croplands, forests, lakes, and streams (AR 420.74, para 1-6).
- *Semi-Improved Grounds* - includes areas on which periodic recurring maintenance is performed but to a lesser degree than on improved grounds. Practices normally include such cyclic variables as soil sterilization, weed and brush control, drainage maintenance, and mowing for fire protection. Semi-improved grounds acreage may be combined with improved grounds acreage for reporting purposes when only two categories of grounds are used (AR 420-74, para 1-13).

- *Sustained Yield* - production of renewable natural resources a land or water area can maintain at a given intensity of management (AR 420-74, para 1-16).
- *Unimproved Grounds* - acreage not classified as improved or semi-improved (AR 420-74, para 1-13).

G. Records To Review in Addition To Those Listed in TEAM Guide

- Natural Resources Management Plan (Parts 1 through 5, as appropriate)
- Agricultural and Grazing Lease Contracts, and Land Use Plans
- Natural Resources Annual Work Plans and Approvals
- government-owned contractor-operated (GOCO) Maintenance Plan
- Outdoor Recreation Plan
- Outdoor Recreation Cooperative Agreement
- Budget Documents (DD 1383 report, Facilities Engineers Annual Work Plan)
- Biological Inventory Reports

H. Physical Features To Inspect in Addition To Those Listed in TEAM Guide

- Military Training areas (condition)
- Ordnance storage and disposal areas (condition)

I. People To Interview

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Chief of Operations and Maintenance (O&M)
- Director of Plans, Training, Mobilization, and Security (DPTMSEC)
- Natural Resources Specialist
- Directorate of Personnel and Community Activities (DPCA)

J. Guidance for Active Army Natural Resources Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBER:
All Installations	NR.1.1.A through NR.1.6.A	5-7
Miscellaneous Requirements	NR.4.1.A through NR.4.4.A	5-11
Land Management	NR.10.1.A through NR.10.8.A	5-13
Water Resources Management	NR.15.1.A and NR.15.2.A	5-17
Wildlife	NR.20.1.A through NR.20.6.A	5-19

COMPLIANCE CATEGORY:
NATURAL RESOURCES MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
NR.1 ALL INSTALLATIONS NR.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on natural resources, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). NR.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).	Verify that the following documents are maintained and kept current at the installations. - 7 CFR 360, <i>Noxious Weed Regulations</i>. - 50 CFR 21, <i>Migratory Bird Permits</i>. - 50 CFR 402, <i>Interagency Cooperation--Endangered Species Act of 1973, as amended</i>. - EO 12088, <i>Federal Compliance with Pollution Standards</i>. - AR 200-2, <i>Environmental Effects of Army Actions</i>. - AR 215-2, <i>Management and Operations of Army Morale, Welfare, and Recreation Programs and Nonappropriated Funds Instrumentalities</i>. - AR 420-74, <i>Natural Resources--Land, Forest, and Wildlife Management</i>. - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with endangered species and natural resources by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
NR.1.3.A. Installations meeting size and natural resource base requirements are required to have a INRMP that meets specific criteria (AR 420-74, paras 8-1a, 8-2a, 8-3b, and 8-4).	Verify that the INRMP includes the following parts according to the indicated parameters: - Part I: General (include if the installation has 500 or more acres of improved, semi-improved and unimproved grounds combined, or 50 or more acres of improved grounds) - Part II: Land Management and Ground Maintenance (include if the installation has 500 or more acres of improved, semi-improved and unimproved grounds combined, or 50 or more acres of improved grounds) - Part III: Forest Management (include if the installation has 100 or more acres of commercial forest land) - Part IV: Fish and Wildlife Management (include if the installation has land and water areas suitable for the management of fish and wildlife resources) - Part V: Outdoor Recreation (include if the installation has an outdoor recreation program that depends on the maintenance and management of natural resources). Verify that, if threatened or endangered species are present, an endangered Species Management Plan is included. Verify that the plan is implemented. Verify that parts are integrated (i.e., does forestry address wildlife concerns). Verify that the plan is reviewed annually and revised as necessary. Verify that the plan was prepared or updated within the previous 5 yr. Verify that the plan has environmental documentation consistent with NEPA and Council on Environmental Quality (CEQ) requirements. Verify that the plan was prepared and is kept current by qualified personnel.
NR.1.4.A. All Category I installations are required to prepare and implement Cooperative Plan for Conservation and Development of Fish and Wildlife Resources (AR 420-74, para 8-1b, 8-3c, and 5-4).	Verify that the Cooperative Plan for Conservation and Development of Fish and Wildlife Resources is prepared and amended as appropriate in coordination with state and Federal fish and wildlife conservation agencies. (NOTE: Category I installations are those having land and water areas suitable for the conservation and management of fish, wildlife, and other natural resources as determined by consultation with appropriate Federal and state fish and wildlife agencies.)

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NATURAL RESOURCES MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
NR.1.5.A. Installations with active natural resources programs or the potential for natural resources programs under the concept of AR 420-74 are required to have a Natural Resources Conservation and Beautification Committee (AR 420-74, para 2-7). NR.1.6.A. Personnel are required to be designated and trained for environmental responsibilities (DODD 4700.4, para E3(a) and AR 420-74, para 2-2 and 2-3c).	Determine if the installation has an active natural resources program or the potential for a program as described in 420-74. Verify that the installation has a Natural Resources and Beautification Committee that: - assures continuous planning and balanced application of the Natural Resources Program - plans, promotes, and fosters natural beauty and environmental protection and enhancement programs both onbase and in cooperation with local communities. Verify that the Committee includes: - the facilities engineer - the natural resource management personnel - the EC - the entomologist - the provost marshal/security officer - operations, safety, legal, medical, recreation services, and veterinarian personnel - a representative of the installations' rod and gun club. Verify that staffing optimizes professionally trained personnel necessary for technical guidance in planning and executing the Natural Resources Program such as: - an agronomist - a forester - a wildlife manager - a landscape architect - a soil conservationist - an agricultural engineer - an ecologist - an horticulturist - an arborist. Determine if periodic and comprehensive technical instruction concerning land preparation, soil management, fertilization, pruning, spraying, and other horticulture skills is provided for personnel engaged in the care and maintenance of lawns, trees, shrubs, and other landscape plants.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
NR.4 MISCELLANEOUS REQUIREMENTS NR.4.1.A. Receipts from natural resource management activities such as forest product sales, sales of hunting and fishing permits, sale of outdoor recreation use permits, and from agricultural and grazing leases, should be deposited in special accounts (MP). NR.4.2.A. Expenditures from special natural resources reimbursable accounts should remain fenced for specified purposes (MP). NR.4.3.A. Natural resources law enforcement personnel should be specially trained and certified as natural resources law officers (<i>Sikes Act</i>, 16 USC 670 et seq). NR.4.4.A. Natural resources should be adequately prioritized and addressed to meet all legal requirements (MP).	Verify that all proceeds from the sale of forest products are deposited into Account BCA 21F3875.3960 20-C S99999. Verify that all receipts from the sale of hunting, fishing, and trapping permits are deposited into Account 21X5095. Verify that all receipts from outleases for agricultural or grazing purposes are deposited into the Army account established for that purpose (21*F.3875.3950). Verify that only forestry activities are funded from reimbursable and refundable activities account number DAPM 37-100-95 (pg 390-44), 438856.E2. Verify that only fish and wildlife management activities are funded from Account 21X5095. Verify that funds received on installation from crops and grazing fund accounts (438856.E3) are utilized in support of: - the agricultural and grazing lease costs - furthering the agricultural and grazing lease program - other multiple use natural resource management programs. Verify that the personnel charged with enforcing natural resources law are specifically trained and warranted in natural resources law enforcement. Verify that the RCS 1383 process adequately prioritizes and addresses natural resources programs and needs. Verify that legal requirements are being addressed, recognized, prioritized, and funded.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
NR.10 LAND MANAGEMENT NR.10.1.A. Grounds are required to be maintained to meet designated uses and assure harmony with natural landscape (DODD 4700.4, para B1(h) and AR 420-74, para 3-1, 3-2, and 3-8). NR.10.2.A. Installations with recreation resources are required to be actively involved in developing a Cooperative Plan for Outdoor Recreation (AR 215-2 and 420-74, para 7-1). NR.10.3.A. Installations are required to provide for controlled public access at DA installations and facilities with land and water areas suitable for the recreational use and enjoyment of the public (AR 420-74, para 2-8a).	Verify that turf areas are maintained with a permanent vegetative cover of desirable plants determined by installation and MACOM natural resources staff. Verify that improved grounds are maintained in accordance with (IAW) parts 1 and 2 of the INRMP. Verify that landscape planting, pruning, cultivation, and other maintenance is done according to TM 5-630. Examine the Outdoor Recreation Program for the following: - maintenance responsibilities - evaluations for off-road vehicles (ORVs) - fish and wildlife resources management - installation potential to support community recreation needs. Determine if the installation has any land and water areas suitable for recreational use and enjoyment by the public. Verify that access is provided within manageable quotas and without impairment of mission. (NOTE: When access must be withheld the reasons must be substantiated by a statement in the Cooperative Plan.)

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**REGULATORY
REQUIREMENTS:**

REVIEWER CHECKS:
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NR.10.4.A. Effective forest management must provide for the sustained production of timber and related natural resources values (AR 420-74, para 4-1 and 4-4).

Verify that forest management is done so that:

- volume inventories are made and kept current for all forest lands managed for timber production
- small volume (including firewood) sales are IAW AR 405-90
- harvesting and treatment provides for:
 - sustained yield
 - improved training areas
 - improved watersheds
 - improved wildlife habitat
- it complements natural beauty values along scenic corridors
- it fully supports the military mission
- it focuses on the entire ecosystem, not just commercial production.

Verify that forestry management is done in accordance with the INRMP.

NR.10.5.A. Land management operations are required to be consistent with modern conservation and land use principles (AR 420-74, para 2-10 and 2-13 through 2-16).

Verify that land management at the installation includes the following issues:

- dust and erosion control
- fire protection
- weed control.

Examine leases, easements, and other special uses and interview natural resource manager to determine compatible uses and periodic inspections for land involved, including:

- condition of agriculture, grazing, and timber (or other resources) sale areas leased
- compliance with lease provisions, environmental recreation, and good professional practice.

Verify that an inventory and classification has been done of the current resources, including identification and evaluation of the condition and potential of wetland, marine, and estuarine area, fresh water, forest land, grasslands, scenic and natural areas, aesthetics, and any other significant environmental element.

Verify that inventories identify endangered and threatened species of flora and fauna and archeological and historic sites.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
NR.10.6.A. Land management at the installation should address various issues (MP). NR.10.7.A. A protective vegetative cover or other measures will be used to control dust and erosion damage to land (AR 420-74, para 2-14, 3-1). NR.10.8.A. Installations are required to control ORV (MP).	Verify that the land management program addresses the following issues: - land use limitations - mission requirements - fire protection - coastal zone management (where appropriate) - beach properties (where appropriate) - wetlands - Integrated Training Area Management (ITAM) as appropriate. Verify that the Land Management Plan addresses, in detail, erosion problems on training and maneuver areas and proposes remedial actions. Verify that the installation has been surveyed to locate areas where bare soil is exposed and current or potential erosion is obvious. Verify that remedial actions have been initiated. Determine if ORVs are authorized on the installation. Verify that, if ORVs are authorized on the installation, regulations are developed for their control. Verify that ORV regulations address endangered species if there are endangered or threatened species on the installation. Verify that the ORV regulations address all other natural resources and outdoor recreation plans as activities as well as mission needs.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
NR.15 WATER RESOURCES MANAGEMENT NR.15.1.A. Wetlands and waters of the United States should be noted in installation planning maps (MP). NR.15.2.A. If irrigation is practiced, installations should have a water resources monitoring plan (MP).	Verify that wetlands and waters of the United States are noted on installation planning maps. Verify that the installation has developed plans to preserve protect, and acquire the water supplies necessary to support all natural resources projects and programs. Verify that the installation is complying with local water conservation initiatives and restrictions.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
NR.20 WILDLIFE NR.20.1.A. The installation's Fish and Wildlife Management Program must be operated according to specific parameters (AR 420-74, para 5-1, 5-2, 5-5, and 5-6). NR.20.2.A. Installations are required to produce Endangered Species Management Plans (ESMPs) for listed and proposed species and critical habitat present on the installation (DAIM-ED-H Memorandum, para 11-5a(1) and 11-5b).	Verify that fishing, hunting, and trapping are authorized and controlled in conformance with Federal and state laws, local regulations, and approved management plans. Verify that foreign species of fish and wildlife have not been introduced to Army land without approval from USFWS, the state, and HQDA. (NOTE: Seasons, bag limits, and number of permits should be determined by biological parameters rather than fiscal requirements.) (NOTE: Fees collected should be comparable to similar offpost rates and should be managed according to Army regulations.) Verify that wildlife management is done in accordance with the INRMP. Verify that, at a minimum, the ESMPs include the following: - documented survey and inventory information (including maps, written descriptions, geographic information system (GIS) data base, etc.) on the species, including habitat distribution and the location and size of the installation population - the conservation goals for the subject species and critical habitat, established in consultation with the FWS or National Marines Fisheries Service (NMFS) - objective measurable criteria which, when met, would meet the installation's conservation goals for the listed species and critical habitat and milestones for achieving the goals - area specific management prescriptions and actions necessary to meet the installation's conservation goals for the species and critical habitat - the means to include, as appropriate, the ESMP provisions into the installations ITAM program - an ongoing inventory and monitoring plan - estimates of the time, cost, and personnel needed to carryout these measures needed to achieve the conservation goals - a checklist for use by those assessing installation compliance with the ESMP. Verify that the ESMP is approved by the IC within 1 yr after discovery of a listed/proposed species or the proposal for listing a species or proposal for designation of critical habitat, whichever occurs first. (NOTE: All proposed ESMPs are subject to <i>National Environmental Policy Act</i> (NEPA).) (NOTE: An ESMP is not final until it and the supporting NEPA documentation are approved and signed by the IC.)

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NR.20.2.A.(continued)	(NOTE: ESMPs may be combined and upon approval by the IC, made a part of the INRMP.)
NR.20.3.A. Specific individuals are to be involved in the development of the ESMP (DAIM-ED-H Memorandum, para 11-6).	Verify that the installation engineer, or environmental directorate where applicable, in coordination with the testing or training directorate and the installation environmental law specialist are involved in the preparation of the ESMP. Verify that the EQCC is briefed on each proposed ESMP and supporting NEPA documentation. Verify that the installation The Judge Advocate General (TJAG) renders a written legal opinion stating whether the approval of the ESMP and supporting NEPA documentation is in accordance with NEPA, ESA, and regulatory requirements before the ESMP is forwarded to the IC for approval. Verify that, after approval by the IC, final, formal agreement is obtained from the FWS or NMFS, and the state wildlife agency to include the ESMP as a part of the cooperative plan.
NR.20.4.A. The ESMP is required to undergo annual review (DAIM-ED-H Memorandum, para 11-6e and 11-6(g)(2)).	Verify that the ESMP is reviewed annually and updated as needed. Verify that, in the fourth quarter of each calendar year, the installation engineer or environmental director makes a written report to the IC including the following information: - the status of listed and proposed species and their habitats - progress towards completion of any incomplete ESMPs - progress toward installation conservation goals - actions taken to implement ESMPs - contacts with the FWS or NMFS - ESA violation and problem areas - compliance with MACOM and HQDA guidance, changes to ESMPs - any other necessary information necessary for reviewers to make an independent assessment. (NOTE: The annual review is conducted concurrently with the preparation of the annual installation engineer's or environmental directors ESMP compliance report.) (NOTE: Minor changes may be approved by the installation engineer or environmental director.)

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NR.20.5.A. Notices of ESA violations are required to be immediately reported (DAIM-ED-H Memorandum, para 11-9).

NR.20.6.A. Installation with listed species or critical habitat, training or testing directorates, will have a mandatory ongoing training program for personnel with potential contact with listed species or their habitats (DAIM-ED-H Memorandum, para 11-10).

Determine if the installation has received a notice of ESA violation.

Verify that any violation or suspected violation was immediately reported, by telephone or electronic means, through MACOM channels to HQDA (DAIM-ED and DAJA-EL).

Verify that a written report was sent within 7 days.

Verify that testing directorates ensure users of test ranges receive appropriate awareness training.

Verify that the training covers, at a minimum:

- identification of listed species and markings that identify restricted areas
- actions necessary to avoid injury to listed species and their habitat
- the pertinent requirements of the ESA and applicable regulations
- the importance of protecting listed species and biological diversity
- the Army policy that mission accomplishments must be consistent with the conservation of listed species and critical habitats.

Section 6

Other Environmental Issues (Active Army Supplement)

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SECTION 6

OTHER ENVIRONMENTAL ISSUES

A. U.S. Army Regulations (ARs) and Policies

Environmental Impacts

- AR 200-1, *Environmental Protection and Enhancement*. This AR, dated 23 May 1990, identifies and lists Department of the Army (DA) responsibilities, policies, and procedures to preserve, protect, and restore the quality of the environment. AR 200-1 contains several citations to the *National Environmental Protection Act* (NEPA). Section 6-5 outlines environmental documentation requirements and procedures mandated by NEPA and set out in NEPA and AR 200-2 to address environmental issues other than those covered by U.S. Environmental Protection Agency (USEPA)/state in the *Resource Conservation and Recovery Act* (RCRA) permitting process. Section 6-9(a) requires preparation of supporting environmental documents pursuant to NEPA and other laws and regulations for the plans for disposing of chemical warfare agents. Section 9-7(c) requires that all on-the-ground work to carry out the National Contingency Plan (NCP)/RCRA requirements and the Installation Restoration Program (IRP) and Formerly Used Defense Sites (FUDS) projects be conducted per NEPA. In addition, depending on the project and its potential for environmental impact, preparation of the *Comprehensive Environmental Response, Compensation and Liability Act* (CERCLA)/*Superfund Amendments and Reauthorization Acts* (SARA) support documents will adhere to the environmental documentation requirements in NEPA. Section 10-1(a)(2) cites NEPA as one of the several laws to be used in the asbestos management program. Section 12-2(b) sets out matters to be discussed in the NEPA review of alternative methods.
- AR 200-2, *Environmental Effects of Army Actions*. This AR, dated 23 December 1988, establishes policy, procedures, and responsibilities for assessing the environmental effects of Army actions. It is coded at 32 CFR 651 and implements the following items: the Council on Environmental Quality's (CEQ) NEPA regulations, Executive Order (EO) 12114, *Environmental Effects Abroad of Major Federal Actions*, and Department of Defense Directive (DODD) 6050.1. The NEPA process is described in this regulation. AR 200-2 states that for the NEPA process to be effective, it must be integrated with other Army project planning at the earliest possible time. This will ensure that Army planning and decision-making reflects environmental values; the goals of safeguarding the environment and minimizing adverse environmental effects are achieved; and delays and potential conflicts later in the decision-making and implementing processes are avoided. The regulation contains information concerning actions that require environmental evaluation; environmental review categories; determining appropriate environmental documentation; integrating environmental reviews concurrently with other Army planning and decision-making actions; identifying mitigation measures and monitoring systems; proper use of listed categorical exclusions (CXs) and procedures for amending the list; describes the environmental assessment (EA) and environmental impact statement (EIS) procedures; and describes the method of obtaining public involvement in the environmental decision-making process.

Environmental Noise

- AR 200-1, *Environmental Protection and Enhancement*. Chapter 7 of this AR, *Environmental Noise Abatement Program*, outlines the requirements for compliance with Federal laws and regulations on the control and abatement of environmental noise. These requirements include assessment of the impact of noise produced by proposed Army actions and maintenance of an active Installation Compatible-Use Zone (ICUZ) program.

The IRP

- AR 200-1, *Environmental Protection and Enhancement*. Chapter 9, *Environmental Restoration Program*, implements the remedial response aspect of CERCLA, as amended by SARA. It provides guidance for the management of the Army IRP and FUDS program. It details the procedures and the required documents necessary at each stage of the remedial process, from the Preliminary Assessment/Site Inventory (PA/SI), through the Remedial Investigation/ Feasibility Study (RI/FS), to the Remedial Action (RA).
- AR 200-2, *Environmental Effects of Army Actions*. This AR defines Army policy relative to compliance with the NEPA when projects are undertaken pursuant to the requirements of CERCLA/SARA. Basically, this section outlines the required environmental records to be completed during the course of a remedial action under CERCLA, from identification through completion. Other chapters in AR 200-2 give detailed information on preparing the following documents: EAs, EISs, CXs, Findings of No Significant Impact (FNSIs), Notices of Intent (NOIs), and Records of Decision (RODs).

Pollution Prevention

- Headquarters, Department of the Army (HQDA) Letter 200,94-1, *Army Pollution Prevention Program*. This letter establishes policies and assigns responsibilities within the Army for the management of the Army Pollution Prevention Program. The letter expires 19 January 1996.

Environmental Program Management

- AR 200-1, *Environmental Protection and Enhancement*. This AR briefly outlines the RCS 1383 procedure. The Office of Director, Environmental Programs sends detailed technical guidance to the Major Army Commands (MACOMs) for the collection and processing of information required for the report. Installation commanders are responsible for ensuring that their RCS 1383 reports are prepared jointly by the installation's environmental staffs and resource managers. AR 200-1 also briefly discusses the RCS 1485 Report. Installations submit input via Army Compliance Tracking System (ACTS) rollup into the Defense Environmental Management Information System (DEMIS) Report.

B. Department of Defense (DOD) Directives and Instructions

Environmental Impacts

- All applicable directives and instructions have previously been implemented by ARs.

Environmental Noise

- All applicable directives and instructions have previously been implemented by ARs.

IRP

- All applicable directives and instructions have previously been implemented by ARs.

Pollution Prevention

- Secretary of Defense Memorandum, *Comprehensive Pollution Prevention Strategy*. This memorandum, dated 11 August 1994 outlines the strategy for incorporation of the requirements of EO 12856, 12873, and 12902.

Program Management

- All applicable directives and instructions have previously been implemented by ARs.

C. Using the TEAM Guide for ECAS

Environmental Impacts

- Findings with an AR citation that are related to NEPA should be classified as Class I findings.

Environmental Noise

- No additional instructions.

IRP

- Contact the AEC site manager or site project manager.

Pollution Prevention

- The RCRA Hazardous Waste Minimization plan may be incorporated into the Pollution Prevention Plan.

Program Management

- In addition to the checklist items in section O5, Program Management, assessors of this media should assess the installation's environmental program using the Phase 3, *Protocol for Conducting Environmental Management assessments of Federal Facilities/Organization*, taken from the new USEPA Generic Protocol for Federal Facilities published March 1995. This excerpt is provided in Appendix 6-1.

While not written specifically for military organizations, this protocol should prove to be very helpful in assessing management systems at the installation. Using this excerpt s planned as an interim measure. We would like to incorporate these sections and items which assessors find useful and ask that user's provide comments to USAEC.

Any findings based upon the USEPA excerpt are to be written under checklist item O5.2 which is our standard management system item. This criteria or standard used as the basis of the finding should be entered and explained in the Finding Comment field in the ECAS software.

D. Key Army/DOD Compliance Requirements

Environmental Impacts

- NEPA Process - Installations are required to perform various environmental surveys and assessments whenever an action is contemplated that could have an effect on the environment. Actions may not be taking place on the installation being assessed, but if the proponent is there it should be a review item.

Environmental Noise

- ICUZ Noise Contour Maps - Up-to-date noise zone maps for the installation's current and long range peacetime capabilities are completed.
- ICUZ Study - Initial and followup ICUZ studies have been conducted.
- ICUZ Coordination - Explained and provided technical assistance to local, regional, and state planning agencies.
- Noise Mitigation - Identify noise sources that create impact and mitigate when possible.
- ICUZ Committee - Established an ICUZ committee.
- Operational Data - Maintain a log of range and aircraft operational data.
- ICUZ Point-of-Contact (POC) - Designated an installation single POC for noise complaints.

IRP Program Management

- Program Objectives - The objectives of the IRP are to identify, mitigate, investigate, cleanup, and closeout IRP sites.

Pollution Prevention

- Pollution Prevention Plan - Installations are requires to have a written Pollution Prevention Plan by 31 December 1995 that details how they are going to meet the 50 percent reduction goal.

- Procurement - Installations are required to follow affirmative procurement procedures in order minimize waste. Paper products that are purchased are required to have a percentage of their content come from recycled materials.
- Hazardous and Toxic Substances Inventory - Installations are required to have an inventory of their hazardous and toxic substances which indicates the location of the substances.

Environmental Program Management

- Environmental Pollution Prevention Control and Abatement Report, RCS 1383 Report - The RCS 1383 Report is required for all Army installations.
- RCS 1485, *Report/Army Compliance Tracking System (ACTS)* - RCS 1485 input is required for all installations via ACTS input submissions.

E. Key Compliance Personnel

Environmental Impacts

- Installation, activity, and unit commanders (Installation Commanders (ICs)) will:
 1. monitor proposed actions and programs within their commands
 2. task the appropriate component with preparation of EAs and EISs and development of public involvement
 3. assure that appropriate environmental documentation is prepared and forwarded to the proponent decision-maker(s)
 4. initiate the preparation of necessary environmental documentation and assess the environmental consequences of proposed programs and projects
 5. coordinate appropriate environmental documents and public affairs initiatives with HQDA agencies and the Army Environmental Coordinator
 6. assist in the review of environmental documents prepared by DOD and other Army or Federal agencies, as requested.

Environmental Noise

- ICUZ Committee - Each installation shall have an ICUZ committee. Membership should include as a minimum, representatives from the IC; environmental management; master planning; Public Affairs Office (PAO); Staff Judge Advocate (SJA); and plans, operations, and training (range control and airfield operations). The ICUZ committee shall be responsible for reviewing complaints; investigating and recommending mitigative actions; coordinating with the public as necessary; assessing installation activities for potential noise impacts; monitoring land development plans, programs, and projects in areas adjacent to the installation; and reviewing development of onpost facilities.

(NOTE: The functions of the ICUZ committee may be incorporated into the Environmental Quality Control Committee (EQCC).)

IRP

- ICs will:
 1. monitor proposed actions and programs within their commands
 2. task the appropriate staff with preparation of EAs and EISs and development of public involvement
 3. assure that appropriate environmental documentation is prepared and forwarded to the appropriate proponent
 4. initiate the preparation of necessary environmental documentation and assess the environmental consequences of proposed programs and projects
 5. coordinate appropriate environmental documents and public affairs initiatives with MACOM, HQDA agencies, the Army Environmental Office, and state and Federal regulatory agencies
 6. assist in the review of environmental documents prepared by the DOD and other Army or Federal agencies, as requested
 7. be responsible for all IRP projects on the installation
 8. ensure that proposals for real property transaction concerning installations included in the IRP will be immediately reported through channels to HQDA (ENVR-E)
 9. assign an on-scene coordinator/remedial project manager (OSC/RPM) for all ongoing IRP projects on the installation.
- The OSC/RPM will act as the IC's representative on all IRP matters and perform the duties described in 40 CFR 300.33(b). The OSC/RPM will also:
 1. coordinate with the MACOM for Army National Guard (ARNG), National Guard Bureau; for U.S. Army Reserves (USAR), MUSARCs, U.S. Army Environmental Center (USAEC), and the Corps of Engineers:
 - a. on all proposals for removal and remedial action
 - b. on the installation's POC for regulatory agencies
 - c. on monitoring the activities of contractors as requested
 - d. on reviewing, and comment on draft reports prepared by USAEC or the Corps of Engineers on IRP activities
 - d. on reviewing response plans and recommendations for IRP response actions and proposed future actions
 - e. ensuring that currently operating facilities are not and do not become sources of hazardous materials contamination
 - f. ensuring that USEPA, state, regional, and local officials have adequate opportunity for timely review and comment on proposed activities, establishing a technical review committee (TRC) per AR 200-1, para 9-10, developing, implementing and maintaining a community relations program for IRP activities that meets all regulatory guidelines
 - g. establish an administrative record of the installation that is included or proposed for inclusion on the National Priorities List (NPL).
- The USEPA will establish and recommend sites for inclusion on the NPL.
- The PAO will establish the necessary supporting Public Awareness Program(s).

Pollution Prevention

- Installations, activities, and unit commanders (ICs) will:
 1. establish baseline data for total toxic releases so that the baseline year for future reductions is no later than Calendar Year 1994 and comply with *Emergency Planning and Community Right-to-Know Act* (EPCRA) and *Pollution Prevention Act* reporting requirements
 2. establish or modify management infrastructures to ensure adequate focus of management and budget is applied and Army pollution prevention goals and objectives are achieved
 3. prepare a pollution prevention plan for the installation and MACOM level
 4. assist in the conduct of comprehensive, multi-media pollution prevention planning efforts for all installations within a command
 5. program for, and subsequently implement, pollution prevention technology developed through the RDT&E program
 6. report annually to the next highest headquarters on the status of pollution prevention programs, including new programs implemented and new technologies introduced
 7. budget and execute a pollution prevention program through incorporation into the RCS 1383 Report and the Programming, Planning, Budget, and Execution System (PPBES)
 8. ensure that pollution prevention is added to unit, installation, and MACOM Mission Essential Task Lists (METLs)
 9. ensure/conduct pollution preventing training of personnel.

Environmental Program Management

- Installation, activity, and unit commanders (ICs) will:
 1. be actively involved and maintain awareness of environmental programs, activities, critical issues, enforcement actions, RCS 1383 and 1485 submissions, environmental section of the installation budget request, environmental entries and results and updates of the ECAS reports (assessment reports and corrective action management plan)
 2. ensure other Directorates, tenant activities and unit commanders cooperate with the DPW and/or environmental officer on environmental responsibilities
 3. conduct and followup ECAS assessments.
- DPW will:
 1. ensure environmental projects are incorporated in the Annual Work Plan (AWP)
 2. prepare and provide input on environmental requirements in the installation budget request/
 3. prepare the RCS 1383 and 1485 Report
 4. provide input to the RCS 1485 DEMIS report via ACTS
 5. provide copies of enforcement actions from regulatory agencies to respective MACOM.
- PAO will establish the necessary support to DPW and interface with public, to include maintaining the Public Affairs Plan.
- Safety Office will provide required support for management of hazardous materials (i.e., worker protection guidance, inspecting assistance).
- Preventative Medicine Office will:
 1. provide required respiratory and protective support, conduct, and maintain baseline medical surveys
 2. provide Quality Assurance/Quality Control (QA/QC) on management of pathological wastes.

- Director of Logistics (DOL) will be responsible for compliance and QA/QC on the Used Solvent Elimination (USE) Program, petroleum, oil, and lubricant (POL) management (new and used materials), hazardous materials tracking to include material safety data sheets (MSDSs), and environmental controls.oversight of maintenance, transportation, and ammunition storage activities.
- Civilian Personnel Office (CPO) will:
 1. provide personnel support regarding classification, recruitment, and placement
 2. provide support in obtaining required environmental training.
- Director of Resource Management (DRM) will:
 1. review budget input and ensure environmental requirements are properly considered
 2. provide support and guidance to manpower survey/Schedule X activity in establishing and maintaining required staffing.

F. Key Army/DOD Compliance Definitions

- *A-Weighted Sound Level* - the A-weighted sound level is a quantity, in decibels, read from a sound level meter with A-weighting circuitry. The A-scale weighted discriminates against the lower frequencies according to a relationship approximating the auditory sensitivity of the human ear (AR 200-1, Section II).
- *C-Weighted Sound Level* - a quantity, in decibels, read from a sound level meter with C-weighting circuitry. The C-scale incorporates slight de-emphasis of the low and high frequency portion of the audible spectrum. The C-weighted sound level measures the additional annoyance caused by the low frequency vibrations of structures (AR 200-1, Glossary, Section II).
- *Class I* - includes projects required to meet the provisions of assigned compliance agreement or consent order; projects required to correct deficiencies found on an USEPA or state inspection; other projects needed to come into compliance when statutory/regulatory deadlines have passed.
- *Class II* - includes those projects needed to meet future compliance deadlines for which planning must have already started.
- *Class III* - includes all other projects which while important are not related to imminent compliance requirements.
- *Compliance Status* - a four letter code identifying the current compliance status of the pollution source for which a project is being funded.
 1. CMPA, Compliance Agreement: Required to meet conditions of a signed Federal Facility Compliance Agreement, Consent Order or equivalent state or local enforcement action. Project Assessment value: HIGH
 2. INOV, Inspection/Notice of Violation: Required to meet deficiencies found on inspection by regulatory authority or cited in an NOV or equivalent. Project Assessment value: HIGH
 3. ESDP, Established Standard, Deadline Passed: Does not meet established standard and compliance deadline has passed. Project Assessment value: HIGH
 4. ESDF, Established Standard, Deadline Future: Does not meet established standard and compliance deadline is in the future
 5. PSDF, Pending Standard, Deadline Future: Does not meet pending standard and compliance deadline is in the future

6. ESRO, Established Standard, Replacement for Obsolescence: Meets established standard but needs replacement due to need or obsolescence
 7. ESRE, Established Standard, Replacement for Expansion: Meets established standard but needs replacement due to need for expansion
 8. ESDL, Established Standard, Demonstrates Leadership: Meets established standard but needs to demonstrate leadership
 9. OTHR, Other. Projects which don't fit any of the above categories.
- *dBA* - Sound level in decibels, measured using the A-weighting network of a sound level meter (AR 200-1, Section II).
 - *dBC* - Sound level in decibels, measured using the C-weighting network of a sound level meter (AR 200-1, Section II).
 - *Decibel (dB)* - A unit of measurement of sound pressure level (AR 200-1, Section II).
 - *Defense Environmental Restoration Account (DERA)* - the DOD funding program for the IRP (AR 200-1, para 9-4).
 - *Environmental Agreement* - includes, but is not limited to, consent orders, consent agreements, compliance agreements, memorandum of agreement, memorandum of understanding, Interagency Agreements (IAGs), Federal Facility Compliance Agreements (FFCAs) (AR 200-1, para 12-6b).
 - *Environmental Monitoring Report (Optional)* - an optional but recommended report prepared at one or more point after program or action execution. Its purpose is to determine the accuracy of impact predictions, and it can serve as the basis for adjustments in mitigation programs and to adjust impact predictions in future projects (AR 200-2, para 3-2c).
 - *Environmental Noise* - the outdoor noise environment consisting of the noise, including ambient noise, from all sources that extends beyond the workplace. The noise environment of the workplace is not considered environmental noise (AR 200-1, Section II).
 - *Environmental Planning Guide (Optional)* - a document prepared before or at the outset of a major program concept exploration. Its use is optional but encouraged. A concise document intended for use by the program planners and designers, it provides guidelines and supporting rationale by which planners and designers could prevent, avoid, or minimize adverse environmental effect through environmentally sensitive design and planning. It can be made to be a requirement of contractors (AR 200-2, para 3-2a).
 - *Environmental Planning Record (Optional)* - this is an optional but recommended document that records the progress and a process of environmental considerations throughout a given program's development. It may be a journal with periodic entries, a file of memoranda, trip reports, and so forth. It is designed to be a visible track record of how environmental factors have actually been considered and incorporated throughout the planning process. It can be made a requirement of contractors (AR 200-2, para 3-2b).
 - *Feasibility Study* - within the IRP (or CERCLA), the means for development, evaluation, selection, and description of remedial action alternatives (AR 200-1, para 9-7f(2)).

- *Final Environmental Impact Statement (FEIS)* - this document is the result of the analysis of comments concerning the preliminary draft environmental impact statement (PDEIS). Comments are to be received from: designated Federal, state, and local agencies; any agency that has requested copies of impact statements; and the public (including interested or affected persons and organizations) (AR 200-2, para 6-5g).
- *ICUZ* - a land use planning procedure employed to control environmental noise (AR 200-1, Section II).
- *Life Cycle Environmental Document (LCED)* - a programmatic assessment addressing the known and reasonably foreseeable environmental impacts of a proposed item/system during all phases of development, production, use, and disposal. It may be in the form of an EA or an EIS, and must be supplemented to address additional significant environmental impacts as conditions change. It is most frequently used within the materiel research, development, and acquisition community (AR 200-2, para 3-1f).
- *National Priorities List (NPL)* - the list of the most serious uncontrolled or abandoned hazardous waste sites identified for possible long-term remedial response (AR 200-1, para 9-9).
- *Practicable* - capable of being used in accordance with applicable specifications, available at a reasonable price and within a reasonable time-frame, and with the maintenance of a satisfactory level of competition.
- *Preliminary Assessment Screening* - a compressed preliminary assessment used when certain real estate transactions are proposed.
- *Preliminary Draft Environmental Impact Statement (PDEIS)* - a document containing information obtained and decisions made during the scoping process (AR 200-2, para 6-5d(1)).
- *Procuring Agency* - all Federal agencies, or any state agency, or agency of a political subdivision of a state, that is using appropriated Federal funds for such procurement, or any person contracting with any such agency with respect to work performed under such a contract.
- *Record of Decision (ROD)* - this document is required after completion of an EIS. Generally, it is to: state what the decision was; identify all alternatives considered and specifying which alternative was environmentally preferable; and state whether all practicable means to avoid or minimize environmental harm from the selected alternative have been adopted and if not, why not. In addition, it states the monitoring and mitigation program adopted (if needed). It may also discuss preferences among alternatives based on nonenvironmental factors (economic and technological). The ROD is not considered an environmental document since the decision considers these other, nonenvironmental factors in addition to environmental factors (AR 200-2, para 6-5i).
- *Record of Environmental Consideration (REC)* - a document that describes the proposed action and anticipated timeframe, identifies the proponent, and explains why further environmental analysis and documentation is not required. It is a signed statement to be submitted with project documentation. Furthermore, it is used when the proposed action is exempt from the requirements of NEPA, or has been adequately assessed in existing documents and determined not to be environmentally significant. It is also used to document the use of those CXs that require such records (AR 200-2, para 3-1a).

- *Remedial Action (RA)* - the actual construction or implementation phase that follows the remedial design of the selected cleanup alternative at a site (AR 200-1, para 9-7f(6)).
- *Remedial Investigation (RI)* - the IRP-related or CERCLA-related process to determine the nature and extent of the problem posed by a release or threatened release (AR 200-1, para 9-7f(1)(c)).
- *Scoping* - this process occurs when the planning for an Army project or action indicates a need for the preparation of an EIS. Scoping determines the scope of issues to be addressed in the EIS and identifies the significant issues related to the proposed action. The parties identify the range of actions, alternatives, and impacts to consider in the EIS (AR 200-2, para 2-6d).
- *Site Inspection* - a technical phase, following a preliminary assessment, designed to collect more extensive information on a hazardous waste site. The information is used to score the site with the Hazard Ranking System to determine if response action is needed (AR 200-1, para 9-7f(1)).

G. Records To Review in Addition To Those Listed in TEAM Guide

- Complaint log from local community and the following documentation:
 - ICUZ committee charter
 - ICUZ reports and studies
 - ICUZ committee meeting minutes
 - ICUZ committee membership list
- Contour maps, if applicable
- RCS 1383 Report
- Troop Construction Projects
- Offpost actions (i.e., training, leases, maneuvers)
- Command Operating Budget (COB)
- Unfinanced Requirements Report (UFR)
- 1485/DEMIS Report/ACTS
- Annual Work Plan (AWP)
- Installation Action Plan
- IR Workplan

H. Physical Features To Inspect in Addition To Those Listed in TEAM Guide

- Test tracks
- Ranges
- Airfields, Heliports/Helipads
- Areas of noise/land use conflict
- Vehicle motor parks
- Rock quarry operations
- Fire training pits

I. People To Interview

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Fire Department

- Engineering, Plans, Training, Mobilization, and Security (DPTMSEC)
- Public Affairs Office (PAO)
- Range Control (DPTMSEC)
- Aviation Command (DPTMSEC)
- Staff Judge Advocate
- Master Planner (DPW)
- Budget
- Safety
- Action Proponent
- Engineering, Plans, and Services (EP&S)
- Inspector General (IG)
- Directorate of Personnel and Community Activities (DPCA)
- Director of Resource Management (DRM)
- Civilian Personnel Office (CPO)
- Directorate of Plans, Training, and Mobilization (DPTM)
- Director of Logistics (DOL)

J. Guidance for Active Army Other Environmental Issues Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBER:
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THE NEPA PROCESS O1.1 All Installations O1.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on NEPA, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). O1.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).	Determine whether copies of the following regulations and policy letters, which are applicable, are maintained and kept current at the installation: - EO 12088, <i>Federal Compliance with Pollution Standards</i>. - 40 CFR 1500 through 1508, <i>Regulations for the Implementation of the National Environmental Policy Act</i>. - AR 200-1, <i>Environmental Protection and Enhancement</i>. - AR 200-2, <i>Environmental Effects of Army Actions</i>. - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with NEPA by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented.

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O1.1.3.A. The installation must perform a number of activities in the implementation of NEPA (AR 200-2, para 1-4k).	Verify that the installation: - monitors proposed actions and programs within its command - tasks the appropriate component with environmental review and preparation of EAs an EISs where appropriate, and development of public involvement activities - assures that appropriate environmental documentation is prepared and forwarded to the appropriate proponent - initiates the preparation of necessary environmental documentation and assesses the environmental consequences of proposed programs and projects - coordinates appropriate environmental documents and public affairs initiatives with Major MACOM, HQDA agencies, the EC, and ODEP as required - assists in the review of environmental documents prepared by DOD and other Army or Federal agencies, as requested.
O1.1.4.A. The EC should have access to installation and tenant planning processes via attendance at Master Planning Board meetings, Range Control schedules, or other means suitable to the particular installation and its mission (MP).	Verify that the EC has the listed access and information.
O1.1.5.A. The EC should have data available to support determinations associated with appropriate level of NEPA determination (MP).	Verify that the EC is notified or otherwise has timely project/proposal information to determine appropriate environmental documentation level based on project type. Verify that the EC has the environmental data or information needed to determine the following, or means to obtain the data in a timely manner to make such determinations: - CXs - EAs - EISs.

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THE NEPA PROCESS O1.5 Documentation O1.5.1.A. All potentially affected parties, including the public, will be involved, when practicable, in the development of environmental documentation (AR 200-2, para 7-1). O1.5.2.A. Army units are required to integrate environmental review concurrently with other planning and decision-making actions (AR 200-2, para 2-6a).	Determine if the need for public involvement is being met in the following manner: - the development of a plan to include all affected parties - public involvement as a part of the scoping process when an EIS is being prepared - public involvement when appropriate in the development of EAs. Verify that, when necessary, the following persons and agencies are contacted: - municipal, township, and county elected and appointed officials - state, county and local government officials and administrative personnel whose official responsibilities include responsibility for activities or components of the affected environment related to the proposed action - local and regional administrators of other Federal agencies or commissions that may control resources potentially affected by the proposed action - members of identifiable population segments within the potentially affected environment - members and officials of those identifiable interest groups of local or national scope that may have interest in the environmental effects of the proposed action or activity - any person or group that has specifically requested involvement. Verify that installation organizations have developed some method to ensure they consult with EC to determine environmental review and documentation requirements for actions they plan or perform. Verify that action proponents have documented compliance with environmental review requirements for actions they plan or perform.

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O1.5.3.A. CXs may apply to proposed actions, exempting them from further environmental assessment under specific circumstances (AR 200-2, para 4-1 through 4-4 and Appendix A).

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Verify that prior to using a CX the following actions were taken:

- it was determined that the action appropriately fit one of the CXs listed in Appendix 6-2
- it was determined whether or not there were any extraordinary circumstances that might result in the proposed
- action having an impact on the human environment that would require an EA or EIS including:
 - greater scope or size than normally experienced for a particular category of action
 - potential for degradation of already existing poor environmental conditions
 - employment of unproven technology
 - presence of threatened or endangered species and their habitats, archaeological materials, historical places, or other protected resources
 - use of hazardous or toxic substances that may come in contact with the surrounding natural environment
 - proposed actions affecting areas of critical environmental concern
- it was determined that the answer to all the screening questions is Section II of Appendix A of 200-2 was yes (see Appendix 6-2).

Verify that record copies of RECs are available for any projects in which a CX was used. A REC is required according to the listing in Appendix A of AR 200-2 (see Appendix 6-2).

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O1.5.4.A. Certain actions require the preparation of an EA (AR 200-2, para 5-2 and 5-3).	Verify that an EA is prepared for the following actions: - special training or test activity not included in the annual installation training cycle - military construction, including offpost construction - installation pesticide, fungicide, herbicide, insecticide, and rodenticide use programs - changes to established installation land use that may cause environmental impacts - proposed changes in doctrine or policy that may have a potential environmental impact - repair or alteration projects affecting historically significant structures, archaeological sites, or places on, or meeting the criteria for nomination to, the National Register of Historic Places - acquisition, or alteration of a laboratory that will use hazardous chemicals, drugs, or biological or radioactive materials - actions that could potentially cause soil erosion, affect prime or unique farmland, wetlands, floodplains, coastal zones, wilderness areas, aquifers, or other water supplies, or wild and scenic rivers - new weapon systems development and acquisition, in all phases - development of the installation master plan - development of natural resource management plans - proposals that may lead to the excessing of Army real property - actions that take place in, or adversely affect, wildlife refuges - proposals for energy conservation through forest harvest - field activities on land not controlled by the military (including firing over navigable waters, firing 215 m aboveground, and joint air attack training greater than 250 knots and below 3000 ft above ground level) - any action with local or regional effects on energy availability - an activity that affects species on or proposed for the U.S. Fish and Wildlife Service (FWS) list of Threatened or Endangered Species, or state equivalents - production of hazardous or toxic materials - installation restoration projects - operations and maintenance/Army National Guard (ARNG) projects (to include U.S. Army Reserve activities) that will affect environmental quality - site specific deployment of life cycle systems meeting the threshold criteria for requiring an EA - special field training exercises or test activities off Army or DOD property that extend into national airspace (45 m (148 ft)) above ground level) - changes to established airspace use that affects the environment or socioeconomic systems, or creates a hazard to nonparticipants - any other action with the potential for cumulative impact on environmental quality when combining effects of other actions or when the action is of a lengthy duration, a violation of pollution abatement standards, or harmful to culturally or ecologically sensitive areas.

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O1.5.4.A. (continued)	(NOTE: An EA is not required if the installation has already decided to prepare an EIS.) Verify that installation proponents have received notice of the types of actions they plan or perform which may be likely to require EAs, and that they may be required to perform or fund mitigations committed to in such EAs. Verify that offices responsible for performing mitigation to which the installation has committed in an EA/FNSI, but that did not participate in EA/FNSI development, have received notice of such commitments and are performing or have performed the mitigations.
O1.5.5.A. EAs are required to contain specific information (AR 200-2, para 5-4a).	Verify that EAs contain the following information: - purpose and need for the proposed action - description of the proposed action - the alternatives considered, including no action - affected environment (baseline conditions) - environmental consequences of the proposed action, and the alternatives - listing of agencies and persons consulted - the conclusion, or finding, on whether the environmental impacts are significant.
O1.5.6.A. All EAs must prompt either the preparation of an FNSI, or an NOI to file an EIS (AR 200-2, para 5-5).	Determine whether all EAs for projects (that have not been cancelled or delayed) are accompanied by an FNSI or have been followed by an NOI.
O1.5.7.A. Existing EAs are required to be reviewed periodically as the action continues (AR 200-2, para 5-8).	Verify that existing EAs are covering actions still in progress are reviewed to verify that the setting, actions, and effects described remain substantially accurate.

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O1.5.8.A. The EA, the FNSI, and all other appropriate planning documents will be provided to the appropriate decisionmaker for review and consideration. The signature page for the EA and the FNSI package will be signed by the appropriate decisionmaker to indicate his or her review and approval (AR 200-2, para 5-4b).	Verify that the decisionmaker(s) for the proposed action has (have) signed and approved both the EA and the FNSI, or a complete package including the EA plus FNSI.
O1.5.9.A. FNSIs with national interest will be made available to the public prior to initiation of the proposed action, unless excluded on a security basis, according to specific parameters (AR 200-2, para 2-6b and 5-5c).	Verify that FNSIs that have national interest are submitted with the proposed press release through command channels to Deputy Assistant Secretary for the Army Environment, Safety, and Occupational Health (DASA ESOH) for approval and subsequent publication in the Federal Register. Verify that FNSIs with national interest are coordinated with the Office of the Chief of Public Affairs (OCPA). Verify that local publication of the FNSI does not precede publication in the Federal Register.
O1.5.10.A. For actions of local or regional interest, the FNSI will be publicized according to specific parameters (AR 200-2, para 2-6b and para 5-5d).	Verify that the following are notified of FNSIs: - state and areawide clearinghouses - Indian tribes when effects may occur on reservations - local newspapers - other local media - potentially interested community organizations including small business associations - newsletters that may be expected to reach potentially interested persons - owners and occupants of nearby housing (by direct mail).

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01.5.11.A. EAs and FNSIs are required to be made available for review and comment according to specific time schedules (AR 200-2, para 2-6b and para 5-5d).	Verify that if the proposed action is one of national concern, is unprecedented, or normally requires an EIS, the EA or FNSI is made available for public review 30 or more days prior to the final decision. Verify that if the proposed action is one of national concern, is unprecedented, or normally requires an EIS, there is a 30 day public comment period between the time that the FNSI is publicized and the time the proposed action begins. (NOTE: The public comment period may be shortened with MACOM approval.)
01.5.12.A. Installations are required to implement mitigation and/or other considerations established in the EA or FNSI (AR 200-2, para 2-7a and para 2-7d).	Verify that mitigation and other conditions established in the EA or FNSI or during their review and commitment as a part of the record of decision are implemented.
01.5.13.A. A proponent of an action must produce an EIS if certain conditions exist due to a proposed action (AR 200-2, para 6-2 and para 6-3).	Verify that the installation has prepared EISs for proposed actions that have the potential to: - significantly affect environmental quality or public health or safety - significantly affect historic or archaeological resources, public parks and recreation areas, wildlife refuges or wilderness areas, wild and scenic rivers, or aquifers - have significant adverse effect on properties listed or meeting the criteria for listing in the National Register of Historic Places, or the National Registry of Natural Landmarks - cause a significant impact to prime and unique farm lands, wetlands, floodplains, coastal zones, or ecologically or culturally important areas or other areas of unique or critical environmental concern - result in potentially significant and uncertain environmental effects or unique or unknown environmental risks - significantly affect a species or habitat listed or proposed for listing on the Federal list of endangered or threatened species - either establish a precedent for future action or represent a decision in principle about a future consideration with significant environmental effects - adversely interact with other activities with individually insignificant effects so that cumulatively significant environmental effects result - involves the production, storage, transportation, use, treatment, and disposal of hazardous or toxic materials that may have significant environmental impact.

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O1.5.13.A. (continued)	Verify that an EIS has been prepared for the following actions which normally require an EIS: - significant expansion of a military facility, such as a depot, munition plant, or major training installation - construction of facilities that have a significant effect on wetlands, coastal zones, or other areas of critical environmental concern - the disposal of nuclear materials, munitions, explosives, industrial and military chemicals, and other hazardous or toxic substances that have the potential to cause significant environmental impact - the life cycle development of new materials such as weapons systems that require the construction and operation of new fixed facilities or the significant commitment of natural resources - land acquisition, leasing or other actions that may lead to significant changes in land use - Continental United States (CONUS) realignment or stationing of a brigade or larger table of organization and equipment unit during peacetime - training exercises conducted outside the boundaries of an existing military reservation where significant environmental damage might occur - major changes in mission of facilities either affecting areas or critical environmental concern or causing potentially significant environmental impact.
O1.5.14.A. Public interaction in the EIS process through scoping must be done according to specific procedures (AR 200-2, para 7-2 through 7-5).	Verify that, in the preliminary phase of scoping, the following actions are done: - the significant issues to be analyzed are incorporated in the NOI - the office or person responsible for matters related to the scoping process is identified in the NOI - the method by which the installation will invite participation of affected parties is identified and a tentative list created - the proposed method of accomplishing scoping is identified - a relationship is initiated between the timing of the preparation of the environmental analysis and the tentative planning and decisionmaking schedule - any exemptions are identified in the NOI. Verify that, in the public interaction phase of scoping, the following actions are taken: - comments are solicited from all affected parties and respondents to the NOI - comments are solicited from technical representatives at the installation - comments are solicited from one or more representatives from any Army-contracted consulting firm if one has been retained to participate in writing the EIS or providing reports - comments are solicited from experts in various environmental disciplines.

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01.5.14.A. (continued)	Verify that all scoping participants are provided with the information developed during the preliminary phase and as much of the following as may be available: - a brief description of the environment at the affected location - a description of the proposed alternatives - a tentative identification of any public EAs and other EISs that are being or will be prepared that are related but are not a part of the scope of impact - any additional scoping issues or limitation on the EIS - the lead and cooperating agencies are identified.
01.5.15.A. A copy of the signed ROD must be forwarded to the Office, Director of Environmental Programs (AR 200-2, para 3-1g and 6-5).	Verify that a copy of the signed ROD has been forwarded to the Office, Director of Environmental Programs.
01.5.16.A. Specific records must be maintained in certain circumstances (AR 200-2, para 3-1).	Verify that the following documents, including all of supporting documentation properly considered part of the administrative record for such documents, are maintained: - REC - EA - FNSI - NOI - EIS - LCED - ROD. Verify that LCEDs prepared elsewhere are included as part of EA/EIS packages for items or systems being developed, tested, produced, or fielded at the installation. Verify that mitigation/monitoring records are maintained and kept current.

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O1.5.17.A. The proponent, or other appropriate agency, will implement mitigation and other conditions established in the EA or EIS or during its review, and committed as part of the FNSI or the ROD (AR 200-2, para 2-7a through 2-7c, 2-7d(3), 6-5l, and 6-5m).	Verify the following: - funds have been committed to perform commitments made in FNSI or ROD and mitigations adopted in EAs/EISs are actually being performed, or, if not, that EAs/EISs are revised and reissued for public comment to reflect the difference - if necessary, pending or ongoing actions are delayed to accommodate decision-maker, EC, and legal review and renotification of the public - a monitoring and enforcement program is adopted and summarized in the ROD if appropriate or applicable.
O1.5.18.A. Legal documents implementing the action (contracts, permits, grants, etc.), will specify mitigation measures to be performed (AR 200-2, para 2-7d).	Review legal documents supporting the action and verify that mitigations are included as appropriate, including contractor penalties in suitable circumstances.
O1.5.19.A. The LCED must address known and reasonable foreseeable environmental impacts of proposed programs/systems during all phases (AR 200-2, para 3-1(f)).	Review environmental documentation for known and foreseeable environmental impacts during all phases of proposed programs/systems to include development, production, use, and ultimate disposal.

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ENVIRONMENTAL NOISE O2.1 All Installations O2.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on environmental noise, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). O2.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).	Determine whether copies of the following regulations and policy letters, which are applicable, are maintained and kept current at the installation: - EO 12088, <i>Federal Compliance with Pollution Standards</i>. - AR 200-1, <i>Environmental Protection and Enhancement</i>. - TM 5-803-2, <i>Planning in the Noise Environment</i>. - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with environmental noise management by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented.

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O2.1.3.A. Installations are required to conduct an ICUZ Study as a part of the ICUZ Program to identify and control noise (AR 200-1, para 7-2c, 7-2d, and 7-5a).

Determine if an initial ICUZ study was completed.

Verify that the installation's ICUZ study includes the following minimum components:

- current noise zone maps of the installation's existing and future noise environment
- A-weighted day-night sound levels for transportation related noise
- C-weighted day-night sound levels for large amplitude impulsive noise
- at a minimum, the zones I, II, and III are shown
- analysis of land use compatibility problems and solutions to include:
 - identification of existing incompatible land uses within zones II and III
 - identification of possible incompatible land uses within zones II and III
 - identification of desirable land uses within zones II and III
- ICUZ public involvement plan
- review of installation master plans to ensure that existing and future facility siting is consistent with the noise environment
- identification of noise sources that create impact; investigation of possible mitigations; programming of resources to reduce noise impacts.

Verify that, where impacts exist offpost, the following is done:

- land use documents of surrounding jurisdictions acknowledge and incorporate military noise assessments
- military noise contours have been formally recorded and/or published in appropriate newspapers or other communications media.

Verify that the ICUZ study is being updated at least every 5 yr, or whenever significant noise producing operations change.

Verify that ICUZ regulations are integrated with AR planning regulations under AR 200-2.

(NOTE: Installations without significant noise sources, such as ranges, airfields, or industrial operations, are exempt from this requirement and must prepare a single page ICUZ statement of negligible impact (AR 200-1, para 7-5g and i(3)).)

(NOTE: Refer to Appendices 6-3 and 6-4 for further information.)

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O2.1.4.A. Each installation is required to establish an ICUZ committee (AR 200-1, para 7-1b and 7-5b).	Verify that an ICUZ committee has been developed that includes representatives from the following: - IC - environmental manager - master planning - PAO - SJA - range control and airfield operations. Verify that the ICUZ committee: - meets at least semi-annually - reviews the ICUZ study annually - reviews noise complaints - investigates and recommends mitigative action - assesses installation for possible noise impacts - monitors land development plans and projects in area adjacent to installation - reviews development of onpost facilities - coordinates with the public (as appropriate) - coordinates with public officials regarding offpost development bordering the installation. (NOTE: Installations may be exempt from this requirement if the functions of ICUZ committee are incorporated into EQCC as outlined in AR 200-1, para 12-13.)												
O2.1.5.A. Installations should adequately address existing and potential land use conflicts (MP).	Tour areas adjacent to installation boundaries and verify land use compatibility. Determine if there is a potential for existing compatible land uses to change (i.e., installation of infrastructure). (NOTE: A recommendation for further study will usually be appropriate since noise measurements usually will not be available to the evaluator.)												
O2.1.6.A. Assessment of helicopter noise must include a distance factor and specific factor to account for the special character of helicopter noise (AR 200-1, para 7-5c).	Verify that the following dB factors are included in the assessment of helicopter noise on the installation: <table border="0"> <tr> <td>- Slant distance meter (m)</td><td>Factor (dB)</td></tr> <tr> <td>0-200</td><td>7</td></tr> <tr> <td>200-300</td><td>5</td></tr> <tr> <td>300-400</td><td>3</td></tr> <tr> <td>400-500</td><td>1</td></tr> <tr> <td>500 +</td><td>0</td></tr> </table>	- Slant distance meter (m)	Factor (dB)	0-200	7	200-300	5	300-400	3	400-500	1	500 +	0
- Slant distance meter (m)	Factor (dB)												
0-200	7												
200-300	5												
300-400	3												
400-500	1												
500 +	0												

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O2.1.6.A. (continued)	Verify that, if helicopters or other impulse noise sources that have frequency energy sufficient to rattle windows or other building elements are present at the installation, two sets of noise zone maps are developed, one with and one without the penalty factors listed above that will illustrate areas where rattle-proofing techniques should be used as a mitigative technique in existing facilities and new construction.
O2.1.7.A. Installations are required to attempt to minimize environmental noise (AR 200-1, para 7-2e).	Determine if noise levels are being reduced by using: - noise reduction engineering - administrative and operational controls - appropriate siting and design of facilities and ranges - development and procurement of weapons systems and other military combat equipment that produce less noise - procurements of commercially manufactured products that produce less noise - appropriate land use controls including: - assisting in the development of protective offpost land use planning - assisting in the development of protective offpost structural requirements to mitigate noise impacts - controlling land use through easements - developing protective onpost land-use planning - developing protective onpost structural requirements to mitigate noise impacts.
O2.1.8.A. Onsite monitoring is required if zone III extends off the installation or a significant noise controversy exists (AR 200-1, para 7-5d).	Verify that monitoring has been or is being performed.

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O2.1.9.A. Installations are required to maintain operational data on noise producing activities (AR 200-1, para 7-5f).	Verify that noise operational data required to develop noise contour maps is being maintained including: - for impulsive noise (25 mm) or greater): - location of firing points - location of target areas - location of demolition areas - number of rounds fired at each firing point by type and time of day - propellant charge to each target - for aircraft noise: - flight track location - altitude of aircraft along flight track - number of operations along each flight track by type of aircraft and time of day - for small arms noise: - location of range - location of firing points - direction of firing - type of small arm/weapon fired. Verify that operational data covers 1 yr.
O2.1.10.A. Installations must institute a noise complaint procedure (AR 200-1, para 7-3).	Verify that a noise complaint procedure has been instituted that ensures the following: - a log is maintained of all noise complaints - complaints are investigated without delay - copies of complaints are routed to the office responsible for the type of activity that resulted in the noise complaint - PAO responds to the complaint. Verify that the noise-generating activity responds to PAO concerning all complaints and does a followup by identifying the cause of the noise and any action taken to correct deficiency. Verify that the ICUZ committee is provided with a copy of the complaint and followup.

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O3.1.3.A. Screening for past use of hazardous substances and the potential for contamination is required to be conducted at all major Army installations and subinstallations, and other properties controlled by the Army (AR 200-1, para 9-7a).	Determine if the installation has been screened for past use of hazardous substances.
O3.1.4.A. Each installation with an on-going IRP for sites listed on the NPL must have a TRC (AR 200-1, para 9-10).	Determine if the installation has formed and implemented a TRC. Verify that the committee includes representatives from the USEPA, state, and local regulatory agencies, and the public. Verify that the TRC holds public meetings quarterly or at identified milestones.
O3.1.5.A. In all CERCLA/SARA environmental restoration activities a PA/SI is required (40 CFR 300.420 and AR 200-1, para 9-7f and 9-7f(5)).	Verify that, in the IRP, an inventory of all the real property, the property over which the IC or other Army entity has control, has been done. Verify that at the start of the PA a program of full coordination with Federal and state regulatory agencies was established. Verify that, when a SI leads to a RI/FS, it is conducted in accordance with the provisions in AR 200-1 and 40 CFR 300.420 and that it was started within 6 mo after the installation was added to the NPL. Verify that, within 15 mo after the completion of the FS and the ROD, a selected alternative has been designed and substantial continuous onsite activity is underway. Verify that within 180 days after the USEPA's review of the RI/FS the installation enters into a IAG with the USEPA for the expeditious completion of necessary remedial actions.

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IRP O3.4 Miscellaneous Requirements O3.4.1.A. The Army is required to conduct response actions outside of installation boundaries where the installation is reasonably considered the sole or the major source of the release (AR 200-1, para 9-8).	Determine if data indicates contamination is migrating from a source on Army-controlled property to outside the installation boundaries. Verify that a process is in place to notify the following: - the MACOM environmental, legal, and public affairs staffs - the USEPA regional office and state and local authorities. Verify that offsite response plans are coordinated with USEPA, state, and local authorities and have been authorized by DASA ESOH. Verify that the installation seeks to minimize future commitments and liabilities.

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POLLUTION PREVENTION O4.1 All Installations O4.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on pollution prevention, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). O4.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP). O4.1.3.A. Installations are required to train the personnel in pollution prevention (DOD Memorandum, Objective 1, Subobjective 1).	Determine whether copies of the following regulations and policy letters, which are applicable, are maintained and kept current at the installation: - AR 200-1, <i>Environmental Protection and Enhancement</i>. - HQDA Letter 200-94-1, <i>Army Pollution Prevention Program</i>, 19 January 1994. - Secretary of Defense Memorandum, <i>Comprehensive Pollution Prevention Strategy</i>, 11 August 1994. - Applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with pollution prevention by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented. Verify that the installation is training the personnel in pollution minimization techniques and how to prevent pollution to the atmosphere.

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O4.1.4.A. An installation's written pollution plan is required to state how the facility will contribute to the DA's 50 percent reduction goal (HQDA LTR 200-94-1, para 6d)	Verify that the installation has or will have by 31 December 1995 a pollution prevention plan that includes the following: - installation pollution prevention policy - installation hazardous substance and hazardous waste baselines - installation pollution prevention goals and schedules - installations contribution to the DA toxic chemicals reduction goal by no less than 50 percent prior to 31 December 1999 - how goals will be reached - procedures for tracking progress towards goals and for revising the plan.
O4.1.5.A. An installation must comply with the Army affirmative procurement program for certain designated items (HQDA LTR 200-94-1, para 6d).	Verify that the installation complies with the Army affirmative procurement program.
O4.1.6.A. Printing or writing paper must have a minimum recycled content (HQDA LTR 200-94-1, para 6d).	Verify that, whenever possible, the paper contains at least 50 percent recovered products or the following standards are met when purchasing printing and writing paper: - for high speed copier paper, offset paper, form bond, computer printout paper, carbonless paper, file folders, and white woven envelopes: at least 20 percent postconsumer materials beginning 31 December 1994 and at least 30 percent postconsumer materials beginning 31 December 1998 - for other uncoated printing and writing paper: at least 50 percent recovered materials to include the above percents and schedules of postconsumer materials.
O4.1.7.A. A master listing of all hazardous substances at handling, storage, and transfer facilities is required as a part of the SPCC Plan (AR 200-1, para 8-4b(4)).	Obtain a copy of the hazardous substances list. Verify that personnel have knowledge of the location of all hazardous materials storage areas on installation. (NOTE: The inventory should include hazardous substances subject to EPCRA Section 313, <i>Toxic Release Inventory Reporting</i>, see the TEAM Guide for further information.)

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O4.1.7.A. (continued)	Verify that the inventory correlates chemical contents or CAS number to National Stock Number (NSN).
	(NOTE: Hazardous constituents of expired materials discovered during the inventory process, or at any other time, should be identified prior to disposal.)
O4.1.8.A. Hazardous material management is to be considered an integral part of the Army Hazardous Waste Minimization Program (AR 200-1, para 6-6b).	Verify that the installation has a Hazardous Waste Minimization Program in existence and that it addresses hazardous material management through the use of: - process substitution - material recovery - recycling - reuse.
O4.1.9.A. An installation should budget and implement cost effective hazardous waste minimization and polluting prevention plan recommendations (DOD Memorandum, Objective 3, Subobjective 3).	Verify that the installation submits 1383 reports for pollution prevention projects identified in hazardous waste minimization audits and the pollution prevention plan. Verify that cost effective waste reduction is also implement at tenant operations and GOCOs.
O4.1.10.A. An installation should use life cycle cost analysis to evaluate new technologies (MP).	Verify that life cycle cost analysis is used to evaluate new hazardous materials or new processes or technologies using hazardous materials or generating hazardous materials. (NOTE: The life cycle analysis should include the estimated costs of environmental permits, treatment, and disposal for all hazardous or toxic substances.)
O4.1.11.A. Certain procured products must be made from recovered solid waste RCRA Section 6002, 40 CFR 248 through 253).	Verify that procurement officer is aware of USEPA guidelines, and maintains a current set of the guidelines. Verify that purchases of an item (or of functionally equivalent items) that exceed \$10,000 within a fiscal year, and for which USEPA has issued guidelines, are made in accordance with those guidelines. (NOTE: Alternate guidelines may be developed to ensure compliance, but some guidelines must be established and followed for the items USEPA covers under this act.)

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PROGRAM MANAGEMENT O.5.1 All Installations O5.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on program management, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). O5.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP). O5.1.3.A. The Environmental Office should be organizationally positioned to effectively manage the installation's environmental program needs (MP).	Determine whether copies of the following regulations and policy letters, which are applicable, are maintained and kept current at the installation: - AR 200-1, <i>Environmental Protection and Enhancement</i>. - AR 200-2, <i>Environmental Effects of Army Actions</i> - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with management of the environment by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented. Verify that the EO is established and functioning as the primary POC for all environmental matters. Verify that the EC keeps the Command staff and environmental staff directly informed of all environmental issues Verify that the EO or EC is made aware of receipt of all VENC funding during current budget year. Verify that environmental funds are used for environmental projects only.

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O5.1.3.A. (continued)	Verify that adequate support and adequate contracting support is provided by the DPW, DOL, and DOC to maintain environmental compliances.
O5.1.4.A. Each installation is required to request sufficient staffing to perform the required environmental compliance activities (AR 200-1).	Verify that adequate/current environmental manpower requirements are prepared and submitted to DRM/DPTMSEC (Force Development) to obtain necessary staffing to support environmental program requirements. Examine the number of environmental staff versus the number of environmental sub-programs the office must manage.
O5.1.5.A. Each installation should ensure that Job Descriptions and Classifications adequately address the full range of functions and responsibilities of each position (MP).	Verify that staffing in all respective media areas is adequate to preclude compliance deficiencies directly related to inadequate manpower. Verify that adequate/correct job descriptions and grade classifications are prepared and submitted to CPO for classification and recruitment to obtain required personnel staffing and supporting grades. Verify that personnel are currently working on issues/duties directly related to their current position and grade.
O5.1.6.A. Each installation will have an EQCC (AR 200-1, para 12-3a through 12-13c).	Determine if CPO staffing specialists had first hand knowledge and understand the function and responsibilities of the current and proposed job descriptions. Verify that the installation has an EQCC, and that it is comprised of the following persons: - installation or community commander, or a designated representative, who will serve as chairperson - DPW, who will act as the executive secretary - the environmental officer the director of each major staff section of the installation or community - representatives from the following offices or functions: - Garrison Commander - preventive medicine - surety - resource management - safety - internal review - DOL - DCA - DRMO - DOC - PAO - CPO - AAFES

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O5.1.6.A. (continued)	- Inspector General - DPTMSEC (Aviation, Range Control) - Tenant unit commanders - Staff Judge Advocate - Agency (sponsor commanders) - Activity commanders - Satellite commanders - Subcommunity commanders - MUSARC representatives - Facility Engineer - Environmental Coordinator - Natural Resources Manager - and any others deemed appropriate by the IC (i.e., ARNG, USAR--MATES, UTES, CSMS, SMA, etc.). Verify that the EQCC meets monthly, or as often as considered necessary by the chairperson. Verify that the EQCC attendance is in accordance with Army regulation and installation policy. Verify that those attending are decision makers. Verify that the EQCC is active in the resolution of environmental issues.
O5.1.7.A. Installation personnel involved in environmental affairs should receive the necessary environmental training (MP).	Check with Environmental Officer to determine what training is being conducted. Types of personnel who should receive training, and kinds of training include: - environmental staff members (program management plus specialized training as required) - command staff (environmental awareness) - troops (garrison units, AT - USAR/ARNG) (environmental awareness plus specialized training as required) - installation managers (environmental awareness plus specialized training as required) - civilians (specialized training as required). Verify that troop units incorporate environmental training in the routine training plans (active garrison units and those at USARCs). Verify that the installation performs an internal assessment at the mid-point between external assessments. Internal assessments will be conducted per this supplement and the TEAM Guide. (NOTE: Internal assessments may be conducted by in-house staff or contracted.)

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O5.1.8.A. The IG, and the Internal Review Section of DRM should be proactively involved in environmental affairs (MP). O5.1.9.A. Environmental surveys and construction site clearances will be conducted before the selection of construction sites (AR 200-1, para 12-14). O5.1.10.A. A comprehensive inventory and evaluation of existing environmental conditions will be conducted on all real property before any transaction (AR 200-1, para 12-5).	Verify that the EC is familiar with IG and Internal Review Section environmental activities. Determine whether or not the IG (during routine visits) is assisting the EO with elevating the environmental awareness, by following up on actions other installation activities may have, to correct noncompliance issues and subsequently provides timely written notice and forwards copies of the written notice, report, or corrective action plan as required. Verify that surveys are conducted in accordance with AR 415-15 before site selection. Verify that the Environmental Office is part of the project review process for new construction and renovation (plans/specifications) to ensure environmental compliance (i.e., work orders, in-house, A/E designs, and MCA, MCAR, and MCARNG projects). Verify that the EO is an active participant of the Installation Master Planning board to ensure project coordination, review long range plans, and preclude environmental conflicts. Verify that a PAS is prepared for all Federal real property transfers and other transactions. The PAS will consider: - areas of cultural, historical, or archaeological significance - threatened or endangered species - environmentally sensitive areas - DOD, DA, Federal, regional, state, and local environmental regulatory compliance - any permit, permit discontinuance or closure requirements - properties or structures with known or potential environmental contamination (asbestos, radon, unexploded ordnance, hazardous or toxic materials/substances/wastes) - existing land use plans, IRP reports, and other environmental documentation. Verify that the PAS is reviewed for adequacy by the Army office that reviews associated REC, EA, or EIS. Verify that if the PAS discloses a release, or suspected release of contaminants, USAEC) is notified for consideration under the NCP. (NOTE: Non-Army parties will be requested to perform the PAS for transactions that they have initiated.)

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O5.1.10.A. (continued) O5.1.11.A. Proper notification of the contract of sale and associated covenants is the responsibility of the Army proponent (AR 200-1, para 12-5). O5.1.12.A. The Environmental Officer should maintain good rapport with the supporting MACOM Environmental Office (MP). O5.1.13.A. The EO should provide necessary support on a reimbursable basis to installation tenants including and assigned Reserve facilities and Guard activities (MP).	(NOTE: If the transaction qualifies for a CX, a separate PAS will be prepared before the record of environmental consideration, and will be included in the REC for review.) Verify that the proponent provides notice to the disposal agency, or other Federal agency if the transaction is subject to a transfer agreement, of the contract of sale and covenants as required by AR 200-1. Determine the nature of the working relationship between the Environmental Officer and the respective MACOM Environmental Officer: - Environmental Officer should consult with the MACOM Environmental Officer on such matters as: - spill reporting - enforcement action reporting - information updates - funding requirements - ECAS scheduling - updates to the ICAP - MACOM in turn should provide necessary environmental support, guidance and resources to the installation. Verify that the Environmental Officer at the installation provides the necessary environmental support to all satellite facilities (USARCs, AMSAs, ARCOMs, WET sites) on: - training - permits - UST program - used oil collection - used solvent collection - hazardous waste/hazardous material support - DRMO contract support - spill support/notification - environmental restoration - environmental project programming - environmental restoration.

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O5.1.13.A. (continued)

Verify the following through review of tenant/interagency agreements:

- support agreements are current (reviewed and updated at least every 3 yr)
- adequate information for responsibilities is contained in the support agreements
- cost reimbursable items are clearly defined.

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PROGRAM MANAGEMENT O.5.5. Compliance and Environmental Agreements O5.5.1.A. Noncompliance and violations must be reported to proper offices within established timelines (AR 200-1, para 12-7a and 12(b) through 12(d)). O5.5.2.A. Environmental compliance assessments will be undertaken in accordance with Army regulation (AR 200-1, para 12-8). O5.5.3.A. Installations should take actions to address unresolved enforcement actions (warning letters etc.) (MP).	Verify that the commander of any installation, activity, or unit who receives an enforcement action of any type, or is, or will be unable to comply with applicable regulations, notifies their MACOM immediately, by telephone. Verify that the installation authorizes an external assessment not less frequently than once every 3 yr. Verify that the installation develops a corrective action plan to correct the deficiencies identified in the external assessment, and that the plan is updated annually (see Appendix 6-5). Verify that the installation effectively uses the plan to track progress and implementation. Verify that the installation performs internal assessments with in-house staff. Verify that funding for ECAS corrective actions are included in the RCS 1383/A106. Verify that, as a followup to environmental compliance assessment sampling, installations check for compliance/noncompliance at similar facilities and activities. (NOTE: An example would be if 5 motorpools out of 20 were assessed in the external ECAS, a different group of motorpools is assessed in the internal ECAS.) Verify that the installation is working on resolving all enforcement actions.

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O5.5.4.A. Environmental compliance agreements (i.e., consent orders, MOAs, MOUs, FFCAs, etc.) will be prepared according to regulation (AR 200-1, para 12-6c through 12-6e).

Verify that draft environmental agreements contain:

- procedures for schedule modification and dispute resolution
- provisions for reimbursement to state governments for oversight expenditures in relation to the Army activity subject to the agreement
- language prescribed by the DA for agreements relating to CERCLA, and prepared for installations included on or proposed for inclusion on the NPL under CERCLA.

Verify that, in cases where fines are being issued, installations use supplemental environmental projects (SEPs) to reduce fines.

Verify that draft environmental compliance agreements are forwarded through MACOM to HQDA (DAJA-EL) WASH DC 20310-2210, for review and coordination. Draft agreements must be accompanied by:

- a brief description of the problem, the proposed action, and the parties to the agreement
- a map delineating the location of each site addressed in the agreement
- a funding plan that would ensure that the compliance schedule could be met.

Verify that public review and comment is provided for according to the requirements of NEPA, CERCLA, or other relevant Federal/state laws, where applicable.

O5.5.5.A. Installations should monitor and uphold the conditions/requirements of environmental agreements (i.e., timber, land/water use, recreational use permits, etc.) developed with Federal, state, or local agencies (MP).

Verify that the installations monitors and upholds the conditions/requirements of environmental agreements developed with Federal, state, or local agencies.

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PROGRAM MANAGEMENT O.5.10. Automated Reports O5.10.1.A. Each installation is required to request sufficient funding to perform the required environmental compliance activities (AR 200-1). O5.10.2.A Environmental compliance information should be incorporated into the ACTS (MP). O5.10.3.A ACTS submissions must be in accordance with DOD and HQDA guidance to support RCS 1485/DEMIS Reports (AR 200-1, para 22-11a(4)). O5.10.4.A The RCS 1383 report and ACTS submissions process must be incorporated into the Army planning, programming, and budgeting system (AR 200-1 para 12-11b(d)).	Verify that adequate projects and programs are described in RCS 1383 reports to justify funding submissions and that the submissions will in fact place the installation in compliance. Verify that installation VENC and DERA budget requests are supported by RCS 1383 entries. Verify that ACTS is regularly updated. Verify that quarterly and annual submission suspenses are being met. Obtain copy of the previous year's ACTS entries (at least three quarters). Verify that ACTS submissions are in accordance with DOD HQDA requirements and deadlines (quarterly). Verify that members of the installation have received training on the use of ACTS Software. Obtain a copy of the previous year's RCS 1383 reports. Ensure that RCS 1383 exhibits are properly classified in accordance with 1383 guidance. (NOTE: See Appendix 6-6 for pollutant categories.) Compare the Spring RCS 1383 Report with the environmental requirements in the installation budget request.

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O5.10.5.A DERA eligible projects should be submitted as DERA funded in the RCS 1383 Report (MP). O5.10.6.A The RCS 1383 report and ACTS submissions must be completed in an accurate manner (AR 200-1, para 12-11b). O5.10.7.A Semiannual RCS 1383 Reports must be prepared at the installation or activity level (AR 200-1, para 12-11b(c) and 12-11b(d)).	Verify that all DERA eligible projects are submitted as DERA funded in the RCS 1383 report, see Appendix 6- 7 for a list of DERA eligible projects. Determine if the installation has available a copy of the current HQDA Policy and Guidance for completion of the RCS 1383 report. Verify that members of the installation have received training on the DB1383 software. Verify that the installation uses appropriate sources and resources for establishing project cost estimates, pollutant categories, and law/regulation codes, i.e., COE field offices, MACOM, relevant regulations. Verify that ACTS entries for noncompliance are reflected in RCS 1383 CMPA and enforcement actions entries if funding is required to effect compliance. Compare RCS 1383 submissions with installation budget submissions (VENC and DERA). Identify/obtain explanations of discrepancies. Verify that the installation submits the RCS 1383 Report in accordance with MACOM guidelines.

Appendix 6-1

USEPA Phase 3 Protocol for Conducting Environmental Management Assessment of Federal Facilities/Organizations

This appendix is taken from the new USEPA Generic Protocol for Federal Facilities published in March 1995. It is provided to assist assessing management systems at the installation. We recognize that some sections are not pertinent to the military and ask that users comment to USAEC on what parts should be included in the next Army Supplement to the TEAM Guide.

Any findings based upon the USEPA excerpt are to be written under checklist item O5.1.2.A. which is our standard management system item. This criteria or standard used as the basis of the finding should be entered and explained in the Finding Comment field in the ECAS software.

(continued)

Appendix 6-1 (continued)

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- C. Approach**

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- Section 34 Environmental Commitment
- Section 35 Environmental Protection Programs
- Section 36 Formality of Environmental Program
- Section 37 Internal and External Communication
- Section 38 Staff Resources, Training, and Development
- Section 39 Program Evaluation, Reporting and Corrective Action
- Section 40 Environmental Planning and Risk Management

Appendix - Selecting Individuals to Interview and Documents to Review for Environmental Management Assessments

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Introduction

A. Purpose

The primary purpose of Environmental Management Systems Assessment is to provide the Federal facility concise information pertaining to:

- Strengths and weaknesses of environmental management systems and programs at Federal facilities;
- Adherence with Best Management Practices pertaining to environmental management systems and programs;
- Compliance with Federal agency's policies which address environmental management systems and programs;
- Identification of underlying causal factors contributing to the occurrence of observed compliance deficiencies; and
- Noteworthy environmental management practices.

These assessments are also intended to provide Federal facilities and contractors feedback on the effectiveness and benchmark performance of their environmental management systems and to identify opportunities for improvement.

Phase 3 reviews take a look at the "big picture" by assessing the overall functioning of established environmental management systems at a facility. This document divides Phase 3 protocols into the eight organizational disciplines listed below and attempts to provide assistance to the management of a facility when it seeks to understand and evaluate the systems which have been developed to manage and control environmental performance at a facility. In this review, the task of the assessor shifts from compliance auditor (Phase 1) and systems specific environmental discipline evaluator (Phase 2), to systems function evaluator of environmental performance at the facility.

B. Scope and Format

The scope of an Environmental Management Systems Assessment includes eight disciplines which are based on key characteristics and elements of effective environmental management systems. These eight disciplines are the following:

- Organizational Structure
- Environmental Commitment
- Environmental Protection Programs

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- Formality of Environmental Programs
- Internal and External Communication
- Staff Resources, Training, and Development
- Program Evaluation, Reporting, and Corrective Action
- Environmental Planning and Risk Management

(NOTE: Pollution prevention is dealt with comprehensively in each of the sections of Phase 2 as it pertains to those disciplines. Additionally, an overview has been provided as an Appendix to Phase 2.)

Each discipline is organized as follows:

- *Performance Objective:* This is a general statement of the overall objective to be met in each discipline.
- *Key Evaluative Concerns:* This section provides information on the major elements that will be evaluated in each discipline.
- *Criteria:* These are specific criteria that should be satisfied in order to meet the overall performance objective for each discipline. Each criteria is identified by a capital letter. The criteria within a discipline have been grouped and organized along the lines of the major elements identified in Key Evaluative Concerns.

The bullets under each criterion are intended to provide guidance to the assessor in evaluating that criterion; they are not intended to be subcriteria. Additional bullets or lines of inquiry may be appropriate depending on the specific organization being reviewed.

Many Federal facilities have tenant organizations, usually other Federal agencies, but also state and local agencies and private parties. Even though these tenant organizations may be responsible for environmental compliance of their activity, the facility owner may be ultimately held accountable by regulators should compliance problems persist or should future liabilities be discovered. These protocols can be used to address environmental compliance and management issues associated with tenant organizations. The agreements between the facility owner and the tenant organization need to clearly establish environmental responsibilities of both the facility owner and tenant organization and the mechanisms that the facility owner will utilize to monitor compliance, including application of these protocols to the tenant organizations.

Federal facilities must observe A-106 requirements. The A-106 planning process is a systematic methodology for identifying and prioritizing environmental requirements, and targeting resources necessary to address them. The process assists in establishing funding priorities for projects to meet statutory and regulatory requirements. Using a standardized format, Federal agencies must update their plans semi-annually and submit them to the EPA for review. EPA uses a computerized system (FEDPLAN-PC) to track these requirements from the time they are first identified until they are executed. The authority for the

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.
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development of these plans and review by EPA is contained in E.O. 12088 and Office of Management and Budget (OMB) Circular A-106. The procedures for developing Federal agency environmental plans are discussed in detail in EPA's Federal Agency Environmental Management Program Planning Guidance document, dated October 1994.

C. Approach

In an assessment of facility wide environmental programs, the responsibility of the environmental management specialist is to assess these programs to determine whether they effectively meet the performance objectives and whether they have sufficient structure and formality to assure that activities are conducted in a manner that is consistent with environmental regulations and Federal agency policy.

The assessment is based on a combination of staff interviews and document reviews. Interviews are exceptionally important in conducting an Environmental Program Assessment. They provide the primary means of understanding the organizational relationships, roles and responsibilities, policies, and systems that form the framework for the management of environmental matters. More importantly, they often reveal differences in the actual versus the documented practices. Document review is important to verify the formality of the system and confirm interview information. Suggestions for the type of staff to interview and documents to review are provided in the appendix.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Phase 3

Section 33

Assessing Environmental Programs Organizational Structure

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

1. Performance Objective

The structure of the organization being assessed should be such that environmental management functions are congruent and effectively integrated with other functions and processes. Roles, responsibilities, and accountabilities should be well defined and clearly communicated to effectively manage environmental issues. Authorities should be delegated to organizational levels that can ensure the effective implementation of environmental programs.

2. Key Evaluative Concerns

In this assessment discipline, the organization of the environmental management organization will be reviewed and evaluated. Important characteristics of an effective organizational structure include well defined roles and responsibilities, sufficient authorities, appropriate layers of management, effective reporting relationships, and congruence of the environmental management organization with the larger Federal agency organization.

3. Criteria

A. Management Organization

- 1) The organizational structure of the environmental management function is characterized by clear lines of authority and responsibility.
 - a. Review organizational charts, mission statements, and any other documentation of organizational design for the environmental management function.
 - b. Determine whether departmental missions and responsibilities related to environmental management are clearly defined and understood. Note any overlaps or conflicts of interest.
 - c. Determine which offices and individual(s) have authority and responsibility/accountability for various environmental management functions.
- 2) The environmental management function is organized in such a way that managers can be leveraged effectively, without being spread too thinly.
 - a. Determine the breadth and depth of responsibility of key environmental managers.
 - b. Determine whether environmental managers have too much responsibility to effectively carry out their jobs.
 - c. Determine whether environmental managers have too little responsibility to be cost effective to the organization.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- 3) Reporting relationships within the environmental management function are well defined, clearly communicated, and effectively integrated into the overall organizational structure.
 - a. Interview managers and environmental staff to understand these reporting relationships.
 - b. Determine where those relationships are defined and how they are communicated.
 - c. Evaluate whether actual reporting arrangements for environmental management (as determined through interviews) match those shown on existing organizational charts or on distribution lists. Note any differences.
 - d. Evaluate how well these reporting relationships and the environmental management organization fits in with the overall organization, e.g.,
 - centralization versus decentralization,
 - line versus matrix organizational structure.
- 4) Environmental managers are positioned high enough in the organization and have sufficient organizational stature, independence, and authority to effectively implement environmental programs and to make decisions related to environmental protection.
 - a. Understand the amount of authority given to environmental managers at different levels and determine if it is sufficient to carry out their responsibilities.
 - b. Understand the approval process and the level of approval necessary for specific actions or projects.
 - c. Identify who has stop-work authority and how quickly they can affect a necessary response.
 - d. Note how many reporting levels separate the organization's most senior manager and the person in charge of environmental matters.
 - e. Determine whether there are too many layers of management between these two positions (the organization's most senior management and the environmental professional).
 - f. Determine the effectiveness of communication between these two positions (the organizations most senior management and the environmental professional). (Linkage with Section 37).

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

5) The integrity and effectiveness of the organizational structure is periodically reviewed and revisions are made when warranted.

- a. Note how often it is reviewed and by whom.
- b. Understand the criteria used to evaluate organizational structure.
- c. Determine whether the organizational structure of the environmental management function has changed as a result of past reviews.

B. Roles and Responsibilities

(Linkage with Section 38)

- 1) Environmental roles and responsibilities are well defined, clearly communicated, and understood by all personnel whose activities may impact environmental performance.
 - a. Identify where and how these roles and responsibilities are defined, such as in program manuals or job descriptions.
 - b. Verify through interviews that individual jobs and responsibilities for environmental management match those in program plans and job descriptions.
 - c. Determine whether specific roles as required by Federal agency policy or Federal and state regulations have been assigned (e.g., NEPA Compliance Officer, Radiation Safety Officer).
 - d. Determine whether these roles and responsibilities are formally implemented.
 - e. Determine whether functional relationships between the environmental support group and the line units are formally defined and understood.
 - f. Review tenant/host agreement(s) to ensure environmental responsibilities are clearly defined between the tenant and the agreement holder (pg. 33-3).
- 2) Roles, responsibilities, and accountabilities are supported by management systems and documentation such as job descriptions, performance standards and performance appraisals.
 - a. Review job descriptions and performance standards for a sample of line management and operations staff to determine if appropriate environmental responsibilities are included.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- b. Review performance standards for select personnel (line managers and operations staff) to verify that environmental performance is a written criterion.
 - c. Determine, through interviews, whether performance appraisals appropriately measure environmental performance for both environmental staff and non-environmental staff.
- 3) Personnel responsible for environmental management are held accountable for their performance and the performance of those they manage.
- a. Determine if awards are available for environmental activities or actions.
- 4) A group independent of line management with responsibility for policy and standards development and oversight and technical support has been established. This group has the authority and management support to implement their responsibilities.
- a. Determine whether responsibilities of these support groups are clearly defined.
 - b. Identify who:
 - Establishes organization-wide environmental policy and standards;
 - provides environmental oversight of line organizations;
 - provides technical support for line organizations.
 - c. Determine how these environmental support groups fit into the overall organizational structure. Note the organizational placement of environmental support groups and whether they are independent of line management.
 - d. Determine whether these groups have appropriate levels of authority.
 - e. Determine if environmental managers have been successful in implementing past initiatives.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.
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Phase 3

Section 34

Assessing Environmental Programs Environmental Commitment

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

1. Performance Objective

The organization should exhibit a commitment to environmental excellence demonstrated by top management support, line management accountability for environmental performance, and formal environmental policy.

2. Key Evaluative Concerns

The focus of this audit discipline is the commitment to environmental excellence exhibited throughout the organization -- from top management through line management and staff. Top management support is critical to ensure environmental excellence and is necessary to emphasize the importance of and commitment to the organization's environmental goals. Top management support is evaluated based on demonstration of commitment to environmental programs and performance.

The existence of overall and issue-specific environmental policies is essential to establish both a framework for and a direction to the organization's environmental expectations. The organization's environmental policy will be evaluated in terms of comprehensiveness, compliance with environmental requirements, and provisions for environmental excellence that go beyond regulatory requirements.

Finally, to achieve environmental excellence, all personnel must take personal responsibility for environmental performance. Line management's commitment is evaluated based on the sense of responsibility for environmental protection shown by managers and operating personnel at all levels and in all functions.

3. Criteria

A. Top Management Support

- 1) Top management clearly communicates its commitment to environmental protection through the issuance of formal statements and policies that explicitly state environmental goals and expectations, with full compliance as a minimum goal.
 - a. Determine whether top management's commitment to environmental protection has been stated in mission statements, annual reports, general environmental policy or other broadly disseminated materials.
 - b. Determine whether top management includes environmental protection in internal or external speeches.
- 2) Top management demonstrates its commitment to environmental excellence through personal and managerial actions.
 - a. Determine whether routine senior management meetings include discussion of environmental issues/programs.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- b. Determine if top management has supported environmental programs through sufficient allocation of resources (financial, technical) (Linkage with Section 38 & Section 40).
 - c. Identify personal actions that provide evidence of top management support, for example:
 - Initiation of environmental programs/projects;
 - participation in professional associations;
 - work with local community organizations; and
 - participation in self-assessment reviews.
 - d. Determine whether senior management has a clear set of goals and expectations regarding environmental performance and what they are (e.g., environmental compliance as a minimum expectation, goals that go beyond compliance, emissions reductions, etc.).
 - e. Compare explicit goals to apparent implicit goals and identify any conflicting messages.
 - f. Identify how senior management communicates its environmental goals and expectations to employees and, typically, how frequently the goals are communicated.
- 3) Top management's commitment is demonstrated through required routine reporting regarding environmental performance and the status of environmental initiatives. (Linkage with Section 37)
- a. Determine what formal reports are routinely prepared for top management and to what extent they address the organization's environmental status or performance.
 - b. For these reports, identify to whom they are sent, the type of information conveyed, and the level of detail provided.
 - c. If environmental information is not included in routine management reports, investigate whether top management utilizes or relies upon any informal means for determining the organization's environmental status or performance. If yes, identify the means and how it works.
 - d. Check for any formal written requests from top management for information on environmental status or performance.
- 4) Senior managers have a basic understanding of and appreciation for environmental requirements relevant to the scope of the operations for which they are responsible.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- a. Through interviews, determine if senior managers understand general regulatory requirements, and have knowledge of internal environmental programs and responsibilities.
 - b. Determine what training or background these managers have related to environmental management.
- 5) Top management encourages openness and is receptive to input on environmental issues from all employees, as well as from the public at large. (Linkage with Section 37)
 - a. Identify mechanisms by which employee input has been encouraged and identify examples.
 - b. Seek evidence that employee input is considered in environmental decisionmaking.
 - c. Identify mechanisms by which public input has been encouraged and identify examples.
 - d. Determine whether public input is considered in environmental decisionmaking.
- 6) Top management has created a culture of compliance, awareness, teamwork, and line responsibility for environmental management.
 - a. Based on input from other members of the Assessment Team, determine if such a culture exists in the organization and how this culture was established.
 - b. Determine top management's role in encouraging or discouraging such a culture.

B. Environmental Policy

- 1) A formal environmental policy statement that has been issued from a high enough level of authority within the organization to communicate its importance.
 - a. Determine the existence of and review the organization's formal written statement of environmental policy.
 - b. Identify the individual and level within the organization from which the policy statement was issued.
- 2) Environmental compliance is formally established as the minimum acceptable standard.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- a. Review the environmental policy statement, and identify its principal environmental goals and objectives.
 - b. Determine whether the policy statement satisfies the Federal agency's goal of achieving environmental excellence.
 - c. Note whether implementation guidance or other supplemental, subsidiary statements clarify how the organization intends to meet its policy objectives.
- 3) The organization has established issue-specific policies for the major environmental issues consistent with the scope of its operations.
- a. Determine whether the organization has issued any additional, issue-specific policies addressing more focused environmental concerns, e.g., underground storage tanks, PCBs, groundwater protection, hazardous waste, air emissions, NEPA, etc.
 - b. Assess whether issue-specific policies are consistent with the overall environmental policy.
- 4) Environmental policies are widely distributed, easily accessible, and understood throughout the organization.
- a. Identify how environmental policies are communicated.
 - b. Based on interviews, determine the level of awareness and understanding of environmental policies.

C. Line Management Support

- 1) Individuals throughout the organization recognize the environmental aspects of their job responsibilities, and take personal responsibility for and demonstrate a sense of "ownership" of environmental protection.
- a. Determine line management's sense of personal responsibility for environmental performance.
 - b. Determine whether line operating personnel and functional personnel understand how their individual jobs affect the organization's environmental performance and whether they make any specific connections between the two.
 - c. Note specific instances which reveal management or staff attitudes or beliefs regarding the importance of their contribution to good environmental performance.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- d. Determine whether attitudes and behavior of management reinforce the message that line operating personnel are primarily responsible for ensuring good environmental performance.
 - e. Determine the organization's sense of the relative importance of the roles of operating personnel and environmental staff in determining environmental performance.
- 2) Managers at all levels have formally stated and demonstrated their commitment to environmental excellence.
- a. Identify and review managers' statements of this commitment, for example:
 - Memoranda;
 - records of formal meetings; or
 - bulletin board postings.
 - b. Identify actions that provide evidence of environmental commitment.
- 3) Managers at all levels and in all functions whose activities may impact environmental performance take responsibility and interest in limiting the environmental impacts of their operations.
- a. Identify activities in which line managers are involved, for example:
 - They routinely observe field level compliance activities;
 - participate in audits and self-assessments;
 - write and review procedures; or
 - serve on environmental advisory committees.
 - b. Determine what kind of environmental information line managers solicit and receive and how they obtain this information.
 - c. Review internal memos relevant to environmental management activities and manager meeting minutes to assess their level of involvement.
 - d. Determine what actions have been taken by line management in response to environmental accidents and occurrences.
- 4) Management and staff cooperate fully and openly with internal and external oversight groups. (Linkage with Section 33 and Section 37)
- a. Based on interviews with internal environmental staff and external oversight organizations, determine whether the relationship between the two is cooperative or adversarial.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Phase 3

Section 35

Assessing Environmental Programs Environmental Protection Programs

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

1. Performance Objective

Programs should be in place to ensure compliance with applicable Federal, state, and local environmental protection laws and regulations, and internal Federal agency policies that are designed to protect the environment and public health and welfare.

2. Key Evaluative Concerns

The purpose of this assessment discipline is to evaluate the extent to which the organization has developed and implemented specific environmental protection programs and plans which, if properly managed, should help maintain compliance and ensure movement towards environmental excellence. This category will be evaluated based on the existence, quality, and effectiveness of specific programs, including all necessary program elements.

Whereas the other protocol areas evaluate specific characteristics and elements of environmental management systems, this discipline will evaluate the implementation of these systems for issue specific environmental programs.

3. Criteria

A. Specific Environmental Protection Programs

- 1) For each of the EPP programs (as a minimum, these tested in Phase 2) determine whether a program is necessary and whether existing programs are sufficient to identify, quantify, and control risks.
 - a. Determine whether applicable environmental programs include the following program elements:
 - formal policies and plans;
 - identification and characterization of sources;
 - understanding of applicable regulatory requirements;
 - responsibilities;
 - implementation procedures;
 - recordkeeping and reporting systems;
 - training; and
 - program evaluation and oversight.
 - b. Evaluate the effectiveness of the organization's environmental programs
- 2) Effective environmental protection programs are in place to identify, control, and monitor air emissions.
- 3) The organization has a program for the protection of surface waters, including:
 - a. Identification of discharge points and sources;

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- b. applicable discharge permits, monitoring program, an effective Spill Prevention, Control, and Countermeasures Plan; and
 - c. reporting and recordkeeping systems.
- 4) The organization has a program for the protection of potable water supplies (including backflow prevention systems).
 - 5) The organization has determined and documented the need for site specific groundwater protection programs. When necessary, a groundwater monitoring program has been established to address the needs of specific sites.
 - 6) Programs are in place for the proper management and control of toxic and chemical materials to prevent or minimize their release into the environment, including programs for:
 - a. Procurement, handling, and storage of toxic and chemical materials;
 - b. management and control of polychlorinated biphenyls;
 - c. management and control of pesticides;
 - d. management and control of petroleum, petroleum products, and chemicals in aboveground or underground storage tanks; and
 - e. containment or removal of asbestos.
 - 7) The organization has a program for the management of solid, hazardous, and radioactive waste, including:
 - a. Waste source identification;
 - b. waste characterization;
 - c. waste acceptance criteria, where appropriate;
 - d. treatment, storage and disposal practices;
 - e. contingency plans;
 - f. recordkeeping systems;
 - g. training;
 - h. waste minimization, and

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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- i. a formalized pollution prevention program as outlined in relevant executive orders.
- 8) Programs are in effect that provide for environmental radiation protection through adherence to ALARA principals. Additional programs are in place that require:
 - a. Radiological environmental surveillance;
 - b. evaluation of unplanned releases of radioactive materials; and
 - c. evaluation of radiation exposure to the public.
- 9) The organization has a program to identify, remove, and/or routinely monitor underground storage tanks.
- 10) The organization has a program for compliance with Federal agency requirements for implementing NEPA, including screening/review and determination of the appropriate level of NEPA documentation for each proposed action.
 - a. Identify the system to assess the acceptability of contractors preparing NEPA documentation.
 - b. Determine whether environmental evaluations or checklists are used to initially screen every proposed action.
 - c. Identify the criteria and process used to recommend the level of NEPA documentation to the appropriate Federal agency authority for determination.

B. Specific Program Plans

- 1) The responsible field organization has prepared and routinely updated formal program plans for the following:
 - a. Groundwater protection management;
 - b. waste minimization; and
 - c. pollution prevention awareness.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- 2) The organization has developed an environmental monitoring and surveillance plan.
 - a. Determine whether the organization has a monitoring plan and whether it addresses all environmental monitoring needs and requirements relevant to the organization.

C. Other Programs Related to Environmental Protection

- 1). A program is in place to plan and effectively implement all actions required to manage responses to releases of hazardous substances to the environment from inactive waste sites or to releases of reportable quantities of hazardous materials.
 - a. Determine whether the organization has formal written emergency response plans, such as SPCC Plan, etc. as required.
 - b. Assess whether these plans are clear, complete, and current as to who has the Emergency Coordinator responsibility, what emergency response equipment is available and where, and whether the emergency response procedures are site-specific.
 - c. Determine whether staff have received appropriate training in planned emergency response procedures. Does the organization hold periodic drills or other readiness exercises.
 - d. Review emergency response plan documents, internal records of emergency response drills, other readiness exercises conducted.
- 2) The organization has developed and implemented preventive maintenance programs to ensure proper operation of pollution control equipment. (Linkage with Section 40)
 - a. Determine what has been the operating experience of this organization over the past year with respect to pollution control equipment outage, needed repairs.
 - b. Assess whether the organization has preventive maintenance programs in place and functioning for any critical operating and pollution control equipment.
 - c. Determine whether preventive maintenance schedules are automated or how responsible personnel know when a particular planned maintenance activity is to be performed.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- c. Determine whether preventive maintenance schedules are automated or how responsible personnel know when a particular planned maintenance activity is to be performed.
- 3) The organization has emergency preparedness plans such as contingency plans, Spill Prevention, Control, and Countermeasures plans, and a general emergency plan that addresses any potential hazard including natural disasters, fire, explosions, etc.
 - a. Verify that emergency response plans and programs include all applicable elements, including roles and responsibilities, procedures, training, and equipment.
 - b. Determine whether crisis management responsibilities are defined at all organizational levels.
 - c. Review responsibilities in the emergency response plan against organizational charts and general responsibilities.
- 4) A Quality Assurance Program and organization is in place to assure that environmental programs provide adequate protection to the environment and to public health, and that environmental data are representative and defensible.
 - a. Determine whether environmental measurement activities are conducted following EPA-approved methods and procedures.
- 5) A P2 plan outlines a facility's environmental future with respect to all environmental impacts and compliance programs.
 - A. Pollution Prevention Plan Development Steps
 - Develop P2 goals;
 - Obtain Management commitment;
 - Establish a P2 team;
 - Develop a baseline;
 - Identify P2 activities and opportunities;
 - Develop criteria and rank the activities and opportunities; and
 - Conduct management review.
 - B. P2 Plan - a P2 program is a road map describing:
 - P2 activities;
 - The status of activities in progress;
 - P2 goals; and
 - Reductions achieved through P2 activities.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Phase 3

Section 36

Assessing Environmental Programs Environmental Commitment

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb. 96.

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NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

1. Performance Objective

Formal systems and procedures should be in place to manage day-to-day environmental compliance. This includes systems to track and understand regulatory requirements, procedures for implementation of policies and programs, routine inspections, and systems for recordkeeping and reporting.

2. Key Evaluative Concerns

In this audit discipline, the formality of environmental programs and supporting management systems for ensuring compliance will be evaluated. This discipline complements the Environmental Protection Programs discipline by focusing on the formal systems and controls that are in place to assure compliance of day-to-day operations. The assessment team will assess the existence and effectiveness of a formal system for tracking, interpreting, and distributing relevant regulatory requirements. The organization will also be evaluated on its implementation of environmental programs through specific guidance procedures and standards. The organization's system for the conduct of routine inspections to identify and prevent problems will be evaluated. Finally, systems for the maintenance and retention of records as well as assurance of necessary reporting will be assessed.

3. Criteria

A. Regulatory Tracking and Translation

- 1) A formal system is in place to routinely track and interpret new and/or changes to Federal, state, and local regulations and Federal agency policies for the organization.
 - a. Determine how the organization stays current with new and emerging environmental regulations and trends.
 - b. Identify who within the organization is responsible for regulatory tracking.
 - c. Determine how new regulations are interpreted as to their applicability to the organization and by whom. Determine the role of the legal department in this task.
 - d. Determine whether the organization has a formal system for ensuring that new requirements are incorporated into existing programs, policies, and procedures.
 - e. Note the availability of regulatory reference material (compilations such as BNA, automated access via software, etc.), technical books, and other reference materials.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- 2) There is a process to ensure that guidance on new regulatory requirements is incorporated into organization or site-specific standard operating procedures, as appropriate.
 - a. Determine if there is a formal system in place to update environmental programs and procedures to reflect changes in regulatory requirements.
- 3) Relevant regulatory information is routinely distributed to field organizations in a timely manner.
 - a. Determine how and in what form regulatory information is transmitted to the field.
 - b. Determine whether the right people learn of the developments with sufficient lead time to take appropriate action.
- 4) Field organizations are provided sufficient guidance for compliance with new regulations or policies in the form of guidance documents, sample plans and procedures.
 - a. Determine how this guidance is provided and by whom, such as through guidance manuals, training, memorandum, etc.
 - b. Determine the level of guidance provided to the field along with regulatory distribution, and assess the adequacy of this guidance.
 - c. Interview field personnel and obtain their opinion of the adequacy of guidance.

B. Procedures

- 1) The organization has a formal, controlled process for reviewing, creating, updating, and approving new procedures.
 - a. Develop an understanding of this process, including types of approval, responsibilities, etc.
 - b. Test the system by identifying a sample of procedures to determine if they have been reviewed and updated. Test also by identifying a new regulatory requirement and determining whether a procedure has been created and approved.
- 2) Procedures and standards are issued from an organizational level with the authority to mandate implementation. (Linkage with Section 33)

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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- a. Identify who issues environmental standards and their level of authority within the organization.
 - b. Assess whether the level of procedure issuance is sufficient to ensure implementation.
- 3) Formal standards and procedures have been developed for the implementation of specific environmental protection programs.
- a. Determine whether the organization has written procedures for environmental activities associated with specific environmental programs, for example, inspections, reporting, emergency response, NEPA.
 - b. Review a sample of program specific procedures to assess the quality and adequacy of instruction.
 - c. Evaluate the process to review the technical content and adequacy of NEPA documentation.
- 4) There are procedures to ensure that any activities that might impact the environment are reviewed for environmental protection considerations.
- a. Determine whether standard operating procedures include environmental protection standards.
 - b. Determine whether the organization has a system to ensure that all procedures are reviewed and revised to include environmental protection considerations (Linkage with Section 40).
- 5) Procedures are part of a formal, auditable document control system designed to ensure that personnel have ready access to current versions of procedures containing environmental requirements.
- a. Develop an understanding of how procedures are organized and controlled, for example, whether procedures are centrally located or at each individual operating site, and whether they are controlled using a manual or computerized system.
 - b. Determine which environmental procedures are routinely accessible at the facility level.
 - c. Verify accessibility by requesting a sample of specific procedures.
- 6) The organization has implemented a system to periodically review and update environmental procedures.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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- a. Determine how often procedures are reviewed and updated and by whom.
- b. Determine how revised or updated procedures are communicated/distributed to the rest of the organization.
- c. Determine whether there is a requirement for periodic review of procedures by users.

C. Routine Facility Inspections

(Linkage with Section 35 and Section 39)

- 1) The organization has a program for routine site and equipment inspections and compliance checks, including appropriate documentation.
 - a. Determine whether environmental or other staff conduct occasional or routine inspections to determine compliance with specific environmental legal and regulatory requirements, and check the frequency of these inspections.
 - b. Determine whether regular tests and inspections are performed on critical operating and pollution control equipment, (e.g., electrostatic precipitators, scrubbers, air monitors, or environmental measurement devices).
 - c. Determine whether these inspections follow a formal written protocol or checklist.
 - d. Determine whether results of inspections are documented and retained. Review documentation of a sample of routine inspections.
- 2) The organization has a formal system for follow-up of exceptions noted in inspections, which is supported by management review.
 - a. Develop an understanding of the follow-up system and responsibilities.
 - b. Determine if there is a process for reporting exceptions to management.
 - c. Determine whether management reviews inspection documentation and corrective actions.
 - d. Determine if there is a tracking process to ensure the corrective actions or repairs are taken in a timely manner.
 - e. Determine whether the organization has a system in place to minimize repeated exceptions as noted in inspections (e.g., through root cause analysis).

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

D. Recordkeeping and Reporting
(Linkage with Section 33 and Section 35)

- 1) Systems are in place for the appropriate documentation and recordkeeping of environmental performance.
 - a. Develop an understanding of all systems that are in place for recordkeeping and document control.
 - Tracking of key regulatory schedules (e.g., permit renewals, report submissions, required training.).
 - Maintenance of compliance records (e.g., inspection logs, source and/or ambient measurement data.).
 - Preparation and submission of required regulatory reports (e.g., RCRA generator report, hazardous material inventory and release reports, PCB inventory and disposal report.).
 - b. Determine whether the organization maintains appropriate documentation and records of environmental inventories, permits, and environmental performance for the following programs:
 - Water pollution control;
 - air pollution control;
 - hazardous waste management;
 - reportable spill incidents;
 - PCB inventory and disposal;
 - Toxic Substance Control Act Section 8(c) and 8(e) files;
 - training; and
 - EPA.
 - c. In general, assess the state of the organization's files and recordkeeping practice regarding these environmental records. Determine whether the files are complete, current, and readily accessible.
 - d. Determine the extent to which environmental information management is automated or manual.
 - e. Determine whether recordkeeping practices are formal and systematic.
- 2) The organization has a document control system and record retention policy.
 - a. Determine whether the organization has a formal records retention policy which covers environmental compliance and other related environmental information. In lieu of a formal policy, are guidelines provided to staff regarding environmental records retention.
 - b. Assess whether individuals are knowledgeable of the record retention policy.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.
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- c. Where applicable, verify that the organization retains environmental records for the retention period specified by regulation.
 - d. Determine whether the system has the capability to track the status of NEPA compliance for planning, funding, approval, design, and construction phases of all proposed actions.
 - e. Determine whether the system accounts for classified documentation, if necessary.
- 3) There are systems in place to ensure that environmental reports required by Federal and state regulations and Federal agency policy are routinely prepared and submitted on a timely basis.
- a. Determine how the organization ensures that environmental reports required by Federal or state regulation are routinely prepared and submitted to the appropriate regulatory agencies in a timely manner.
 - b. Assess the effectiveness of the system by checking some reporting requirements such as the following:
 - Annual hazardous waste generator reports have been submitted to appropriate state or Federal EPA.
- 4) Environmental status reports with the appropriate level of detail are routinely prepared for internal management purposes and for reporting environmental concerns to higher levels of management in a timely manner. (Linkage with Section 33 and Section 34)
- a. Identify what kind of reports are prepared, and determine the content and frequency of these reports.
 - b. Determine whether these reports include the full range of environmental issues/activities.
 - c. Determine whether other systems for conveying environmental information are in place (regular meetings, reports, self assessments, etc.).
 - d. Note whether environmental status information includes an appropriate level of detail to sufficiently inform senior management.
 - e. Note whether environmental status reports compare accomplishments to goals.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- 5) There are formal mechanisms to investigate, report, correct, track, and monitor trends in environmental problems and "incidents." The types and magnitudes of the problems that should be reported are well defined. (Linkage with Section 39)
- a. Determine whether the organization has a formal written procedure for environmental incident investigation and reporting.
 - b. Review files of investigation reports to determine whether root causes of problems and incidents are identified and trended and whether there have been recurring problems.
 - c. Determine whether corrective actions have been planned and implemented for these incidents.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Phase 3

Section 37

Assessing Environmental Programs Internal and External Communication

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

1. Performance Objective

Formal and informal channels of communication should be utilized to facilitate implementation of all environmental management systems and programs; to emphasize management commitment to environmental protection; to generate a sense of environmental awareness throughout the organization; and to manage relationships with external oversight organizations and others who are likely to be concerned with the success of the organization's environmental protection efforts.

2. Key Evaluative Concerns

The focus of this audit discipline is an evaluation of internal and external communication systems. The effectiveness of internal communication systems will be determined through an evaluation of the understanding of roles and responsibilities and the awareness of environmental policies, procedures, and programs throughout the organization. The extent and effectiveness of external communications will be assessed based on consistency of the external dialogue, monitoring of external concerns, and external recognition of the organization's environmental commitment.

3. Criteria

A. Internal Communications

- 1) Environmental information is effectively communicated through formal or informal means throughout the organization (top-down, bottom-up, and lateral).
 - a. Determine whether these formal channels exist and in what form (reports, meetings, memoranda, etc.).
 - b. Determine whether there are regular line management and environmental staff meetings that adequately cover environmental issues.
 - c. Evaluate the flow of communication between line management and operating staff, as well as between various functional areas.
- 2) There is a formal system in place to allow personnel to anonymously communicate (without retribution) environmental concerns to upper levels of management for resolution.
 - a. Determine whether such a system exists, how it works, to whom concerns are reported, and what type of action is taken.
 - b. Determine whether personnel at various levels in the organization are aware of its existence.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- c. Note any evidence that the system is used, and whether it is considered useful.
 - d. Evaluate demonstrated management support for the system.
- 3) Informal channels of internal communication are encouraged as a means of developing cooperation and commitment to environmental protection.
- a. Identify the informal modes of communication used in the organization and assess their effectiveness.
 - b. Determine whether environmental staff across programs, facilities, and units share information and assist each other on environmental problems.
- 4) Environmental awareness is continually reinforced throughout the organization via the use of newsletters, bulletin boards, videotapes, office-wide programs, or other means. (Linkage with Section 37)
- a. Identify communication modes used to promote environmental awareness.
 - b. Note observations of environmental awareness promotion throughout the facility.
 - c. Compare environmental awareness to health and safety awareness for perspective.
- 5) Formal communication of environmental protection directives is timely, and effectively reaches all responsible elements of the organization. (Linkage with Section 33 and Section 36)
- a. Determine how quickly the following types of environmental information is communicated to management:
 - Routine environmental status information;
 - incident or major issue information; and
 - controversial issues requiring NEPA.
 - b. Determine how quickly new environmental requirements, programs or other information is communicated to the field.
- 6) Employee environmental concerns are solicited and addressed, and both the concerns and responses are documented.
- a. Identify employee environmental concerns that have and have not been addressed.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- b. For those that were addressed, note the organization's response, and whether the concerns were documented.
 - c. For those that were not addressed, identify reasons why.
 - d. Note whether well-founded concerns expressed in one facility or group are shared with other facilities or groups that might have similar problems.
- 7) The effectiveness of communication is demonstrated by a widespread awareness and acceptance of the organizational commitment to environmental protection. (Linkage with Section 34)
- a. Through interviews, assess the general understanding and appreciation for environmental issues exhibited by organization employees.
- 8) Effective working relationships exist between headquarters and field environmental staff as well as between staff and line personnel whose functional responsibilities impact environmental performance.
- a. Check for close working relationships between environmental staff, line management and other key functional specialists within the organization, (e.g., engineering, legal, purchasing).
 - b. Note any examples where networking by environmental staff with these other professionals has resulted in decisions or actions which have increased the effectiveness of the environmental management function.
 - c. Note any evidence of lack of cooperation between line and oversight groups.

B. External Communication

- 1) The organization has a good working relationship and cooperates fully and openly with external oversight organizations.
 - a. Determine whether the organization has frequent, proactive interaction with regulatory agencies and keeps them informed of the environmental status of the organization.
 - b. Determine whether the relationship between environmental staff and external oversight organizations appears cooperative or adversarial, based on interviews with representatives of both.
 - c. If appropriate, interview regulatory representatives to obtain their perspective of the working relationship.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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- 2) The organization has defined who will be the internal points of contact with external parties, and has identified the points of contact within appropriate external parties.
 - a. Identify the key internal points of contact for interaction with external organizations.
 - b. Determine whether the organization has identified points of contact in external organizations.
- 3) A program exists for communicating with external parties such as regulatory agencies, environmental groups, and the local community to provide them with information the opportunity to be involved in key decisions related to environmental protection.
 - a. Determine what kinds of communication programs the organization has with the local community. (e.g., community relations plan, education, visitation of facilities, public reading rooms, etc.)
 - b. Based on interviews with facility staff, assess how the organization interacts with environmental groups.
 - c. Identify any complaints from neighbors and determine how the organization handles them.
 - d. Identify recent key decisions by the organization that have related to environmental protection. Determine whether external agencies, organizations, or individuals were provided the opportunity to be involved.
 - e. Based on interviews with regulatory agencies, environmental groups, and representatives of the local community, determine whether external organizations perceive that they have had such opportunities.
- 4) Formal communication of environmental risks and protection efforts occurs frequently, is timely, and effectively reaches external organizations, including regulatory agencies, environmental groups, and representatives of the local community.
 - a. Evaluate whether environmental risks and protection efforts are communicated to such contacts routinely or only on an infrequent basis. Note whether the information is timely.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- b. Based on outside interviews, determine whether the information is received and is perceived to be comprehensible. Determine whether recipients believe they are being kept up to date on the organization's activities that may impact environmental performance.
- 5) The environmental concerns of external parties are addressed, and both the concerns and responses are documented.
 - a. Review files to determine whether external concerns have been documented and addressed.
 - b. For those that were addressed, note the organization's response, and whether the concerns were documented and trended.
- 6) The effectiveness of communication is demonstrated by a widespread external recognition of the organization's commitment to environmental protection.
 - a. To the extent possible, determine the recognition of this commitment among regulatory agencies, environmental groups, and representatives of the local community.
- 7) The organization periodically assesses the effectiveness of external communications, makes changes as necessary, and documents the results of the evaluations and changes made.
 - a. Determine how the organization assesses effectiveness and what changes have resulted from such an evaluation.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Phase 3

Section 38

Assessing Environmental Programs Staff Resources, Training, and Development

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.
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NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

1. Performance Objective

Programs should be in place to ensure that staff resources are sufficient to effectively develop and implement the organization's environmental protection programs. The organization should have a formal program in place to ensure that all personnel have received environmental protection training appropriate for their job responsibilities. The organization should also provide staff development and career advancement opportunities for environmental staff.

2. Key Evaluative Concerns

In this assessment discipline, the Assessment Team will determine whether environmental staffing resources are sufficient from a quantitative and qualitative perspective to properly address the organization's environmental risks. Job responsibilities and performance appraisal processes will be reviewed for evidence of the importance of individual environmental performance. The degree of formality, completeness, and appropriateness of the organization's systems for identifying and satisfying environmental skills training needs and for providing opportunities for career development will also be assessed.

3. Criteria

A. Environmental Staffing

- 1) Environmental staffing levels are sufficient to achieve environmental performance goals. This includes dedicated environmental support staff and others with collateral duties (e.g., line managers with other support functions).
 - a. Determine how the organization assesses environmental staffing needs.
 - b. Determine whether staffing is in line with identified needs.
 - c. Determine whether requests for additional environmental staff have been approved or denied and why.
 - d. Identify environmental programs or projects that have not been undertaken or completed because of insufficient environmental staff.
 - e. Note any other evidence of insufficient environmental staff to assure compliance, e.g.,
 - compliance deficiencies whose root causes are inadequate resources;
 - excessive overtime; or
 - excessive use of contractors.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- 2) Personnel with environmental responsibilities have the relevant background and training to carry out their responsibilities.
 - a. Determine what qualifications are necessary for environmental staffing and other positions with environmental responsibilities.
 - b. Review a sample of resumes for selected environmental staff and note the following:
 - Educational training in environmental management;
 - diplomas and certifications of environmental training (internal and external); and
 - relevant work experience in environmental management.
 - c. Environmental support staff demonstrate sufficient knowledge and familiarity with the organization's operations, environmental issues, and programs and procedures to effectively carry out their respective environmental protection responsibilities.
- 3) Staffing for environmental protection activities is provided in a timely manner.
 - a. Determine whether additional staff with environmental responsibilities are added as the need arises or whether there is a significant delay.
 - b. Determine whether environmental activities requiring immediate attention (e.g., a spill or a determination of environmental non-compliance) are responded to in a timely manner.
- 4) A system is in place to identify both short-term and long-term environmental staffing requirements, both within the environmental support group and within line units with environmental responsibilities.
 - a. Determine how short- and long-term environmental staffing requirements are determined.
 - b. Determine whether this staffing assessment includes both the environmental support staff and line management needs.

B. Job Descriptions and Performance Evaluations
(Linkage with Section 33 B.)

- 1) Appropriate job descriptions are established and maintained for environmental positions.
 - a. Review formal written job descriptions for environmental staff to determine

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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- whether they are current, complete, and reflective of existing duties.
- b. Identify other positions in each department that include environmental responsibilities. Review the formal written job descriptions for these other key line management and operating personnel and assess whether these job descriptions incorporate any statements regarding their environmental-related duties and responsibilities.
- 2) Performance standards used in the performance appraisal process include the environmental aspects of individual job responsibilities, including line management responsibilities for environmental performance. Environmental factors are given comparable emphasis to safety and productivity factors.
- a. Determine whether explicit measures of performance have been identified for specific jobs, including both environmental staff and line management personnel.
 - b. Determine whether environmental criteria receive substantially less emphasis than other criteria such as productivity and safety.
 - c. Determine whether periodic staff performance reviews include explicit measures of environment-related job performance. Note examples of environmental performance criteria used.
- 3) Good environmental performance is rewarded in practice, and poor performance is penalized.
- a. Identify reward, incentive or bonus systems (financial or nonfinancial) for environmental staff and other personnel with environmental responsibilities.
 - b. Determine what actions are taken for poor environmental performance.
 - c. Identify other methods used for praise or corrective action such as verbal feedback, memorandums, internal announcements, etc.

C. Environmental Training Programs

- 1) Environmental training programs are defined in controlled documents such as a training program manual.
 - a. Understand how environmental training requirements are determined and where they are explicitly identified, e.g., training plans.
 - b. Determine if a training manual or other documents describe environmental training programs.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- 2) There is a process in place to identify and evaluate environmental training needs for all personnel. These needs are incorporated into individual professional development plans.
 - a. Determine whether the organization has assessed its environmental training needs including type of training and staff requiring it.
 - b. Determine whether environmental skill training requirements (e.g., regulatory hazardous materials handling, emergency and spill response) have been identified for all job classifications where employees' work activities can affect environmental performance.
 - c. Determine whether environmental training is included in job descriptions and/or individual professional development plans.
 - d. Determine how the organization ensures that employees receive the necessary training at appropriate intervals.
- 3) The environmental training program is supported by appropriate training materials and qualified trainers.
 - a. Review training materials and determine whether the materials (e.g., written, audiovisual) are appropriate and adequate to the purpose.
 - b. Review resumes of trainers and determine whether the trainers have the appropriate educational background and experience for the particular training they deliver.
- 4) There is a formal process to ensure that training courses are developed at an appropriate depth and provide adequate coverage of Federal and state regulations, and internal policies and procedures.
 - a. Develop an understanding of the process for ensuring that all relevant regulatory requirements are covered in training courses.
- 5) All levels of personnel -- from operators to lower, middle, and upper management -- undergo some level of environmental awareness training. (Linkage with Section 34)
 - a. Determine who receives environmental awareness training.
 - b. Determine whether environmental awareness training is given to all line personnel whose activities may impact environmental management and compliance, as well as to their supervisors.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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- c. Determine what environmental training and awareness activities, if any, the organization specifically directs toward middle and upper level management.
 - d. Determine whether contractors are included in awareness training.
- 6) Environmental protection training is included in new employee and contractor orientation training, and environmental protection training requirements have been established for temporary employees and visitors.
- a. Determine whether the organization routinely conducts a formal orientation program for all new employees and contractors, and assess the adequacy of the training content.
 - b. Review training records to determine if all new employees and contractors have attended orientation training.
- 7) Training activities are documented and the training recordkeeping system is auditable, complete, and current.
- a. Determine how the organization maintains employee environmental training records and who is responsible for this activity.
 - b. Identify certain training required by regulations (e.g., hazardous waste training, etc.) and determine whether all individuals performing these tasks have had the necessary training.
 - c. Select a sample of environmental and non-environmental employees and review training records to determine if they are accurate, complete, and current.
 - d. For these same individuals, compare actual training completed with training needs identified for their position or in their individual staff development plan.
 - e. Assess whether the training recordkeeping system is easily accessible, complete and current.
- 8) There is a formal documented process for the periodic evaluation of the effectiveness of training programs.
- a. Determine whether and how evaluations of the training program are conducted.
 - b. Review the results of the latest evaluation and check changes made in response to the evaluation.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- c. Interview selected personnel regarding their training and determine whether training was absorbed.
- d. Determine whether training feedback mechanisms (e.g., tests, course feedback forms) are provided to evaluate effectiveness of training.

D. Staff Development Opportunities

- 1) The organization provides career opportunities and advancement for environmental staff within the program, where possible, or in other programs/facilities.
 - a. Determine whether well-established career paths exist within the environmental management function. Identify these paths, and determine whether they can lead to top management positions or whether they eventually reach "dead-ends."
 - b. Identify line positions that are of the same government grade (or that are shown in the organization's hierarchy to be at the same organizational level) as the various environmental support positions.
 - c. Determine whether environmental support personnel and these "line peers" are considered equally eligible for lateral job changes that provide breadth of experience, and for advancement up the organization's management ladder. To gather evidence, ask senior management, line management, supervisors of environmental support personnel, line personnel, and environmental support personnel.
 - d. Identify any middle or senior management staff that have environmental support experience.
- 2) In staff development efforts, environmental support staff are encouraged to acquire management and professional skills in order to build their supervisory and management potential.
 - a. Through interviews with environmental support staff, determine whether they are encouraged and given opportunities to acquire management skills.
 - b. Compare training records of environmental support personnel and "line peers" to see whether training in skills necessary for promotion up the management ladder are offered equally to both groups. Examples of such training include managerial skills, supervisory competencies, presentation techniques, media relations, policy/program development, and negotiation skills.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- 3) Cross-functional training is available and encouraged to maintain and expand staff capabilities.
 - a. Determine what kinds of programs exist to perform cross-functional tasks or to move from one department to another in an effort to expand staff skill base.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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Section 39

Assessing Environmental Programs Program Evaluation, Reporting and Corrective Action

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

1. Performance Objective

The organization should have self-assessment and oversight programs in place to effectively evaluate environmental protection activities, anticipate and report environmental concerns, and implement corrective actions. The major objective of self-assessment programs is to establish accountability and excellence at the "grassroots" level, thereby involving people who are the most familiar with the operations and their management. Self-assessment is a continual line management activity that acquires, assimilates, documents, and reports through all levels of an organization on the effectiveness, adequacy, efficiency, and economy of its activities. Self-assessment should establish a culture of accountability and continuous improvement as well as foster excellence in all program activities.

2. Key Evaluative Concerns

The purpose of this audit discipline is to evaluate programs that assess the design adequacy and implementation effectiveness of environmental protection systems as well as the reporting and follow up activities associated with these appraisals. Program evaluation includes a review of all major audits; appraisals; and self-assessments. It does not include routine inspections, which are addressed in the Formality of Programs section of this protocol.

Programs will be evaluated on the basis of its design and implementation to ensure adequate breadth and depth of coverage. Reporting and follow-up will be assessed for adequacy of formal systems to clearly communicate in a timely fashion the results of the reviews to appropriate levels of management. Finally, the system for periodic trends analysis of all findings to identify underlying programmatic and management deficiencies will be evaluated.

3. Criteria

A. Self-Assessment and Appraisal Programs

The depth of detail required and the magnitude of resources expended for self-assessment should be commensurate with the element's relative importance to environmental compliance and/or other facility-specific requirements. Self-assessment should incorporate both internal self-assessments and independent technical and management appraisals.

- 1) Facilities and departments have implemented on-going formal, written programs which include both internal assessments and independent oversight appraisals.
 - a. Determine whether these programs include appropriate elements/components, such as:
 - Formal program charter;
 - comprehensive scope;
 - defined schedules;
 - standard operating procedures for self-assessment;
 - formal reporting system;

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- root cause analysis;
 - formal corrective action system;
 - formal process to identify trends;
 - formal mechanisms to communicate root causes, trends, and lessons learned throughout the organization;
 - formal self-assessment training program;
 - full cooperation with external oversight or assessment organizations; and
 - line management-fostered atmosphere of continual self-evaluation and quality improvement.
- b. Determine whether the organization has a formal, documented environmental self-assessment program.
 - c. Determine whether the program covers compliance with internal policies and procedures, applicable governmental laws and regulations, and best management practices.
 - d. Determine whether subordinate offices and facilities have a self-assessment program.
 - e. Identify the environmental programs (e.g., air, surface water, drinking water, groundwater, hazardous and solid waste, etc.) that are evaluated in self-assessments.
 - f. Determine responsibilities, frequency, and process for conducting self-assessments.
 - g. Determine whether self-assessment activities are integrated both within the line organization and across staff functions to ensure a comprehensive self-assessment process.
- 2) Responsibilities and authorities for self-assessment activities are clearly defined. (Linkage with Section 35)
 - a. Determine who is responsible for implementing the self assessment and appraisal programs.
 - b. Determine if these individuals are sufficiently independent and have enough authority to effectively perform this responsibility.
 - c. Determine whether organizational staff are specifically dedicated to environmental appraisals or if not, how the organization staffs appraisals.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- 3) Frequency of self-assessments and appraisals is congruent with the program's goals.
 - a. Determine how frequently self-assessments and appraisals are conducted and how the organization determines frequency schedule.
 - b. Assess whether this frequency is sufficient to meet program goals.
- 4) Focused functional appraisals are conducted on specific issues to reduce the organization's long-term environmental liabilities. (Linkage with Section 40).
 - a. Determine whether the organization has a system to identify problem areas that require focused assessments.
- 5) Audits/appraisals are conducted by professionals who are trained and qualified.
 - a. Determine how assessors are selected and what qualifications or criteria are used in the selection process.
- 6) Audits/appraisals are conducted using formal, written guidance documents and are documented.
 - a. Determine whether guidance documents, audit protocols, checklists, and other tools are used in the preparation and conduct of the self-assessments and appraisals.
 - b. Determine whether notes are taken during the audits and retained for future reference.
- 7) Self-assessment program implementation is addressed in budget planning and budget requests (Linkage with Section 40).
 - a. Determine whether environmental self-assessments have been factored into strategic planning in terms of resource and budgetary requirements.
- 8) The systems used for environmental program evaluations are periodically critiqued and modifications are made as necessary.
 - a. Determine what system is in place to review environmental program evaluations.
 - b. Determine how often these programs are evaluated.
 - c. Identify changes made to the assessment program as a result of program review.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

B. Reporting and Follow-up

- 1) Assessment results are documented in formal reports distributed in a timely manner to appropriate levels of management.
 - a. Identify all self-assessments and appraisals that have been conducted over the last few years and determine if reports were prepared.
 - b. Review past self-assessment and appraisal reports. Identify level of reporting detail and individuals on distribution list. Assess whether reports reach high enough levels of management and wide distribution to related functions (e.g., legal, engineering, etc.). Assess whether reports provide adequate detail.
- 2) Corrective actions to address root cause of findings are developed and implemented by line management.
 - a. Determine how corrective actions are prioritized.
 - b. Corrective action plans are approved by both the oversight group and senior management prior to implementation.
 - c. For each self-assessment/appraisal that has been conducted, determine if a corrective action plan was developed by the appropriate department, approved by management, and implemented.
- 3) Corrective actions are independently tracked to ensure their completion, objectively verified at completion, and formally closed out.
 - a. Determine whether the organization and field offices have a system to track progress of corrective actions.
 - b. Assess the adequacy of progress on existing corrective action plans.
- 4) "Lessons learned" programs are implemented to seek out improvement opportunities for environmental performance.
 - a. Determine whether the organization has developed a program or system for learning from past problems, and sharing this information across the organization.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- 5) Trending analysis of findings is conducted on a periodic basis to identify underlying programmatic or management root causes.
 - a. Determine if any trending analysis is conducted and how frequently.
 - b. Review the results of these analyses and inquire about actions taken to correct root causes.
- 6) Performance indicators for environmental protection have been defined and are tracked and analyzed for trends.
 - a. Determine what performance indicators have been established.
 - b. Determine how performance indicators are tracked and analyzed for trends.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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Section 40

Assessing Environmental Programs Environmental Planning and Risk Management

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

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NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Performance Objective

The organization should plan for environmental management activities to ensure that environmental resources needs are adequately addressed and the organization's environmental goals can be met. Planning for environmental protection should be integrated with planning for other organizational functions.

The organization should have a formal system to identify environmental hazards, assess the resulting environmental risks of those hazards, and mitigate risks.

2. Key Evaluative Concerns

This assessment discipline focuses on the environmental planning and risk management process. It evaluates the extent to which technical and financial planning related to environmental management is conducted and integrated with overall organizational planning. In addition, this discipline addresses the organization's system for identifying, assessing, and addressing potential environmental risks, including risk management program design and approach, issues identification, and management involvement.

3. Criteria

A. Environmental Planning and Budgeting

- 1) Environmental planning is conducted with comparable formality to planning for other organizational functions and includes both short- and long-term planning.
 - a. Determine the extent to which environmental planning decisions result from a formal, organized planning process.
 - b. Determine the frequency of formal environmental planning and the planning horizon (e.g., 1 year, 5 years, 10 years).
 - c. Compare how staffing and budgetary requirements for the environmental management function and for other organizational functions are determined.
 - d. Determine whether environmental planning is viewed as a strategic element in the organization's long-term success.
 - e. Determine whether the facility has a system to identify projects planned in the next year or two that will need NEPA review.
 - f. Determine if the facility utilizes the A-106 planning process and semi-annually updates its prioritized environmental requirements and submits them to EPA for review.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- g. Agency Environmental Plan is developed in accordance with EPA guidance contained in Federal Agency Environmental Management Program Planning and forwarded to EPA for formal review prior to being forwarded to OMB, in accordance with E.O. 12088 and OMB Circular A-106.
- 2) Environmental protection considerations are adequately included in planning for other organizational functions.
 - a. Review strategic and/or organizational plans, annual budget documents, proposed major capital projects, and property acquisitions and determine whether they include environmental considerations.
 - b. Identify any recent instances where environmental concerns raised through a program/project planning process have influenced proposed operating plans, financial plans, or other factors.
 - 3) Environmental issues are represented by qualified personnel in key strategic and operations planning meetings/committees.
 - a. Review minutes of planning meetings to determine if environmental personnel were involved.
 - b. Determine whether environmental issues were considered in planning meetings or activities.
 - 4) In the planning process, the organization has a system for establishing priorities and weighing competing factors, with environmental protection receiving equal weight to production.
 - a. Assess whether priority setting (i.e., selecting projects for budget) reflects environmental excellence goals.
 - b. Investigate environmental projects that have been delayed or canceled. Determine if these projects received equal consideration to other projects.
 - c. Determine whether plans for environmental management take into account and adequately reflect the implications of proposed operating and financial plans and initiatives.
 - d. Assure that all environmental projects are reviewed to ensure that assigned priorities reflect guidance issued by EPA in Federal Agency Environmental Management Program Planning and are reported to OMB in the Agency annual plan.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- 5) Commitment of funds for environmental-related activities is satisfactory to serve the organization's environmental performance goals, through both capital and maintenance projects.
 - a. Compare capital budget requests and annual budget allocations for environmental programs/projects to determine whether adequate funds have been committed to environmental protection.
 - b. Determine whether all environmental items, including staff and technical resources, have been identified in budget requests.
- 6) Environmental protection is an integral part of the budget and planning process.
 - a. Review budget requests and allocations for line operations and other functional areas to determine if they include environmental costs.
 - b. Determine whether environmental concerns are taken into consideration in budget decisions.
 - c. Ensure that all project funding necessary to comply with environmental standards is included in Agency budget plans and reported in the annual agency OMB environmental plan to EPA in accordance with Federal Agency Environmental Management Program Planning guidance.
- 7) The organization has assessed its needs for pollution control technologies and other technical equipment to achieve its performance goals.
 - a. Determine how the organization assesses its technical equipment needs to maintain compliance and reduce risks.
 - b. Identify programs or systems to keep updated on the latest pollution control technology and ensure that best available technology is used for maintaining compliance and reducing risks.
 - c. Determine whether environmental excursions and noncompliances are analyzed to identify whether technology can be improved to eliminate or reduce similar episodes in the future.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- 8) The organization has a system in place for the control and oversight of purchased materials, equipment, and services supporting environmental protection activities to ensure that they meet environmental specifications .
 - a. Determine how the organization ensures that new chemicals, equipment or contractors meet regulatory requirements and comply with organizational policies on environmental protection.

B. Risk Management

- 1) A formal environmental risk management program has been established and is operational. This program includes objectives, approach, procedures and risk evaluation criteria.
 - a. Identify the elements of the organization's risk management program and determine if the program is complete.
 - b. Review internal guidelines or criteria, quantitative or qualitative, used to determine whether a particular environmental risk arising out of operations would be deemed "acceptable" or "unacceptable".
- 2) A formal, systematic review of the organization's operations/activities is periodically conducted to identify and manage environmental risks.
 - a. Develop an understanding of and assess the process used to evaluate risks.
 - b. Determine how often these reviews are conducted, and by whom.
 - c. Determine what actions have been taken to mitigate or manage identified risks.
- 3) The organization has developed programs or standards to manage environmental risks not covered by regulatory requirements. (Linkage to Section 35)
 - a. Identify examples of how risk assessment has led to the development or enhancement of environmental protection programs.
- 4) All new projects, programs, or activities that may impact the environment are carefully reviewed to identify and address environmental risks as early as possible. A formal project/program review and approval process, which includes environmental considerations, has been established. (Linkage with Section 40. I.B.)

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

- a. Besides NEPA, identify what types of projects have environmental reviews performed, e.g., capital projects, R&D projects, facility-level maintenance modifications.
- b. Determine whether these reviews are performed only under certain circumstances or routinely for all projects.
- c. Determine the focus of the reviews and whether the project may raise any significant environmental compliance issues, or lead to any potentially significant environmental risks.
- d. Determine whether project environmental reviews typically follow a standard approach and whether there is any formal guidance on the approach.
- e. Identify the criteria used for assessing the impacts of a project (e.g., dollar value, project type, etc.).
- f. Review records or files of environmental reviews that have been performed.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Phase 3

Appendix

Selecting Documents to Review and Individuals to Interview for Environmental Management Assessments

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

The following discussion provides suggestions, by protocol discipline, for the most useful types of documents to review and general types of individuals to interview in the process of performing an Environmental Management Assessment.

Organizational Structure

The following types of individuals should be interviewed for this protocol area:

- *Representatives from the Federal agency's site office* as well as *subcontractors* to determine roles, responsibilities, reporting relationships, authorities, and level of coordination;
- *Environmental, health and safety (EHS) staff and top management* at the facility to determine the reporting "distance" between the person with primary responsibility for environmental support and the overall management of the organization; and to assess the appropriateness of layers of management and span of control; and
- *EHS and line staff* to understand the functional relationship of EHS to other parts of the organization; and to determine the organizational stature of the EHS office within the organization.

The following types of documents should be reviewed:

- Documents that define organizational responsibility, authority, or accountability for environmental programs;
- Organizational charts;
- Position or job descriptions for line and staff personnel;
- Environmental planning documents; and
- Formal measures used in assessing job performance.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Environmental Commitment

The following types of individuals should be interviewed for this protocol area:

- *Top management* to determine level of knowledge, personal involvement in environmental affairs, and inclusion of environmental issues in routine senior management meetings.
- *Management and line staff at all levels and across all functional areas* to determine level of environmental commitment, sense of "ownership" of environmental protection, degree to which environmental policies are distributed and understood, and allocation of human, financial, and technical resources.
- *Staff in non-environmental specialty areas* to determine the level of general environmental awareness.

The following types of documents should be reviewed:

- Environmental planning documents;
- general environmental policy statements;
- issue-specific policies addressing focused environmental concerns;
- environmental program descriptions and implementation plans;
- senior management statement of support for environmental programs, including reports, speeches, and newsletters;
- accounts of employee or organization involvement in or work with environmental task forces, environmental professional associations, or local community organizations;
- samples of routine environmental reports to upper management; and
- minutes of senior management meetings.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Environmental Protection Programs

The following types of individuals should be interviewed for this protocol area:

- *EHS staff and line management as well as subcontractors* to determine level of development or implementation of environmental programs or plans.

The following types of documents should be reviewed:

- Environmental monitoring and surveillance plans;
- source and emission inventories for air and water pollution control;
- NESHAPs agreement;
- toxic and chemical materials management plan;
- emergency response and remedial action plan;
- environmental incident reporting procedures;
- preventative maintenance and inspection procedures;
- reports to management or regulatory agencies; and
- opportunity assessments.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Formality of Environmental Programs

The following types of individuals should be interviewed for this protocol area:

- *Personnel responsible for tracking relevant environmental regulations* to determine if the organization is up-to-date on new, proposed, and emerging regulatory issues.
- *Personnel responsible for the development and implementation of procedures and standards* to determine the level of congruence with Federal agency's policies.
- *Personnel responsible for conducting routine site walk-through inspections and following-up on inspection findings* to determine adequacy of the system.
- *Personnel responsible for record-keeping and document control* to assess the document control system.

The following types of documents should be reviewed:

- Policies and procedures relating to project and field office implementation of environmental requirements;
- environmental protection plans;
- standard operating procedures for the site;
- regulatory tracking protocols and procedures;
- inspection checklists and logs; and
- examples of a variety of environmental records and reports, including incident and environmental performance reports.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Internal and External Communication

The following types of individuals should be interviewed for this protocol area:

- *Personnel responsible for communication of environmental information* (e.g., goals, performance, policies, and procedures) to understand how formal and informal communication channels are used.
- *Management and line staff* to determine extent to which environmental information is distributed within the organization.
- *Important external stakeholders*, such as environmental groups, state and Federal environmental regulators, and Federal agency management to determine extent of communication with and knowledge of the facility.

The following types of documents should be reviewed:

- Samples of the scope of environmental management reports;
- staff meeting minutes;
- internal newsletters which contain environmental information;
- forms and guidelines for internal anonymous reporting of environmental issues;
- documentation of information provided to and awareness programs for external stakeholders; and
- press releases relating to environmental issues.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Staff Resources, Training, and Development

The following types of individuals should be interviewed for this protocol area:

- *Personnel responsible for securing an adequate level of environmental staffing* to understand to assess the system to identify short- and long-term environmental staffing and resource requirements.
- A sample of *management and line staff at all levels* of the organization to determine if there is an adequate level of staffing for environmental functions and to determine the level of environmental training throughout the organization.
- *Training office personnel* to assess the training program and the process to evaluate and establish the organization's training needs.
- *Career development office personnel* to identify career opportunities for environmental staff.

The following types of documents should be reviewed:

- Documented requests and justifications for additional staff with environmental responsibilities;
- hiring plans;
- a sample of resumes for environmental and non-environmental staff who have environmental responsibilities;
- training program manuals;
- training records for a range of individuals within the organization, including environmental support personnel and their "line peers";
- job descriptions and performance criteria for line management and operating personnel; and
- individual professional development plans.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Program Evaluation, Reporting, and Corrective Action

The following types of individuals should be interviewed for this protocol area:

- *Personnel responsible for conducting and/or managing the self-appraisal process* to assess the design of the process.
- *Top management* to determine how self-appraisal information is used within the organization.
- *A sample of managers and line staff responsible* for implementing corrective actions.

The following types of documents should be reviewed:

- Formal descriptions of the oversight program or process, including responsibilities of key staff;
- self-appraisal program budget allocation;
- audit and appraisal reports;
- corrective action plans;
- documentation of follow-up activities for corrective actions; and
- trend analysis and performance indicator reports.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Environmental Planning and Risk Management

The following types of individuals should be interviewed for this protocol area:

- *Environmental planning personnel* to evaluate budgeting, priority-setting and allocation of resources activities.
- *Staff with the budgeting office* to determine if environmental planning is integrated with other organizational planning functions (e.g., development of operating and capital budgets).
- *Risk management personnel* to evaluate the adequacy of systems to identify and minimize environmental hazards.

The following types of documents should be reviewed:

- Short- and long-term business plans and strategic plans;
- formal risk management documents, such as readiness review plans or risk assessments; and
- environmental risk tracking and trending reports.

NOTE: Appendix 6-1 is an excerpt from the USEPA Generic Protocol, Feb 96.

Appendix 6-2

List of Categorical Exclusions (CX) and Screening Criteria (AR 200-2, Appendix A))

List of CXs

1. Normal personnel, fiscal, and administrative activities involving military and civilian personnel (recruiting, processing, paying, and recordkeeping).
2. Law and order activities performed by military police and physical plant protection and security personnel, excluding formulation and/or enforcement of hunting and fishing policies, or regulations that differ substantively from those in effect on surrounding non-Army lands.
3. Recreation and welfare activities not involving offroad recreational vehicle management.
4. Commissary and post exchange (PX) operations, except when hazardous material is stored or disposed.
5. Routine repair and maintenance of buildings, roads, airfields, grounds, equipment, and other facilities, except when requiring application or disposal of hazardous or contaminated materials.
6. Routine procurement of goods and services, including routine utility services.
7. Construction that does not significantly alter land use, provided the operation of the project when completed would not of itself have significant environmental impact; this includes grants to private lessee for similar construction (REC required).
8. Simulated war games and other tactical and logistical exercises without troops.
9. Training entirely of an administrative or classroom nature.
10. Storage of materials other than ammunition, explosives, pyrotechnics, nuclear, and other hazardous or toxic materials.
11. Operations conducted by established laboratories within enclosed facilities where:
 - a. all airborne emissions, waterborne effluents, external radiation levels, outdoor noise, and solid bulk waste disposal practices are in compliance with existing Federal, state, and local laws and regulations
 - b. no animals that must be captured from the wild are used as research subjects, excluding reintroduction projects (REC required).
12. Development and operational testing on a military installations, where the tests are conducted in conjunction with normal military training or maintenance activities so that the tests produce only incremental impacts, if any, and provided that the training and maintenance activities have been adequately assessed, where required, in other Army environmental documents (REC required).

(continued)

Appendix 6-2 (continued)

13. Routine movement of personnel; routine handling and distribution of nonhazardous and hazardous materials in conformance with DA, USEPA, DOT, and state regulations.
14. Reduction and realignment of civilian and/or military personnel that fall below the thresholds for reportable action as prescribed by statute of AR 5-10 (REC required).
15. Conversion of commercial activities to contract performance of services from in-house performance under the provisions of DODD 4100.15.
16. Preparation of regulations, procedures, manuals, and other guidance documents that implement, without substantive change, the applicable HQDA or other Federal agency regulations, procedures, manuals, and other guidance documents that have been environmentally evaluated.
17. Acquisition, installation, and operation of utility and communication systems, data processing, cable, and similar electronic equipment that use existing rights-of-way, easements, distribution systems, and facilities.
18. Activities that identify, or grant permits to identify, the state of the existing environment (for example, inspections, surveys, and investigations) without alteration of that environment or capture of wild animals.
19. Deployment of military units on a temporary duty (TDY) basis when existing facilities are used and the activities to be performed have no significant impact on the environment (REC required).
20. Grants of easements for the use of existing rights-of-way for use by vehicles: electrical, telephone, and other transmission and communications lines; transmitter and relay facilities; water, wastewater, stormwater, and irrigation pipelines, pumping stations, and facilities; and for similar public utility and transportation uses (REC required).
21. Grants of leases, licenses, and permits to use existing Army controlled property for non-Army activities, provided there is an existing land-use plan that has been environmentally assessed and the activity will be consistent with the plan (REC required).
22. Grants of consent agreements to use a Government-owned easement in a manner consistent with existing Army use of the easement; disposal of excess easement areas to the underlying fee owner (REC required).
23. Grants of licenses for the operation of telephone, gas, water, electricity, community television antenna, and other distribution systems normally considered as public utilities (REC required).
24. Transfer of real property administrative control within the Army to another military department or other Federal agency, including the return of public domain lands to the Department of the Interior and reporting or property available for outgranting; and grants of leases, licenses, permits and easements for use of excess or surplus property without significant changes in land use (REC required).

(continued)

Appendix 6-2 (continued)

25. Disposal of uncontaminated buildings and other improvements for removal offsite (REC required).
26. Studies that involve no commitment of resources other than manpower (REC required).
27. Study and test activities within the procurement program for Military Adaptation of Commercial Items for items manufactured in the United States (REC required).
28. Development of table organization and equipment documents, no fixed location or site.
29. Grants of leases, licenses, and permits to use DA property for or by another governmental entity when such permission is predicated upon compliance with NEPA (REC required).

Screening Criteria

1. A CX is a category of actions that do not individually or cumulatively have a significant effect on the human environment and for which, therefore, neither an EA nor an EIS is required.
2. A CX may be used only when the criteria of paragraphs 4-1 and 4-2 of AR 200-2 have been applied and each of the following are true:
 - a. This action is not a major Federal action significantly affecting the quality of the human environment.
 - b. There are minimal or no individual or cumulative effects on the environment as a result of this action.
 - c. There is no environmentally controversial change to existing environmental conditions.
 - d. There are no extraordinary conditions associated with this project.
 - e. This project does not involve the use of unproven technology.
 - f. This project involves no greater scope or size than is normal for this category of action.
 - g. There is no potential of an already poor environment being further degraded.
 - h. This action does not degrade an environment that remains close to its natural condition.
 - i. There are no threatened or endangered species (or critical habitat), significant archeological resources, National Registered or National Register eligible historical sites, or other statutorily protected resources.
 - j. This action will not adversely affect prime or unique agricultural lands, wetlands, coastal zones, wilderness areas, aquifers, floodplains, wild and scenic rivers, or other areas of critical environmental concern.

Appendix 6-3

Noise Zones in Noise Zone Maps

ICUZ Zone	Percent Population Highly Annoyed	A-Weighted Day-Night Sound Level ADNL (dB)	C-Weighted Day-Night Sound Level CDNL (dB)
I	< 15	< 65	< 62
II	15 - 39	65 - 75	62 - 70
III	> 39	> 75	> 70

Appendix 6-4

Calculation of dB Factor to be Added to Helicopter Sound Exposure Levels

Slant Distance (m)	Factor (dB)
0-200	7
200-300	5
300-400	3
400-500	1
500 and longer	0

Appendix 6-5

Definitions of USEPA Class and Compliance Status of Projects

CLASS I

Project Assessment = HIGH

Compliance Status: CMPA, INOV, ESDP

USEPA Class Number 1

Projects required to meet the provisions of assigned compliance agreement or consent order; project required to correct deficiencies found on a USEPA or state inspection; other projects needed to come into compliance when statutory/regulatory deadlines have passed.

CLASS II

Compliance Status: ESDF, PSDF

USEPA Class Number 2

Project needed to meet future compliance deadlines for which planning must have already started.

CLASS III

Compliance Status: ESRO, ESRE, ESDL, OTHR

USEPA Class Number 3

All other projects which, while important, are not related to imminent compliance requirements.

Appendix 6-6

Pollutant Categories for the A-106 Pollution Abatement Plan/RCS 1383 Report

Correlation Between TEAM Guide Sections and A-106/RCS-1383

Section		Title	Related A-106/RCS 1383 law/reg Codes
1	A	Air Emissions Management	CAA, CWA
2	C	Cultural Resources Management	CULT
3	HM	Hazardous Materials Management	RCRA, MULT
4	HW	Hazardous Waste Management	RCRA
5	NR	Natural Resource Management	NATR
6		Other Environmental Issues	
	O1	The NEPA Process	NEPA
	O2	Environmental Noise	NCA
	O3	Installation Restoration Program	SFND
	O4	Pollution Prevention	PRVN
	O5	Program Management	MULT
7	PM	Pesticide Management	FIFRA
8	PO	Petroleum, Oil, and Lubricant (POL) Management	CWA, RCRA
9	SO	Solid Waste Management	RCRA
10	ST	Storage Tank Management	RCRA, CAA, CWA
11		Toxic Substances Management	
	T1	Polychlorinated Biphenyls (PCB)	TSCA
	T2	Asbestos	CAA
	T3	Radon	CAA
	T4	Lead-Based Paint (LBP)	RCRA
12	WA	Wastewater Management	CWA
13	WQ	Water Quality Management	SDWA

(continued)

Appendix 6-6 (continued)

A-106/RCS 1383 Codes

Law/Regulation	Pollutant Category	Code
CAA	Asbestos	ASBS
	Control of Toxic Air Pollutants	CTAP
	Control of Volatile Organic	CVOC
	Emissions Inventories	EINV
	Mobile Sources	MOBL
	National Ambient Air Quality Standards/ Point Source Control	NAQP
	National Emission Standards for Hazardous Pollutants	NEHP
	Ozone Depleting Chemicals	ODCS
	Pollution Prevention	POLP
	Permits (fees and applications preparations and modification costs)	PRMT
	Radon	RADN
	State Implementation Plan Requirements	SIPS
	Training	TRNG
CWA	Estuaries	ESTU
	Marine Sanitation Devices	MSDV
	Nonpoint Source	NPTS
	Pollution Prevention	POLP
	Point Source Control (Section 402)	PSCS
	Permits (fees and applications preparations and modification costs)	PRMT
	Pre-Treatment	PTRQ
	Spill Prevention, Control and Countermeasures Plan	SPCC
	Stormwater Point Source	SWPS
	Training	TRNG
	Toxic Water Pollutants (Section 304)	TWPS
	Wastewater Treatment	WWTR
	Wetlands (Section 404)	WLND
TSCA	Storage and Disposal of PCBs	PCBS
	Training	TRNG
FIFRA	Pollution Prevention	POLP
	Pesticide Storage, Application and Disposal	PSAD
	Training	TRNG

(continued)

Appendix 6-6 (continued)

Law/Regulation	Pollutant Category	Code
RCRA	Corrective Action (Section 3004 u & v)	CORA
	Closure Plans (Section 6008)	CPLN
	Hazardous Waste Disposal Costs	DISP
	Generator Requirements	GENR
	Groundwater Monitoring Installation	GWMI
	Hazardous Waste Storage and Disposal	HAZD
	Hazardous Waste Management Plans	HWMP
	Pollution Prevention	POLP
	Permits (fees and applications preparations and modification costs)	PRMT
	Recycling Programs	RCYP
	Landfills	SUBD
	Solid Waste Management Plans	SWMP
	Transportation Requirements	TRAN
	Training	TRNG
	Underground Storage Tanks (General)	USTS
	Underground Storage Tank Upgrade	USTU
	Underground Storage Tank Sire Remediation	USTR
	Underground Storage Tank Permits and Fees	USTP
	Waste Minimization	WMIN
SDWA	Lead in Drinking Water	PBDW
	Primary Drinking Water Standards	PDWS
	Pollution Prevention	POLP
	Permits (fees and applications preparations and modification costs)	PRMT
	Secondary Drinking Water Standards	SDWS
	Training	TRNG
	Underground Injection Control	UNIC
	Wellhead Protection	WLHP
Superfund (SFND)	Feasibility Study	FEAS
	Operating Units and Long-Term Monitoring	OPLM
	Preliminary Assessment/Site Investigation	PASI
	Pollution Prevention	POLP
	Remedial Action	REMA
	Remedial Design	REMD
	Remedial Investigation	RINV
	Removal Action	RMVA
	Training	TRNG
Noise Control Act (NCA)	Construction	NCON
	Noise Control Planning	NPLN
	Training	TRNG

(continued)

Appendix 6-6 (continued)

Law/Regulation	Pollutant Category	Code
NEPA	Environmental Impact Assess. and Docn. Specific Projects	EAIS
	Mitigation Measures Required by Record of Decision	MITM
	Training	TRNG
Cultural and Historic Resources (HPA)	Archeological Resources	ARCH
	Historic Preservation	HIST
	Restoration Activities	MITM
	Training	TRNG
Natural Resources Management (NATR)	Agricultural/Grazing Outleases	AGRM
	Forest Management	FSTM
	Land Management	LNDM
	Mitigation Measures	MITM
	Training	TRNG
	Wetlands	WLND
Endangered Species Act (ESA)	Endangered Species Investigations	ENDG
	Mitigation Measures	MITM
	Training	TRNG
Environmental Program Management (MULT)	Auditing	AUDT
	Mixed Wastes	MXDW
	Program Management	PGMT
	Training	TRNG
Atomic Energy Act (ATOM)	Radioactive Wastes	RADW
Pollution Prevention (PRVN)	Pollution Prevention	POLP
	EO 12856 Requirements	PPRO
	Pollution Prevention Funded from nonenvironmental accounts	POTH

Appendix 6-7

Activities Eligible for DERA Funding (AR 200-1, para 9-4b)

1. Investigations to identify, confirm and determine the risk to human health and the environment; feasibility studies; remedial action plans and designs; and removal or remedial actions.
2. Research, development, and technology demonstrations necessary to conduct cleanups.
3. Expenses associated with cooperative multi-party cleanup plans and activities.
4. Remedial actions to protect or restore natural resources damaged by contamination from past hazardous waste disposal activities.
5. Cleanup of low level radioactive waste sites which have been identified as IRP sites.
6. Management expenses associated with the IRP, Management expenses are those overhead costs required for the adequate program oversight and management, including indirect costs as defined in the FAR Section 31.203.
7. Operation and maintenance costs for the first 10 yr of operations or remedial systems and monitoring systems.
8. Immediate actions necessary to address health and safety concerns such as providing alternative water supplies or treatment of contaminated drinking water, when the hazard results from a release from DOD property.
9. Studies to locate USTs not used since January 1984, activities to determine whether a release has occurred, and cleanup of contamination.
10. Response to releases from in-service tanks discovered during initial integrity testing per 40 CFR 280 where testing is conducted prior to the regulatory date of 22 December 1993. (Request Components provide support for this alternative and estimate of impact (i.e., additional funding requirements).)
11. CERCLA response actions necessary prior to excess of real property assets, excluding requirements associated with BRAC I or BRAC II installations.
12. CERCLA response actions and RCRA corrective actions approved in FFA/IAGs for NPL sites where DERA is identified as the sole source of funding.
13. CERCLA response or corrective actions at sites identified in the DERPMIS as of 30 September 1990, including RCRA SWMUs and regulated units (treatment, storage and disposal (TSD) units that require permits). Corrective actions and other requirements at TSD units identified after 30 September 1990 must be funded by component appropriations.
14. Corrective actions at solid waste management units required by 3004(u), (v) and 3008(h) of RCRA.
15. Studies and support for RD&D of innovative and cost effective technologies for cleanup of hazardous waste sites, for DOD-unique wastes or other techniques widely applicable to DOD.
16. Support services provided by another agency in accordance with 10 USC 2701(d).

Activities Not Eligible for DERA Funding

1. Closing or capping sanitary landfills unrelated to a hazardous waste cleanup action.
2. RCRA closures at units that have met final construction standards and are associated with permitted and currently operating waste generation and disposal facilities.
3. Construction of hazardous waste storage, transfer, treatment or disposal facilities, except when part of an IRP response action.
4. Testing or repair of active USTs and costs of replacing leaking underground tanks.

(continued)

Appendix 6-7 (continued)

5. Costs of asbestos surveys, containment, removal or disposal, except when incidental to a DERP response action.
6. Cost of spill prevention and containment measures for currently operating equipment and facilities.
7. Cleanup costs of spills covered or required to be covered by spill prevention, control and counter-measure (SPCC) plans.
8. Costs of operation, maintenance or repair to hazardous waste treatment, storage, or disposal facilities which are currently in use (i.e., regulated or permitted), except when part of a DERP response action.
9. Costs of hazardous waste disposal operations, including associated management and operational costs, except when part of a DERP response action.
10. Overseas Environmental Restoration Activities.
11. State support services prior to 17 October 1986, past State costs not reasonably documented. State services in support of nonenvironmental Restoration Program funded cleanup activities or FUDS, unless approved by DASD(E).
12. Contingency response and closure at regulated units which meet standards under 40 CFR 264, and which have been issued a final operating permit under 40 CFR 270.
13. Improvements to meet facility operating standards under 40 CFR 264 standards at regulated units which meet interim standards (40 CFR 265).
14. Fines or other monetary penalties imposed by regulatory agencies.

Section 7

Pesticide Management (Active Army Supplement)

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SECTION 7

PESTICIDE MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

- AR 200-1, *Environmental Protection and Enhancement*. This AR, dated 23 May 1990, prescribes responsibilities, policies, and procedures to preserve, protect, and restore the quality of the environment.
- AR 420-76, *Pest Management*. This AR, dated 3 June 1986, provides policies, standards, and procedures for pest control activities at U.S. Army-controlled facilities. It sets minimum levels of pest management operations in real property maintenance activities (RPMA) and states that these operations are to be compatible with national environmental protection mandates.

B. Department of Defense (DOD) Directives

- DOD Directive (DODD) 4150.7, *Pest Management Program*. This directive, dated 24 October 1983, sets forth the policies, responsibilities, and procedures for pest management programs. This directive establishes the DOD policy of maintaining safe, efficient, environmentally sound, and integrated pest management programs to prevent or control pests that may adversely affect health or damage structures, material, or property. The DOD Plan for the Certification of Pesticide Applicators establishes the policies, criteria, and curriculum for granting certification of personnel.
- DODD 4160.21-M, *Defense Utilization and Disposal Manual*. Chapter 9, *Hazardous Property Management*, sets out guidance for the handling, processing, and disposing of hazardous property in accordance with applicable environmental, safety, and other laws and regulations.

C. Using the TEAM Guide for ECAS

- No additional instructions.

D. Key Army/DOD Compliance Requirements

- Pesticide Management Plan - Installations are required to have a Pesticide Management Plan which addresses all the pesticide application activities on the installation.
- Pesticide Applicators - Installation personnel who apply pesticides are required to be certified under the DOD plan for certification. They must also be participating in a medical surveillance program.
- Highly Toxic Pesticide Storage and Use - Storage facilities for pesticides and excess pesticides classed as highly toxic or moderately toxic that are labeled DANGER, POISON, or with the skull and crossbones symbol, should meet specific structural, operational, and storage requirements. These include pesticides being kept in a dry separate room with fire protection which is not near food or feed, and in containers in good condition with plainly visible labels. There should be decontamination facilities and the local fire department, hospitals, public health officials, and police departments should be notified in writing that the pesticides are being stored.

E. Key Army Compliance Personnel

- The Directorate of Public Works (DPW) will prepare a pest management plan, supervise and direct pest management operations, conduct preventive maintenance and surveillance inspections, ensure that operating personnel are adequately trained, maintain supplies of pesticides and related equipment, and assure that all pest management operations are done safely. In addition, the Facilities Engineer will decide which activities should be contracted out, perform all recordkeeping and reporting requirements of AR 420-76, notify heads of nonappropriated funds activities that restricted and controlled pesticides must be applied by under supervision of certified personnel, and cooperate with medical authorities.
- Preventive Medicine Office will: survey the pest population involved in health of the command and report the results to the facilities engineer; conduct the installation pesticide monitoring program; obtain timely identification and susceptibility of pests to pesticides as necessary and report to the facilities engineer; establish health and personnel safety criteria for pesticide operation; provide certification training; and assist the Major Army Command (MACOM) pest management consultant in conducting an onsite installation pest management program review.
- The Installation Pest Management Coordinator will be a pest management supervisor or professional pest management personnel member, will develop and monitor the installation pest management annual work plan, and will coordinate with activities conducting pest surveillance or applying pesticides to ensure that all applicable information is reported per AR 420-76.

F. Key Army/DOD Compliance Definitions

- None

G. Records To Review in Addition To Those Listed in TEAM Guide

- Installation pest management plan
- Staffing requirements for pest management program

H. Physical Features To Inspect in Addition To Those Listed in TEAM Guide

- Military unit storage/supply areas
- DPW/Department of Logistics (DOL) supply and storage areas
- Field sanitation training sites

I. People To Interview

- Environmental Coordinator (EC)
- Preventive Medicine Officer
- Fire Department
- Building and Grounds Division (DPW)
- Entomology Shop (DPW)
- Staff Judge Advocate (SJA)
- Golf Course Pesticide Shop

J. Guidance for Active Army Pesticide Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBER:
All Installations	PM.1.1.A through PM.1.10.A	7-5
Pesticide Applicators	PM.5.1.A through PM.5.3.A	7-9
Pesticide Applications		
General	PM.10.1.A through PM.10.3.A	7-11
Equipment	PM.15.1.A	7-13
Documentation	PM.40.1.A	7-15
Storage, Mixing, Preparation	PM.45.1.A through PM.45.19.A	7-17
Disposal	PM.55.1.A through PM.55.4.A	7-23

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PM.1 ALL INSTALLATIONS PM.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on pesticides, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP).	Verify whether copies of the following regulations, which are applicable, are kept at the installation: - 40 CFR 152, <i>Pesticide Registration and Classification Procedures.</i> - 40 CFR 165, <i>Regulations for the Acceptance of Certain Pesticides and Recommend Procedures for the Disposal and Storage of Pesticides and Pesticide Containers.</i> - 40 CFR 166, <i>Exemption of Federal and State Agencies for Use of Pesticides Under Emergency Conditions.</i> - 40 CFR 171, <i>Certification of Pesticide Applicators.</i> - EO 12088, <i>Federal Compliance with Pollution Standards.</i> - DODR 4145.19-1, <i>Storage and Materials Handling.</i> - DODD 4150.7, <i>Pest Management Program.</i> - DODD 4160.21-M, <i>Hazardous Property Management.</i> - AR 11-34, <i>The Army Respiratory Protection Program.</i> - AR 40-5, <i>Preventive Medicine.</i> - AR 200-1, <i>Environmental Protection and Enhancement.</i> - AR 385-32, <i>Protective Clothing and Equipment.</i> - AR 420-76, <i>Pest Management.</i> - TIM No.14, <i>Protective Equipment for Pest Control Personnel.</i> - TIM No.15, <i>Pesticide Spill Prevention and Management.</i> - TIM No.16, <i>Pesticide Fires: Prevention, Control and Cleanup.</i> - TIM No.21, <i>Pesticide Disposal Guide for Pest Control Shops.</i> - MIL-HDBK 1028/8A, <i>Design of Pest Management Facilities.</i> - applicable state and local regulations.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PM.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).	Determine what management systems are in place. Verify that the existing system addresses the issues associated with pesticides management by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented.
PM.1.3.A. The installation must have a Pest Management Coordinator (AR 420-76, para 2-4e and 2-8).	Determine whether a person has been designated to coordinate all installation pest management activities. Verify that this person is responsible for preparation of the pest management plan and the collection of the information necessary to prepare the DD Form 1532. Verify that this person oversees performance of pest control contracts.
PM.1.4.A. Each Army installation must have a comprehensive Installation Pesticide Management Plan (IPMP) (AR 420-76, para 2-31, 2-5a, and 3-2a).	Determine whether an IPMP has been prepared. Verify whether all installation activities and satellite sites that perform pest control have been included in the IPMP. Examples include: - Land Management Section - Forestry Section - Fish and Wildlife Section - Golf Course Grounds Maintenance - Grounds Section - Contract Pest Control - Greenhouses - Airfield Management - Clubs. Verify whether the IPMP has been reviewed and approved by the appropriate MACOM/AEC Pest Management Consultant (PMC). Verify whether the IPMP has been updated during the past year.

**COMPLIANCE CATEGORY:
PESTICIDE MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PM.1.4.A. (continued)	(NOTE: A plan is required whether the pest management operations are in-house or contractual.)
PM.1.5.A. The IPMP must address specific issues (DODD 4150.7, para F5 and AR 420-76, para 3-2b, and Appendix C).	Determine whether the IPMP contains a pest control worksheet for each pest control function. Verify whether each pest control worksheet contains: - objectives of control - surveillance on which control is based - control operations to be performed - precautions to be taken in sensitive areas - special health and safety measures required - manpower requirements. Determine whether the IPMP emphasizes integrated pest management procedures rather than spray schedules.
PM.1.6.A. DD Form 1532, <i>Pest Management Report</i> , must be submitted monthly or according to MACOM requirements (AR 420-76, para 4-4c(1) and 4-4c(3) through 4-4c(5)).	Determine whether the DD Form 1532, which reports pest control operations and pesticide use, is prepared monthly and distributed within 15 days of the reporting period. Verify whether the DD Form 1532 includes all installation pest control operations. Verify whether the DD Form 1532 records surveillance time (engineer, veterinarian, and preventative medicine (PVNTMED)). Verify that a copy of DD Form 1532 is sent to: - MACOM/AEC PMC - Installation PVNTMED Officer - USACHPPM (formerly AEHA).
PM.1.7.A. Contracts for installation pest control services must be reviewed and approved prior to advertisement for bid (AR 420-76, para 3-12c, 3-12d, 4-3a, 4-3c, and 4-3k).	Determine whether contracts for pest control services have been approved (preferably in writing) by the MACOM/AEC PMC. Verify whether contract pest control services are monitored by a DOD trained and certified Quality Assurance Evaluator (QAE). Verify whether contractor employees are certified (DOD certification is not required) to apply pesticides.

**COMPLIANCE CATEGORY:
PESTICIDE MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PM.1.8.A. A self-help pest control program must be available for use by housing occupants to control minor infestations of household pests (AR 420-76, para 2-3m and 3-13, and Appendix G). PM.1.9.A. The impact of the installation pest management program must be addressed in the installation Environmental Assessment (EA) or Environmental Impact Statement (EIS) (AR 200-2, para 5-3c and 420-76, para 3-8b and 3-10). PM.1.10.A. Facilities are required to store any pesticide, pesticide container, or pesticide residue according to specific restrictions (AR 420-76, para 4-2a(2) and 4-2a(3)).	Determine whether a self-help pest control program has been established. Determine whether housing occupants are required to make a self-help pest control effort before services from the installation pest control services are scheduled. Verify that housing occupants are being trained on the safe and proper use of self-help pesticides. Verify that the pesticides being distributed by self-help have been approved by the MACOM/AEC PMC. Verify that records are being maintained of pest control supplies issued and the records are provided to the pest management coordinator once a month to be included on the DD Form 1532-1. Determine whether the current installation EA or EIS addresses pest management operations. Verify whether EAs are on file for pest management operations that: - use a restricted-use pesticide - may have the potential to contaminate surface or groundwater - have more than 259 contiguous hectares (640 acres) treated - may affect endangered, threatened, or protected species or their habitat. Verify whether an EA and validation statement have been prepared in accordance with AR 40-574 before the aerial dispersal of pesticides. Verify that, if the installation does not have a current EA or EIS, the environmental impacts of pest management operations are being addressed as part of IPMP. Verify that pesticides, pesticide container, and/or pesticide residues are stored so that: - they are not inconsistent with labeling - food or feed contamination does not occur. Verify that pesticides or pesticide-related waste generated by the civilian community are not stored or turned in at the installation. (NOTE: These requirements are based on recommendations found in 40 CFR 165.7.)

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PM.5 PESTICIDE APPLICATORS PM.5.1.A. Government individuals who apply or supervise the application of pesticides are required to be certified under the DOD plan for certification of pesticide applicators (AR 420-76, para 3-1). PM.5.2.A. All government pest control personnel must be participating in a medical surveillance program (AR 40-5, para 10-15).	Verify that applicators are trained and certified if they: - are full time employees who perform pest management activities at least 25 percent of their on-duty time - apply restricted-use, state licensed, or controlled pesticides. Verify that part-time pesticide applicators (less than 25 percent on-duty time) who do not use restricted-use or controlled pesticides are trained in: - the safe efficient, and environmentally sound use of pesticides. - other integrated pest management techniques. Verify that the installation has an appropriate number of certified pesticide applicators required to perform pest management operations at the installation (see Appendix 7-1). (NOTE: Direct Supervision is defined as "acting under the instructions and control of a certified applicator who is available if and when needed, even though such certified applicator is not physically present at the time and place the pesticide is applied" (FIFRA, Section 2(e)(4)).) Determine whether all government pesticide applicators are participating in a medical surveillance program. (NOTE: Contract pesticide applicators should be in a medical surveillance program provided by their employer.) Verify whether the medical surveillance consists of, at a minimum: - annual physical examination - periodic blood cholinesterase tests. (NOTE: This requirement is based on recommendations found in 40 CFR 165.10(e)(2)(vi).)

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PM.5.3.A. Personal protective equipment and clothing must be provided, at employer (Army or contractor) expense (DODR 4145.19-1, para 3-415a(1) and 3-415(a)(6) through 3-415(a)(8), AR 11-34, para 3-5b(2), 385-32, and 4a, and 420-76, para 4-1c).	Verify that pesticide mixing and storage rooms are ventilated by a roof mounted, centrifugal fan providing a minimum of six air changes per hour. Verify that the mixing sink is equipped with a local exhaust system with minimum air velocity of 100 linear feet per minute at the face of the hood as recommended by the American Society of Industrial Hygienists. Verify that an emergency deluge shower and eyewash station are immediately available where pesticide mixing is occurring. Verify that personal protective clothing and equipment is provided and used by pest management personnel. The following equipment to be used, depends upon magnitude and type of operations: - respirators with pesticide approved cartridges - respirators with HEPA filters when performing rodent control operations - gloves - safety shoes - coveralls - self contained breathing apparatus - head covering - hearing protection - rubber boots - safety goggles or face shield. Verify that operations include health and safety procedures emphasizing good work habits, reduction or elimination of hazards, and use of personal protective equipment. Verify that laundering of protective clothing is provided by the installation or employer. Verify that protective clothing and equipment is stored separately from chemical areas. Verify that appropriate/approved respirators are being used when handling and applying pesticides. Verify that respirator cartridge/canisters are changed at appropriate intervals. Verify that a log of respirator cartridge/canister use is maintained. Verify that periodic fit testing of respirators is conducted. Verify that severely contaminated clothing is disposed of as pesticide waste.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PESTICIDE APPLICATIONS PM.10 General PM.10.1.A. Public safety should be ensured when applying or using pesticides (MP). PM.10.2.A. Pesticides for sale in post exchanges and commissaries must meet specific restrictions (AR 40-5, para 10-4h). PM.10.3.A. Post exchange and commissary personnel are required to be familiar with clean up procedures for pesticide spills (AR 40-5, para 10-4h(3)).	Confirm elimination of hazardous exposure to the general public by checking for the following: - appropriate signs for treatment area are posted - scheduling for low use periods or restricted usage for a number of days - water use restrictions and reentry times are followed according to the pesticide labels. Verify that pesticides for sale in post exchanges and commissaries are registered as general-use pesticides. Verify that no restricted-use pesticides or pesticides with labels indicating that only professional pest management personnel may use the product are sold in the post exchange or commissary (see TEAM Guide for a list of restricted-use pesticides). Verify that the pesticides are arranged separately on sales display shelves and in storage according to type. Verify that they are segregated from all food products. Verify that employees are familiar with cleanup procedures and a spill kit is available.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PESTICIDE APPLICATIONS PM.15 Equipment PM.15.1.A. Vehicles used for pesticide applications must be dedicated to pest control operations and meet specific design requirements (DODR 4145.19-1, para 3-415a(3) and AR 420-76, para 4-1d and 4-1e(1)).	Determine which vehicles are used for pesticide applications. Verify that vehicles used during pest control operations are single purpose. Verify that pest control vehicles have separate cab and cargo compartments. Verify that lockable storage is provided on the vehicles. Verify that spill cleanup kits are placed on vehicles. Verify that a portable eye wash is available for use on vehicles at remote application sites.

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**REGULATORY
REQUIREMENTS:**

**REVIEWER CHECKS:
May 1995**

**PESTICIDE
APPLICATIONS**

PM.40

Documentation

PM.40.1.A. Daily pesticide application and surveillance records are required (AR 420-76, para 4-4b).

Verify that DD Form 1532-1 is used to account for daily applications of pesticides.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PM.45 STORAGE, MIXING, PREPARATION PM.45.1.A. The pesticide storage and mixing facility must be included in the Spill Prevention, Control, and Countermeasure (SPCC) Plan (AR 200-1, para 8-4a(2)(d)). PM.45.2.A. Stored pesticides must be addressed in the Installation Spill Contingency Plan (ISCP) (AR 200-1, para 8-5). PM.45.3.A. Sites where pesticides are mixed and/or stored must meet specific requirements (AR 420-76, para 4-1b(1)). PM.45.4.A. Storage facilities for pesticides must meet specific structural and operating requirements (AR 420-76, para 4-1b(2)/III).	Verify that the SPCC Plan identifies the pesticide storage facility and addresses measures to prevent or minimize impact of a pesticide spill at the facility. Verify that the SPCC Plan includes an inventory of pesticides stored in the pesticide storage facility. Verify that the ISCP addresses procedures and techniques used to contain and clean up a pesticide spill at the pesticide storage facility. Verify that pesticides are mixed and/or stored only in facilities where due regard has been given to the hazardous nature of pesticide, site selection, protective enclosures and operating procedures. Verify that pesticides stored in unit level, field sanitation team kits are stored with due regard given to their hazardous nature. (NOTE: It is important to verify that Calcium Hypochlorite is not stored in the same chest, box, or shipping container, or close proximity to any pesticide product.) Verify that storage is in a dry, well-ventilated, separate room, building, or covered area where fire protection is provided. Verify that the storage area is protected from freezing temperatures and direct sunlight. Verify that rigid containers are stored in an upright position. Verify that all containers are stored off the ground with labels plainly visible to permit ready access and inspections. Verify that herbicides and insecticides are stored separately with sufficiently safe segregation, with the use of 4 ft [1.2 m] aisles, in order to avoid cross-contamination or adverse reactions. Verify that floor drains are not present.

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PM.45.4.A. (continued)	Verify that stored pesticides are inspected monthly to determine the condition of the containers.
PM.45.5.A. Movable equipment used for handling pesticides must be labeled and handled according to specific requirements (AR 420-76, para 4-1b(3)).	Verify that mobile equipment used for pesticide applications that might be used for other purposes is labeled CONTAMINATED WITH PESTICIDES. Verify that mobile equipment is not removed unless thoroughly decontaminated.
PM.45.6.A. Pre-fire plans for pesticide storage areas are required to be updated annually (AR 420-76, para 4-1f).	Verify that the pesticide management coordinator has a pre-fire plan and that it is updated annually.
PM.45.7.A. Pesticides in deteriorated or leaking containers will be recontainerized or overpacked in approved containers (AR 240-76, para 4-2c).	Verify that leaking pesticide containers are recontainerized or overpacked to prevent further leakage.
PM.45.8.A. A pesticide spill cleanup kit must be strategically located where pesticides are stored and mixed (AR 420-76, para 4-1e(1)).	Verify that a pesticide spill cleanup kit is available to clean up and detoxify spills in the pesticide storage facility, transportation equipment, and mixing areas.
PM.45.9.A. Sites where pesticides are stored or mixed must meet specific requirements (AR 420-76, para 4-1b(1)).	Verify that the site location, where possible, is in an area where flooding is unlikely and where hydrogeologic conditions prevents contamination of any water system by runoff or percolation by: - inspecting area surrounding facilities and determine proximity to surface water - noting location relative to floodplains, depth of groundwater, and general soil types and typical permeability. Verify that, when needed, drainage from the site is contained by natural or artificial barriers or dikes.

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PM.45.9.A. (continued)	(NOTE: These requirements only apply to pesticides or excess pesticides classed as highly toxic or moderately toxic and are labeled DANGER, POISON, WARNING, or with the skull and crossbones symbol.) (NOTE: These requirements are based on recommendations found in 40 CFR 165.10(b).)
PM.45.10.A. Storage or mixing facilities for pesticides must meet specific structural requirements (AR 420-76, para 4-1b(1)).	Verify that storage is in a dry, well-ventilated, separate room, building, or covered area where fire protection is provided. Verify that the entire storage facility is secured by a climb-proof fence and doors and gates are kept locked to prevent unauthorized entry. (NOTE: These requirements are based on recommendation found in 40 CFR 165.10(c)(1).) (NOTE: These requirements only apply to pesticides or excess pesticides classed as highly toxic or moderately toxic and are labeled DANGER, POISON, WARNING, or with the skull and crossbones symbol.)
PM.45.11.A. The storage of pesticides must meet specific operational requirements (AR 420-76, para 4-1b(1)).	(NOTE: These requirements only apply to pesticides or excess pesticides classed as highly toxic or moderately toxic and are labeled DANGER, POISON, WARNING, or with the skull and crossbones symbol.) Verify that: - pesticide containers are stored with the label plainly visible - all containers are in good condition - the lids and bungs on metal or rigid plastic containers are tight - the pesticides are segregated and stored under a sign containing the name of the formulation - rigid containers are stored upright and all containers are stored off the ground. Verify that a complete inventory is kept indicating the number and identity of containers in a storage unit. Verify that containers are inspected regularly for corrosion and leaks and that absorbent material is available for spill cleanup. Verify that excess pesticides and their containers are segregated according to the method of disposal. (NOTE: These requirements are based on recommendations found in 40 CFR 165.10(d).)

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PM.45.12.A. Decontamination facilities are required for personnel at installations which use pesticides (AR 420-76, para 4-1b(1)).	Verify that facilities such as safety shower and eye lavage are available for personnel decontamination. (NOTE: These requirements are based on recommendations found in 40 CFR 165.10(c)(4).) (NOTE: These requirements only apply to pesticides or excess pesticides classed as highly toxic or moderately toxic and are labeled DANGER, POISON, WARNING, or with the skull and crossbones symbol.)
PM.45.13.A. Decontamination facilities are required for equipment at sites where pesticides are used (AR 420-76, para 4-1b(1)).	Verify that facilities are available for the decontamination of equipment, including vehicles which have been used for pesticide applications. Verify that berms, curbing, impervious surfaces, and catchment drains which are used to impound washwater resulting from decontamination prevent spillage of washwater. Verify that drains impound washwater and do not connect to sanitary sewer or stormwater systems unless permitted to do so under a National Pollutant Discharge Elimination System (NPDES) permit. Verify that the procedure for disposal of washwater resulting from decontamination activities is the same as for excess pesticides. (NOTE: These requirements are based on recommendations found in 40 CFR 165.10(c)(4).) (NOTE: These requirements only apply to pesticides or excess pesticides classed as highly toxic or moderately toxic and are labeled DANGER, POISON, WARNING, or with the skull and crossbones symbol.)
PM.45.14.A. Outdoor sites/facilities used to mix pesticides are required to meet specific parameters (AR 420-76, para 4-1b(1)).	(NOTE: These requirements only apply to pesticides or excess pesticides classed as highly toxic or moderately toxic and are labeled DANGER, POISON, WARNING, or with the skull and crossbones symbol.) Verify that berms, curbing, and impervious surfaces are present to contain liquids resulting from accidental spills during mixing operations. Verify that drains do not connect to sanitary sewer or stormwater systems unless permitted to do so under a NPDES permit. Verify that personnel decontamination facilities are available at or near the site.

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PM.45.15.A. Outdoor mixing sites should meet specific requirements (MP). PM.45.16.A. Facilities where pesticides are stored, used, or mixed are required to follow specific practices and procedures to ensure safety (AR 420-76, para 4-1b(1)).	Verify that the outdoor mixing site has a wind screen. Verify that the outdoor mixing site has a frost free elevated water fill pipe. Verify that no food consumption, drinking, smoking, or tobacco use is undertaken in any area where pesticides are present. Verify the following practices are performed in pest management operations: - persons handling pesticides keep hands away from mouths and eyes and wear rubber gloves during all pesticide handling - persons handling pesticides wash hands immediately upon completion of working with pesticides and always prior to eating, smoking or using toilet facilities - persons handling concentrated pesticides wear protective clothing which is removed if found to be contaminated - persons working regularly with organophosphates and N-alkyl carbamate pesticides have periodic physical examinations, including cholinesterase tests - a stock of protective clothing is available - inspect all containers for leakage prior to handling - do not store pesticides in the vicinity of human or animal food or for preparation areas - do not permit unauthorized persons in the storage area. (NOTE: These requirements only apply to pesticides or excess pesticides classed as highly toxic or moderately toxic and are labeled DANGER, POISON, WARNING, or with the skull and crossbones symbol.) (NOTE: These requirements are based on recommendations found in 40 CFR 165.10(e) and 165.10(f).)
PM.45.17.A. Pesticide storage or mixing facilities and equipment which contain or use pesticides are required to have signs and safety procedures posted (AR 420-76, para 4-1b(1)).	Verify that signs which read DANGER, POISON, PESTICIDE STORAGE are posted on or near entries to storage facilities. Verify that safety precautions and accident prevention measures are posted. Verify that an inventory of pesticides is displayed outside of the storage facility identifying all chemicals in storage. Verify that mobile equipment used for pesticide applications is labeled CONTAMINATED WITH PESTICIDES. (NOTE: These requirements are based on recommendations found in 40 CFR 165.10(c)(2) through 165.10(c)(3), 165.10(e), and 165.10(g)(2).)

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PM.45.17.A. (continued) PM.45.18.A. Where large quantities of pesticides are being stored, or other conditions warrant, the local fire department, hospitals, public health officials, and police department must be notified in writing that pesticides are being stored in the event of a fire (AR 420-76, para 4-1b(1)). PM.45.19.A. Certain precautions are to be taken in the event of a fire at a pesticide storage or mixing areas (AR 420-76, para 4-1b(1)).	(NOTE: These requirements only apply to pesticides or excess pesticides classed as highly toxic or moderately toxic and are labeled DANGER, POISON, WARNING, or with the skull and crossbones symbol.) Verify that notification has been submitted and includes a statement of the hazards that pesticides may present during a fire. Verify that a floor plan of the storage facility indicating the location of the different pesticide classifications has been submitted to the fire department. Verify that the fire chief has the home telephone numbers of the person(s) responsible for the pesticide storage facility. (NOTE: These requirements are based on recommendations found in 40 CFR 165.10(g)(1).) (NOTE: These requirements only apply to pesticides or excess pesticides classed as highly toxic or moderately toxic and are labeled DANGER, POISON, WARNING, or with the skull and crossbones symbol.) Verify that the following procedures are practiced by interviewing the Fire Chief: - firefighting personnel wear supplied air suits and rubberized clothing - personnel avoids breathing or otherwise contacting toxic smoke and fumes - personnel washes completely as soon as possible after encountering smoke and fumes - the water used in fire fighting is contained within the storage site drainage system - individuals who might be threatened by the fumes/smoke are evacuated - firemen take cholinesterase tests after fighting fires involving organophosphate or N-alkyl carbamate pesticides. (NOTE: These requirements are based on recommendations found in 40 CFR 165.10(g)(3).) (NOTE: These requirements only apply to pesticides or excess pesticides classed as highly toxic or moderately toxic and are labeled DANGER, POISON, WARNING, or with the skull and crossbones symbol.)

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PM.55 DISPOSAL PM.55.1.A. Disposal must be initiated for all excess pesticides and strict turn-in procedures followed (DODD 4160.21 M, para VI(B)(77) and AR 420-76, para 4-2b). PM.55.2.A. Facilities are required to dispose of any pesticide, pesticide container, or pesticide residue according to specific restrictions (AR 420-76, para 4-2a(2) and 4-2a(3)). PM.55.3.A. Excess spray and rinsewater must be disposed in a manner that does not constitute open dumping (AR 420-76, para 4-2d(1) and 40-5, para 10-5c).	Verify that reports have been made to: - MACOM/AEC PMC - USACHPPM Pesticide Hotline. (NOTE: The best method for disposal of excess pesticides, if not restricted by a suspension or cancellation notice by USEPA, is to use them in accordance with label directions.) Verify that paperwork to turn in excess serviceable pesticides that cannot be used and unserviceable pesticides has been submitted to the installation DRMO and it is ensured that DRMO has proper storage facilities with adequate space. (NOTE: Pesticides awaiting disposal must be stored in accordance with 40 CFR 165.10. Therefore, DRMO may or may not take physical custody of the pesticides.) Verify that pesticides, pesticide containers, and/or pesticide residues are disposed of so that: - it is not inconsistent with labeling - open dumping of pesticides or pesticide containers is not done - open burning is not done except when allowed by state and local regulation - food or feed contamination does not occur - water dumping or ocean dumping does not occur. Verify that pesticides or pesticide-related waste generated by the civilian community are not turned in at the installation. (NOTE: These requirements are based on recommendations found in 40 CFR 165.7.) Verify that the following procedures are in effect to limit excess finished spray: - proper calculation - mixing only the amount of chemical required for each job. Verify that excess finished spray is not disposed of in the sanitary sewer but is disposed of using one of the following methods: - used in accordance with label directions - disposed of as a pesticide related waste.

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PM.55.3.A. (continued)	Verify that container and equipment rinsewater is handled in one of the following ways: - saved for use as diluent in a subsequent spray operation - disposed of as a pesticide related waste. Verify that leftover pesticide solutions from animal dipping operations at the veterinarians are disposed of in an approved manner. (NOTE: These requirements are based in recommendations found in 40 CFR 165.8 and 165.9.)
PM.55.4.A. Empty pesticide containers must be disposed in a manner that does not constitute open dumping (AR 420-76, para 4-2d).	Verify through interviewing personnel managing pesticides, that empty pesticide containers are: - drained for 1 min into the spray or mix tank - triple rinsed - rendered unusable (crushed and punctured) - disposed of in an approved landfill - recycled in accordance with label instructions or approved recycling plan. Determine which of the following types of containers the installation has onsite: - Group I Containers: combustible containers which formerly contained organic or metallo-organic pesticides - Group II Containers: noncombustible containers which formerly held organic or metallo-organic pesticides - Group III Containers: containers (both combustible and noncombustible) which formerly held organic mercury, lead, cadmium, or arsenic, or inorganic pesticides. Verify that Group I Containers are disposed of in a pesticide incinerator or buried in a specially designated landfill. Verify that Group II Containers are triple-rinsed and containers not in good condition punctured prior to transport to a recycling facility or disposal. Verify that Group III Containers are triple rinsed and punctured prior to disposal in a sanitary landfill. (NOTE: These requirements are based on recommendations found in 40 CFR 165.8 and 165.9.)

Appendix 7-1

Requirements for Installation Pest Management Program

Pest Control Recognized Requirements Manhours*	Minimum No. of Certified Full-Time Pesticide Applicators Required	Installation Pest Management Plan (IPMP)	Onsite Program Review
Less than 0.25	None unless restricted-use pesticides are used or unusually sensitive environmental conditions exist, including endangered species	Individual plan not required; included in supporting installation plan	Requirements established by MACOM PMC
0.25 to 0.49	One	Same as above	Same as above
0.50 to 1.49	One	Individual pest management plans required	Annual or biennial
1.50 to 3.99	Two	Same as above	Same as above
4.00 or more	50 percent of the pest management workforce	Same as above	Same as above

* Multiply the total productive man-years required for the pest management program by a factor of 1.19 to determine the recognized requirement. This factor includes essential time allowance for annual and sick leave, on-the-job training, formal training, mandatory attendance at lectures on safety, security, and fire prevention, and required medical examination.

Section 8

Petroleum, Oil, and Lubricant (POL) Management (Active Army Supplement)

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SECTION 8

PETROLEUM, OIL, AND LUBRICANT (POL) MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

- AR 200-1, *Environmental Protection and Enhancement*. Chapter 8 of AR 200-1, dated 23 May 1990, addresses the Oil and Hazardous Substances Pollution Contingency (OHSPC) Plan. It prescribes the policy and procedure for prevention and control of spills of oil and hazardous substances, and sets out guidance in accordance with regulations implemented by the *Clean Water Act* (CWA).

B. Department of Defense (DOD) Directives and Instructions

- DOD Directive (DODD) 5030.41, *Oil and Hazardous Substances Pollution Prevention and Contingency Program*. This directive, dated 26 September 1978, addresses requirements for compliance with the National OHSPC Plan.

C. Using the TEAM Guide for ECAS

- No additional instructions.

D. Key Army/DOD Compliance Requirements

- Spill Prevention, Control, and Countermeasures (SPCC) Plan - Installations which fall under the following limits are required to develop a SPCC Plan:
 1. has the potential to spill oil or hazardous substance in a quantity that would be harmful to human health or welfare or to the environment
 2. meets at least one of the following criteria:
 - a. aggregate aboveground oil storage on the installation is greater than 5003 L (1320 gal)
 - b. any single aboveground oil storage tank on the installation exceed 2501 L (660 gal)
 - c. total underground oil storage on the installation is greater than 159,180 L (42,000 gal)
 3. one or more hazardous substance is stored in quantities that would be harmful to human health or welfare, or to the environment if a spill were to occur.

Army installations are required to review the SPCC Plan every 2 yr or when there is a change in facility design, construction, operation, or maintenance that affects the potential for spills of oils or hazardous substances (AR 200-1, para 8-4).

- Spills - Any spill of petroleum products must be reported to the Installation On-Scene Coordinator (IOSC) immediately (AR 200-1, para 8-3(a)).

E. Key Compliance Personnel

- The Directorate of Public Works (DPW) is responsible for monitoring wastewater discharge and stream water quality at selected locations around the installation. This responsibility may also fall to the Directorate of Environmental Quality (DEQ).

- The Spill Response Team (SRT) is tasked to respond to spills when requested by an On-Scene Coordinator (OSC) and to perform spill containment, recovery, cleanup, disposal and restoration activities as directed by the OSC. The SRT is a multidisciplinary team often including the following persons: Facilities Engineer, Environmental Coordinator, Director of Safety and Health, Fire Chief, Military Police, Public Affairs Officer (PAO), Safety Officer, and Staff Judge Advocate.
- The Fire Department provides support in emergency response, spill events, exercises, and fire protection activities. In addition, the department will be responsible to make periodic fire safety inspections of flammable/combustible storage and handling areas, hazardous waste storage areas, and accumulation points on the installation.
- The Safety Officer is responsible for conducting workplace safety evaluations and inspections of the handling and storage of hazardous materials and waste. The Safety Officer will provide the appropriate manager with a report of their findings and recommended corrective actions. The Safety Officer is also responsible for ensuring the prompt and accurate investigation of any hazardous material mishaps that result in injury or property damage.
- Fuels Management Officer of DPW is responsible for the safe and efficient receipt, storage, handling, issuing, and accounting of all petroleum products to include all general operations and inspections.
- DPW is responsible for the maintenance of all installed petroleum storage and dispensing systems. This responsibility often is discharged by the Liquid Fuels Maintenance (LFM) shop. The DPW also is responsible for the calibration of permanently installed meters.

F. Key Army/DOD Compliance Definitions

- None

G. Records To Inspect in Addition To Those Listed in TEAM Guide

- Oil transfer manual

H. Physical Features To Examine in Addition To Those Listed in TEAM Guide

- Oil storage at Army/Air Force Exchange Service (AAFES) operations

I. People To Interview

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Fire Department
- Director of Logistics (DOL)
- Chief of Operations and Maintenance (O&M)
- Maintenance Officers (Company, Battalion, Brigade Site Units)
- Fuels Management Officer (DOL/DPW)
- Building and Grounds Division (DPW)

- TSDF Operators (DPW, DOL, DRMO)
- Safety
- Spill Response Team
- DRMO Personnel

J. Guidance for Active Army POL Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBERS:
All Installations	PO.1.1.A and PO.1.2.A	8-7
Spill Plans	PO.5.1.A through PO.5.6.A	8-9
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POL Storage General	PO.20.1.A	8-15
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Used Oil	PO.60.1.A	8-19

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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PO.1 ALL INSTALLATIONS PO.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on POL, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). PO.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).	Verify current copies of the following, which are applicable, are maintained at the installation: - 40 CFR 110, <i>Discharge of Oil</i>. - 40 CFR 112, <i>Oil Pollution Prevention</i>. - EO 12088, <i>Federal Compliance with Pollution Standards</i>. - DOD Directive 5030.41, <i>Oil and Hazardous Substances Pollution Prevention and Contingency Program</i>. - AR 200-1, <i>Environmental Protection and Enhancement</i>. - applicable state and local regulations. Determine if current state/local POL management regulations are maintained and followed at the installation. Determine what management systems are in place. Verify that the existing system addresses the issues associated with POL management by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented.

COMPLIANCE CATEGORY: POL MANAGEMENT U.S. TEAM Guide: Active Army Supplement	
REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PO.5 SPILL PLANS PO.5.1.A. The DOD requires SPCC Plans to be developed for a broader range of activities than the Code of Federal Regulations (DOD Directive 5030.41, para D; AR 200-1, para 8-4a). PO.5.2.A. Army installations are required to review the SPCC Plan every 2 yr or when there is a change in facility design, construction, operation, or maintenance that affects the potential for spills of oils or hazardous substances (AR 200-1, para 8-4c(4)).	Verify that a SPCC Plan has been developed for each installation or activity, including government-owned contractor-operated (GOCO) facilities, which has discharged or could reasonable discharge oil in harmful quantities into or upon the waters of the United States or its shorelines. Verify that a SPCC Plan has been developed if the installation: - has the potential to spill oil or hazardous substance in a quantity that would be harmful to human health or welfare or to the environment - meets at least one of the following criteria: - aggregate aboveground oil storage on the installation is greater than 5003 L (1320 gal) - any single aboveground oil storage tank on the installation exceed 2501 L (660 gal) - total underground oil storage on the installation is greater than 159,180 L (42,000 gal) - storage of one or more hazardous substances in quantities that would be harmful to human health or welfare, or to the environment if a spill were to occur. Verify that the SPCC Plan is reviewed every 2 yr.

**COMPLIANCE CATEGORY:
POL MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PO.5.3.A. The installation must have a spill contingency plan (ISCP) that addresses specific issues (AR 200-1, para 8-5a through 8-5c).	Verify that the ISCP contains the following: - provisions specifying the responsibilities, duties, procedures and resources to be used to contain and cleanup spills - a description of immediate response actions that should be taken when a spill is discovered - identification of resources for possible use - the name, responsibilities, and duties of the IOSC - the specifications, composition and training of the IRT - procedures for IRT alert and mobilization - a current list of persons and alternates who are on call to receive notice of an oil or hazardous substance spill - surveillance procedures for early detection of discharges - quantities and locations of personnel equipment, vehicles, supplies, and material resources - additional resources available for spill cleanup - procedures and techniques used to identify, contain, disperse, reclaim, and remove oil and hazardous substances used in bulk quantity on the installation - procedures for reporting by telephone and in writing - a description of safety precautions for known hazardous substances on the installation - a public affairs appendix that describes the procedures, responsibilities, and methods for releasing information in the event of a spill. Verify that copies of the ISCP are kept on file at the DPW, the emergency operations center, Preventive Medicine, the safety office, the security office, the PAO, and each site that stores, handles, or transfers oil or hazardous substances for which there is a reasonable possibility of a significant spill. (NOTE: The ISCP may be combined with the SPCC.)
PO.5.4.A. The ISCP is required to be updated every 3 yr and approved by a professional engineer (AR 200-1, para 8-5d(1)).	Verify that the ISCP portion of any spill response documentation is updated every 3 yr. Verify that the ISCP has been approved by a professional engineer.
PO.5.5.A. An IOSC and an IRT must be appointed by the IC (AR 200-1, para 1-25(i)(13)).	Verify that IOSC and IRT have been appointed. Verify that they are trained and knowledgeable of the contingency plan.

COMPLIANCE CATEGORY: POL MANAGEMENT U.S. TEAM Guide: Active Army Supplement	
REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PO.5.6.A. Yearly training is required to test the effectiveness of ISCP personnel and equipment (AR 200-1, para 5-4d(2)).	Verify that yearly training is being done.

COMPLIANCE CATEGORY:
POL MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

**REGULATORY
REQUIREMENTS:**

REVIEWER CHECKS:
May 1995

**PO.15
DISCHARGES/SPILLS**

PO.15.1.A. Any spill of petroleum products must be reported to the IOSC immediately (AR 200-1, para 8-3(a)).

Verify that spills of petroleum products have been reported to the IOSC.

**COMPLIANCE CATEGORY:
POL MANAGEMENT
U.S. TEAM Guide: Active Army Supplement**

**REGULATORY
REQUIREMENTS:**

**REVIEWER CHECKS:
May 1995**

POL STORAGE

**PO.20
General**

PO.20.1.A. The DPW Utilities Maintenance and Operations and DOL Fuel Maintenance should have a Memorandum of Agreement (MOA) pertaining to draining of floating roof tanks and interior dike basins (MP).

Determine if a MOA has been prepared and signed or coordinated through the DPW Director and the Environmental Coordinator (EC).

COMPLIANCE CATEGORY:
POL MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PO.40 PIPELINES PO.40.1.A. Army operated offsite pipelines should be inspected regularly (MP).	Determine if inspections are performed. Verify that detected leaks and failures have been reported and leaking pipes repaired or replaced.

COMPLIANCE CATEGORY:
POL MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

**REGULATORY
REQUIREMENTS:**

REVIEWER CHECKS:
May 1995

**PO.60
USED OIL**

PO.60.1.A. Installations should have a process for the management of reclaimed, recoverable, and waste liquid petroleum products (MP).

Verify that the installation has identified sources of reclaimed, recovered, and waste liquid petroleum products and are managing these products appropriately.

Section 9

Solid Waste Management (Active Army Supplement)

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SECTION 9

SOLID WASTE MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

- AR 40-5, *Preventive Medicine*. This AR, dated 15 October 1990, establishes practical measures for the preservation and promotion of health and the prevention of disease and injury. The Department of the Army (DA) objective is to manage Army solid waste to ensure compliance with appropriate Federal, state, and DA regulations in a manner that permits maximum opportunity for resource recovery without jeopardizing natural resources or health and the environment.
- AR 200-1, *Environmental Protection and Enhancement*. Chapter 6, *Solid Waste and Hazardous Waste Management Program*, dated 23 May 1990, defines Army policy and responsibility for managing solid waste, including resource recovery, recycling, waste reduction, and training programs. It mandates compliance with local, state, and Federal solid waste requirements, to assure waste management practices the protection of human health and the environment, to reduce the need for corrective action, and minimize waste generation and disposal.
- AR 215-2, *Administration of Morale, Welfare and Recreation (MWR) Activities and Nonappropriated Funds Instrumentalities (MAFIs)*. This AR, dated 10 October 1990, contains guidance for the involvement of MAFI activities in the recycling program.
- AR 420-47, *Solid and Hazardous Waste Management*. This AR, dated 1 January 1985, remains in force with the exception of Chapters 5 and 6, Appendices A, B, and C, and the glossary, which have been superseded by AR 200-1. The remaining chapters cover responsibilities regarding solid and hazardous waste, collection and storage of both solid and hazardous waste, thermal processing and land disposal of solid (nonhazardous) waste, and monitoring records.

B. Department of Defense (DOD) Directives and Instructions

- DOD Directive (DODD) 4165.60, *Solid Waste Collection, Disposal, Material Recovery, and Recycling*. This directive, dated 4 October 1976, provides guidance and direction to all DOD facilities relative to solid waste collection, disposal, material recovery, and recycling in agreement with the *Solid Waste Disposal Act* (SWDA).

C. Using the TEAM Guide for ECAS

- No additional instructions.

D. Key Army/DOD Compliance Requirements

- Recycling - Army installations are required to participate in any state or local recycling programs and to reduce the volume of solid waste materials at the source whenever practical (DOD 4165.60, para V(a), V(c), and V(h), and AR 200-1, para 6-14a).

- Solid Waste Storage - All solid waste is required to be stored such that:
 1. it is not a fire, health, or safety hazard
 2. it does not provide food or harborage for disease vectors
 3. it is contained or bundled to prevent spills.

Additionally, food waste containers are required to be marked UNAUTHORIZED PERSONNEL ARE NOT TO ENTER DUMPSTER FOR ANY REASON (AR 420-47, para 3-4b).

E. Key Compliance Personnel

- The Directorate of Public Works (DPW) is responsible for site location, licensing, construction, and operation of onsite landfills, and for the storage and transportation of solid wastes to either onsite or offsite disposal activities operated by the installation.
- The Installation Commander (IC) designates an activity (normally either DPW or an MWR activity) as the qualifying waste recycling program (QWRP) manager. The QWRP manager is responsible for proper operation of the program.

F. Key Army/DOD Compliance Definitions

- None.

G. Records To Review in Addition To Those Listed in TEAM Guide

- Installation solid waste management plans, Standard Operating Procedures (SOPs)

H. Physical Features To Inspect in Addition To Those Listed in TEAM Guide

- Waste receptacles (dining facilities, hospitals, labs, motor pools, industrial areas)
- Defense Reutilization and Marketing Office (DRMO) facilities

I. People To Interview

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Preventive Medicine Officer
- Chief of Operations and Maintenance (O&M)
- Director of Contracting (DOC)
- Public Affairs Office (PAO)
- Chief of Directorate of Personnel and Community Activities (DPCA)
- Defense and Reutilization Marketing Office (DRMO)
- Morale, Welfare, and Recreation (MWR)
- Disposal Facility Operator
- Recycling Coordinator

J. Guidance for Active Army Solid Waste Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBERS:
All Installations	SO.1.1.A and SO.1.2.A	9-5
Storage/Collection of Solid Waste	SO.10.1.A through SO.10.5.A	9-7
Recycling	SO.25.1.A	9-9



**COMPLIANCE CATEGORY:
SOLID WASTE MANAGEMENT
U.S. TEAM Guide: Active Army Supplement**

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
SO.1 ALL INSTALLATIONS SO.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on solid waste, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). SO.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters, etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).	Determine if copies of the following regulations, which are applicable, are current and available at the installation: - 7 CFR 330, <i>Animal and Plant Health Inspection Service.</i> - 40 CFR 240, <i>Guidelines for Thermal Processing of Solid Waste.</i> - 40 CFR 241, <i>Guidelines for Land Disposal of Solid Wastes.</i> - 40 CFR 243, <i>Guidelines for the Storage and Collection of Residential, Commercial, and Institutional Solid Waste.</i> - 40 CFR 245, <i>Promulgation Resource Recovery Facility Guidelines.</i> - 40 CFR 246, <i>Source Separation for Materials Recovery Guidelines.</i> - 40 CFR 258, <i>Criteria for Municipal Solid Waste Landfills.</i> - EO 12088, <i>Federal Compliance with Pollution Standards.</i> - DODD 4165.60, <i>Solid Waste Collection, Disposal, Material Recovery, and Recycling.</i> - AR 40-5, <i>Preventive Medicine.</i> - AR 200-1, <i>Environmental Protection and Enhancement.</i> - AR 420-47, <i>Solid and Hazardous Waste Management.</i> - TN 420-47-02 - applicable state and local regulations. (NOTE: A consolidated listing of approved test methods should also be maintained at the installation such as <i>Test Methods for Evaluating Solid Waste, Physical/Chemical Methods</i>, USEPA Publication SW-846, Document #PB87-120-291.) Determine what management systems are in place. Verify that the existing system addresses the issues associated with solid waste by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented.

**COMPLIANCE CATEGORY:
SOLID WASTE MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
SO.10 STORAGE/ COLLECTION OF SOLID WASTE SO.10.1.A. Army installations are required to follow specific requirements for solid waste storage, collection, and cleaning of equipment (AR 200-1, para 6-12b and 420-47, para 3-4a). SO.10.2.A. Installation industrial shop waste receptacles should be inspected quarterly to verify that hazardous wastes are not being deposited (MP). SO.10.3.A. Installation personnel should be periodically informed about materials that are prohibited from disposal in solid waste receptacles (MP). SO.10.4.A. Food waste containers are required to be marked UNAUTHORIZED PERSONNEL ARE NOT TO ENTER DUMPSTER FOR ANY REASON (AR 420-47, para 3-4b(5)).	Verify that all solid waste is stored such that: - it is not a fire, health, or safety hazard - it does not provide food or harborage for disease vectors - it is contained or bundled to prevent spills. Verify that containers are properly cleaned. Verify that receptacles were inspected by interviewing staff and reviewing records. Verify that corrective actions were taken where indicated. Inspect a sample of solid waste receptacles at shops for presence of hazardous waste. Verify that a program exists at the installation to keep personnel informed about proper waste disposal practices. Verify that dumpsters used for food products are correctly labeled.

**COMPLIANCE CATEGORY:
SOLID WASTE MANAGEMENT
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**REGULATORY
REQUIREMENTS:**

SO.10.5.A. Weekly collection is required for garbage from dining facilities and similar activities and family quarters (AR 420-47, para 3-7).

**REVIEWER CHECKS:
May 1995**

Verify that weekly collection is occurring.

**COMPLIANCE CATEGORY:
SOLID WASTE MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
SO.25 RECYCLING SO.25.1.A. Army installations are required to participate in any state or local recycling programs and to reduce the volume of solid waste materials at the source whenever practical (DOD 4165.60, para V(a), V(c), and V(h), and AR 200-1, para 6-14a).	Determine if a solid waste reduction/resource recovery program exists. Verify that recycling program is in compliance with applicable state or local requirements. Verify that reusable or marketable materials are collected at regular intervals. Verify that proceeds from the sale of recyclables are properly distributed.

Section 10

Storage Tank Management (Active Army Supplement)

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I. People To Interview	2
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SECTION 10

STORAGE TANK MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

- AR 200-1, *Environmental Protection and Enhancement*. This AR, dated 23 May 1990, requires compliance with the most stringent Federal, state, local, host nation, and Army requirements for underground storage tanks (USTs) and aboveground storage tanks (ASTs). It further lifts the categorical exclusion granted to heating oil USTs under Subtitle I of the *Resource Conservation and Recovery Act* (RCRA). Chapter 5, paragraph 7, outlines the basic Army UST requirements to follow in the absence of more stringent regulations.

B. Department of Defense (DOD) Directives and Instructions

- All applicable directives and instructions have previously been implemented by ARs.

C. Using the TEAM Guide for ECAS

The following forms are used by the Army to document compliance as required in 40 CFR 280.43(a) (TEAM Guide checklist item ST.65.1):

- DA Form 3853-1, *Innage Gauge Sheet*.
- DA Form 5831-R, *Petroleum Product Inventory Control Sheet*.
- DA Form 3643, *Daily Issues of Petroleum Products*.
- DA Form 3644, *Monthly Abstract of Issues of Petroleum Products and Operating Supplies*.
- DA Form 4702-R, *Monthly Bulk Petroleum Accounting Summary*.

D. Key Army/DOD Compliance Requirements

- Heating Oil USTs - USTs used for storing heating oil for consumptive use on the premises where stored must comply with 40 CFR 280 (AR 200-1, para 5-7).
- New and Replacement USTs - All new and replacement USTs are required to be of doublewall construction with interstitial monitoring.
- Hazardous Waste USTs - USTs will not be used for the storage of hazardous waste (AR 200-1, para 5-7c(3)).
- Abandoned and Out-of-Service USTs - USTs that are permanently taken out of service and abandoned USTs are required to be removed from the ground (AR 200-1, para 5-7c(4)).

E. Key Compliance Personnel

- The Safety Officer is responsible for conducting work place safety evaluations and inspections of the handling and storage of hazardous materials and waste. The Safety Officer will provide the ap-

appropriate manager with a report of the findings and recommended corrective actions. The Safety Officer is also responsible for ensuring the prompt and accurate investigation of any hazardous material mishaps that result in injury or property damage.

- The Fuels Management Officer of the DPW is responsible for the safe and efficient receipt, storage, handling, issuing, and accounting of all petroleum products to include all general operations and inspections.
- The DPW is responsible for the maintenance of all installed petroleum storage and dispensing systems. This responsibility often is discharged by the Liquid Fuels Maintenance (LFM) shop. The DPW also is responsible for the calibration of permanently installed meters.
- The EC monitors all POL activities that may affect the environment and usually is responsible for the coordination of the review and updates of the ISCP Plan. The EC also often coordinates the reportable spills notification of appropriate Federal and state agencies on behalf of the Installation On-Scene Commander (IOSC).

F. Key Army/DOD Compliance Definitions

- Although the USEPA excludes tanks used for storing heating oil for consumptive use on the premises where stored, the U.S. Army does not (AR 200-1).

G. Records To Review in Addition to Those Listed in TEAM Guide

- UST replacement program
- UST Management Plan

H. Physical Features To Inspect in Addition to Those Listed in TEAM Guide

- Rapid Refueling Points
- Fuel Bladders
- Heating oil USTs

I. People To Interview

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Safety and Health Officer
- Fire Department
- Director of Logistics (DOL)
- Chief of Operations and Maintenance (O&M)
- Spill Response Team (SRT)
- Fuels Management Officer

J. Guidance for Active Army Storage Tank Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBERS:
All Installations	ST.1.1.A and ST.1.2.A	10-5
Aboveground Storage Tanks (ASTs)	ST.5.1.A through ST.5.4.A	10-7
Underground Storage Tanks (USTs)	ST.30.1.A through ST.30.3.A	10-9
Changes in Service or Closure of USTs	ST.95.1.A and ST.95.2.A	10-11

**COMPLIANCE CATEGORY:
STORAGE TANK MANAGEMENT
U.S. TEAM Guide: Active Army Supplement**

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
ST.1 ALL INSTALLATIONS ST.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on storage tank management, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). ST.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).	Verify current copies of the following, which are applicable, are maintained at the installation: - 40 CFR 112, <i>Oil Pollution Prevention</i>. - 40 CFR 280, <i>Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (USTs)</i>. - EO 12088, <i>Federal Compliance with Pollution Standards</i>. - AR 200-1, <i>Environmental Protection and Enhancement</i>. - TM 5-675, <i>Repairs and Utilities: Solid Fuel Operations</i>. - TM 5-678, <i>Petroleum, Oil, and Lubricants (POLs)</i>. - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with storage tanks by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented.

COMPLIANCE CATEGORY:
STORAGE TANK MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
ST.5 ABOVEGROUND STORAGE TANKS (ASTs) ST.5.1.A. A product recovery system should be installed at the tank water drain-off valve for tanks storing aviation fuels (MP). ST.5.2.A. The DPW Utilities Maintenance and Operations and DOL Fuel Maintenance should have a Memorandum of Agreement (MOA) pertaining to draining of floating roof tanks and interior dike basins (MP). ST.5.3.A. Wastewater and fuel sludges resulting from periodic tank cleaning should not be discharged to surface waters, sewers, or to the ground (MP). ST.5.4.A. Periodic inspection of MOGAS, diesel, kerosene, and aviation fuel test cell storage tanks should be done (MP).	Verify that product recovery systems are in place and operating correctly on aviation fuel tanks. (NOTE: Federal regulations do not require product recovery system for ground-use petroleum products; however, state and local regulations may require such systems.) Determine if a MOA has been prepared and signed or coordinated through the DPW Director and the EC. Determine if residues from tank cleaning operations are properly disposed of, including testing for hazardous characteristics as needed. Determine if inspections have been conducted as required. Verify that leaking or deteriorated tanks have been repaired or replaced. Verify that leaks were reported to the DPW Director, EC, and Safety Officer.

COMPLIANCE CATEGORY:
STORAGE TANK MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
ST.30 UNDERGROUND STORAGE TANKS (USTs) ST.30.1.A. USTs used for storing heating oil for consumptive use on the premises where stored are required to meet the requirements in 40 CFR 280 (AR 200-1, para 5-7). ST.30.2.A. All new and replacement USTs are required to meet specific requirements (AR 200-1, para 5-7c(1) and 5-7c(2)). ST.30.3.A. USTs will not be used for the storage of hazardous waste (AR 200-1, para 5-7c(3)).	Determine if the installation has USTs used for storing heating oil for consumptive use on the premises where stored. Verify that these USTS meet the requirements outlined in 40 CFR 280 as outlined in the TEAM Guide. Verify that all new and replacement USTS are of doublewall construction with interstitial monitoring. Verify that no UST on the installation is used to store hazardous waste.

**COMPLIANCE CATEGORY:
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
ST.95 CHANGES IN SERVICE OR CLOSURE ST.95.1.A. USTs that are permanently taken out of service and abandoned USTs are required to be removed from the ground (AR 200-1, para 5-7c(4)). ST.95.2.A. USTs that are leaking must be emptied and taken out of service (AR 200-1, para 5-7e).	Determine if the installations has any USTs that are permanently taken out of service or abandoned. Verify that these USTs are removed from the ground. (NOTE: Nonleaking USTs do not have to be removed from the ground if the installation has received an exemption from HQDA or the MACOM.) Determine if the installation has identified any leaking USTs. Verify that leaking USTs are emptied, taken out of service, and removed from the ground.

Section 11

Toxic Substances Management (Active Army Supplement)

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SECTION 11

TOXIC SUBSTANCES MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

PCBs

- AR 200-1, *Environmental Protection and Enhancement*. Chapter 5, para 6, *Polychlorinated Biphenyls (PCBs)*, mandates Army compliance with the *Toxic Substances Control Act (TSCA)* and other applicable Federal statutes. It also outlines a recordkeeping system for PCBs and PCB-related Items.

Asbestos

- AR 200-1, *Environmental Protection and Enhancement*. Chapter 10, *Asbestos Management Program*, prescribes policy and procedures for managing asbestos and asbestos-containing material (ACM) and wastes. It requires compliance with all applicable Federal, state, and local regulations relative to asbestos management.

Radon

- AR 200-1, *Environmental Protection and Enhancement*. Chapter 11, *Army Radon Reduction Program (ARRP)*, describes policy and procedures for assessing indoor levels of radon and mitigating radon in structures where the levels are elevated. The program is decentralized; that is, each installation is responsible for funding, executing, documenting, and managing the radon monitoring and mitigation efforts based on ARRP.

B. Department of Defense (DOD) Directives and Instructions

- All applicable directives and instructions have previously been implemented by ARs.

C. Using the TEAM Guide for ECAS

- No additional instructions.

D. Key Army/DOD Compliance Requirements

- Asbestos Survey - Installations are required to have conducted a survey of all their structures.
- Asbestos Management Plan - The installation must prepare an Asbestos Management Plan that includes the following:
 1. a complete list of operations and maintenance schedules, design plans, and specifications that identify structures scheduled for repair, alteration, or demolition
 2. an installation-wide survey of all structures to determine the location, extent, and condition of all asbestos

3. documentation of the presence, extent, and condition of asbestos and assessment criteria
 4. an assessment for each occurrence of asbestos as to the potential for environmental release and risks to human health and the environment that was done by personnel meeting the management planner training requirements of the *Asbestos Hazard Emergency Response Act* (AHERA) and other applicable Federal, state, and local requirements
 5. preparation, coordination, and immediate implementation of abatement plans to minimize potential for asbestos exposure for each area where it exists
 6. preparation, coordination and immediate implementation of a special Operations and Maintenance (O&M) plan for each occurrence of asbestos to monitor the condition of asbestos and minimize releases and human exposure
 7. provision for worker education/training programs
 8. an environmental impact analysis of the Installation Asbestos Management Plan (as required by AR 200-2).
- Radon - ARRP applies to all major Army installations. The program is designed to assess radon levels on a priority basis using the following priority list: in family housing, administrative buildings (offices), dormitories, childcare facilities, temporary lodging facilities, etc. Detailed assessments will be accomplished at the installations where initial screening results identify a radon problem. Following mitigation, post mitigation assessments are conducted to ensure the effectiveness of the mitigation actions. Mitigation actions are prioritized using the table below:
 1. Priority 1: Daycare centers, hospitals, schools, and living areas (that is, quarters, unaccompanied personnel housing, and billets).
 2. Priority 2: Areas having 24-h operations, such as operations centers and training and research, development, test, and evaluating facilities.
 3. Priority 3: All other routinely occupied structures.

MITIGATION TIME FRAME
(AR 200-1, Chapter 11-3, Table 11-1)

Radon Level (pCi/L)	Mitigate:
Greater than 200 ¹	1 mo or move the occupants
200-20 ¹	6 mo
<20 - 8 ²	1-4 yr ³
<8 - >4 ²	5 yr
4 or less ¹	No action required

¹ Determine by 90-day screen or a 1-yr measurement in the case of Priority 2 and 3 structures.

² Annual average determined by 1-yr measurement. Screening measurements in this range will not be used as the basis for initiating mitigation actions.

³ Depending on the level of the measurement.

E. Key Compliance Personnel

PCBs

- The Directorate of Public Works (DPW), through the Exterior Electrical Shop, or the Environmental Coordinator (EC) is responsible for identifying, inspecting, marking (labeling), and properly servicing PCB Electrical Equipment (Transformers and Capacitors). Additionally the DPW will help develop and maintain the PCB Management Plan or standing operating procedure (SOP) and the installation's inventory of PCB equipment.
- The EC is responsible for ensuring that out-of-service items are located in a licensed and technically adequate PCB storage facility. Normally, such facilities are located at a Defense Reutilization and Marketing Office (DRMO) and the DRMO is responsible for storage, disposal transportation, and disposal contracts. Additionally, the EC will help develop and maintain the PCB Management Plan or SOP and the installation's inventory of PCB equipment.

Asbestos

- DPW establishes an installation asbestos management team and appoints an asbestos management control officer or team leader. The DPW will also maintain records of asbestos survey results and plans and updates the records as changes occur. DPW will maintain records for 30 yr after the last incidence of employee exposure to asbestos.
- Asbestos Management Team prepares the Asbestos Management Plan which contains documentation on all asbestos management efforts and the mechanism for oversight of the program. The team, as a minimum, consists of representatives from DPW, Environmental Office, Preventive Medicine, Safety Office, Civilian Personnel Office (CPO), Staff Judge Advocate (SJA), and Public Affairs Office (PAO).

Radon

- DPW is responsible for review of radon assessments and implementation of radon mitigation activities in accordance with ARRP.

F. Key Army/DOD Compliance Definitions

- *Army Radon Reduction Program (ARRP)* - a program whose objectives include the identification of structures owned and leased by the Army (continental United States (CONUS) and outside the continental United States (OCONUS)) that have indoor radon levels greater than 4 pCi/L of air and the modifications of those buildings found with excess levels of radon (AR 200-1, Chapter 11).
- *Facility* - buildings, structures, public works, equipment, aircraft, vessels, and other vehicles and property under control of, or constructed or manufactured for leasing to the Army (AR 200-1, Glossary, Section 2).
- *Industrial Installation* - an installation that has the primary mission of producing, maintaining, or rehabilitating military material (AR 200-1, Glossary, Section 2).

- *Lowest Living Area (LLA)* - is defined as follows (AR 200-1, para 11-5a):
 1. for structures without subsurface areas, the LLA is the ground floor
 2. for structures with subsurface areas, the LLA is defined as the lowest area in that structure that has a finished, hard surface floor (for example, concrete or tiled) that is or could be used. A dirt breezeway is not an LLA, but an unfinished basement with a concrete floor is, regardless of what the current occupants are using the area for.
- *Radon-222* - a naturally occurring, inert, radioactive gas that is formed from the radioactive decay of uranium (AR 200-1, para 11-3).

G. Records To Review in Addition To Those Listed in TEAM Guide

- Radon testing results
- Radon mitigation plans
- Radon annual reports

H. Physical Features To Inspect in Addition To Those Listed in TEAM Guide

- None

I. People To Interview

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Safety and Health Officer
- Fire Department
- Chief of Operations and Maintenance (O&M)
- Defense and Reutilization Marketing Office (DRMO)
- Utilities Division (Exterior Electric Shop)
- Preventive Medicine Personnel

J. Guidance for Active Army Toxic Substances Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBERS:
PCB Management All Installations	T1.1.1.A and T1.1.2.A	11-7
Asbestos Management All Installations	T2.1.1.A through T2.1.9.A	11-9
Radon All Installations	T3.1.1.A through T3.1.16.A	11-13

**COMPLIANCE CATEGORY:
TOXIC SUBSTANCES MANAGEMENT
U.S. TEAM Guide: Active Army Supplement**

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PCB MANAGEMENT T1.1 All Installations T1.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on PCBs, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). T1.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).	Determine if copies of the following, which are applicable, are maintained on the installations: - AR 200-1, <i>Environmental Protection and Enhancement</i>. - 40 CFR 761, <i>PCB Regulations</i>. - EO 12088, <i>Federal Compliance with Pollution Standards</i>. - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with PCB management by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented.

COMPLIANCE CATEGORY:
TOXIC SUBSTANCES MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
ASBESTOS MANAGEMENT T2.1 All Installations T2.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on asbestos, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). T2.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP). T2.1.3.A. Installations are required to conduct an asbestos survey (AR 200-1, para 10-2j and 10-3b(1) through 10-3b(3)).	Determine if copies of the following, which are applicable, are maintained on the installations: - 40 CFR 61, Subpart M, <i>USEPA National Emission Standards for Asbestos.</i> - 40 CFR 763, <i>Asbestos-Containing Materials in Schools.</i> - AR 200-1, <i>Environmental Protection and Enhancement.</i> - AR 385-10, <i>The Army Safety Program.</i> - AR 405-90, <i>Disposal of Real Estate.</i> - TB MED 502, <i>Occupational and Environmental Health: Respiratory Protection Program.</i> - TB MED 513, <i>Occupational and Environmental Health Guidelines for the Evaluation and Control of Asbestos Exposure.</i> - EO 12088, <i>Federal Compliance with Pollution Standards.</i> - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with PCB management by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented. Verify that survey was completed by 23 May 1991. Verify that the survey(s) was completed by accredited personnel who met the inspector training requirements of AHERA, and applicable Federal, state, and local requirements.

COMPLIANCE CATEGORY: TOXIC SUBSTANCES MANAGEMENT U.S. TEAM Guide: Active Army Supplement	
REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
T2.1.3.A. (continued)	Verify that personnel were supervised by a qualified industrial hygienist or other qualified environmental professional who meets the requirements of a competent person as specified in 29 CFR 1926.58(b). Determine if the survey is prioritized as follows: - buildings in aging or deteriorated condition that present significant exposure potential - structures that are occupied or likely to be occupied - structures to be repaired, altered, or demolished - Department of the Army (DA) controlled schools or child development centers - hospitals - residential housing. Verify that the annual followup inspections are being done by accredited personnel to identify and report damage and deterioration of asbestos.
T2.1.4.A. Installations are required to prepare, coordinate, and execute an Installation Asbestos Management Plan (AR 200-1, para 10-3).	Verify that an Installation Asbestos Management Plan has been prepared. Verify that the plan contains the following information: - a complete list of operations and maintenance schedules, design plans, and specifications that identify structures scheduled for repair, alteration, and demolition - an installation-wide survey of all structures to determine the location, extent, and condition of all asbestos - documentation of the presence, extent, and condition of asbestos and assessment criteria - an assessment for each occurrence of asbestos as to the potential for environmental release and risks to human health and the environment that was done by personnel meeting the management planner training requirements of AHERA and other applicable Federal, state, and local requirements - preparation, coordination, and immediate implementation of abatement plans to minimize potential for asbestos exposure for each area where it exists - preparation, coordination and immediate implementation of a special O&M plan for each occurrence of asbestos to monitor the condition of asbestos and minimize releases and human exposure - provision for worker education/training programs - an environmental impact analysis of the Installation Asbestos Management Plan (as required by AR 200-2). (NOTE: Asbestos Management Plans may be incorporated into existing environmental management documents.)

COMPLIANCE CATEGORY:
TOXIC SUBSTANCES MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
T2.1.5.A. Asbestos-related actions that have the potential to generate fugitive asbestos emissions must be environmentally assessed as specified in AR 200-2 (AR 200-1, para 10-4d).	Verify that the installation's asbestos management plans and asbestos-related actions that could produce fugitive asbestos emissions are environmentally assessed. Verify that if the environmental assessment (EA) results in a Finding of No Significant Impact (FNSI), the finding is published throughout the affected geographic area.
T2.1.6.A. Installations are required to identify in detail and validate the existence, extent, and condition of all asbestos, friable and nonfriable, in all structures prior to renovation, demolition, or excessing (AR 200-1, para 10-2k).	Verify that the installation has identified and verified the existence of both friable and nonfriable asbestos on all DA controlled structures prior to renovation, demolition, or excessing. Verify that employees, visitors, and contractors are notified of any asbestos-related health hazard.
T2.1.7.A. Installations are required to provide personnel working with asbestos with proper education, training and the necessary protective equipment (AR 200-1, para 10-2f, para 10-2i, and para 10-2q).	Verify that workers are provided with appropriate training and personal protective equipment as specified in AR 385-10, TB MED 502, 29 CFR 1910.1001, and 29 CFR 1926.59. Verify that a procedure exists to notify individuals who are occupationally exposed to asbestos.
T2.1.8.A. Employees working with asbestos are required to have physical examinations (TB MED 513).	Verify that all employees working with asbestos are given physical examinations as required by TB MED 513: - before beginning work with asbestos - annually while employed - at termination of employment.

COMPLIANCE CATEGORY:
TOXIC SUBSTANCES MANAGEMENT
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**REGULATORY
REQUIREMENTS:**

T2.1.9.A. Real property that contains ACM must be disposed of according to specific parameters (AR 200-1, para 10-2n and 10-2o).

REVIEWER CHECKS:
May 1995

Verify that all excess real property containing asbestos is disposed of in accordance with AR 405-90.

COMPLIANCE CATEGORY:
TOXIC SUBSTANCES MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
RADON T3.1 All Installations T3.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on radon, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). T3.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevent, noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).	Determine if copies of the following, which are applicable, are maintained on the installations: - AR 200-1, <i>Environmental Protection and Enhancement</i>. - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with radon management by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented.

**COMPLIANCE CATEGORY:
TOXIC SUBSTANCES MANAGEMENT
U.S. TEAM Guide: Active Army Supplement**

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
T3.1.3.A. All Army installations are required to perform radon measurements according to a prescribed prioritized schedule in order to identify Army structures with radon levels above 4 pCi/L with emphasis on identifying Priority I structures with levels greater than 20 pCi/L (AR 200-1, para 11-2a(3) and para 11-4).	Verify that the scheduled radon measurement has been performed as follows: - Priority 1: daycare centers, hospitals, schools, and living areas - Priority 2: areas having 24 h operations, such as operations centers, and training and RDTE facilities - Priority 3: all other routinely occupied structures. (NOTE: Priority 2 and 3 structures will be measured for radon depending on the results of the initial phase measurements for Priority 1 structures.) (NOTE: Leased buildings will be measured for radon, although remedial action is the responsibility of the owner.) Verify that all initial radon measurements were completed by the 4th quarter of fiscal year 1991 (FY91). Verify that records are prepared and maintained of all radon measurement results.
T3.1.4.A. Initial phase measurements of Priority 1 structures are required to be done according to specific standards (AR 200-1, para 11-5a).	Determine if all Priority 1 buildings at the installation have had an initial screening that met the following requirements: - radon detectors were in place for 90 days - detectors were placed in the LLA - radon detection was performed when buildings were closed (usually during winter or summer when windows and doors are shut due to heating or cooling).
T3.1.5.A. Long term measurement (LTM) for radon is required to be done according to specific methodology (AR 200-1, para 11-5b(1)).	Verify that LTM uses alpha track-type radon detectors for a 1-yr period under normal living conditions to establish an annual radon concentration.
T3.1.6.A. LTM for radon is required for Priority 2 and 3 structures if the results of the initial phase measurements of Priority 1 structures indicated radon concentrations greater than 4 pCi/L (AR 200-1, para 11-5b(2)).	Determine if any Priority 1 structures on the installation had a radon level of greater than 4 pCi/L. Verify that, if any Priority 1 structures on the installation had radon measurements of greater than 4 pCi/L, then LTM for radon was performed on all Priority 2 and 3 structures.

COMPLIANCE CATEGORY:
TOXIC SUBSTANCES MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
T3.1.7.A. When Priority 1 structures have radon levels of less than 4 pCi/L, but the conditions suggest that some Priority 2 and 3 structures may have higher levels, LTM for radon levels are required (AR 200-1, para 11-5b(2)).	Verify that, if all Priority 1 structures have less than or equal to 4 pCi/L, but the conditions suggest that some Priority 2 and 3 structures may have levels higher than 4 pCi/L radon, LTM for radon is done in Priority 2 and 3 structures.
T3.1.8.A. LTM of Priority 1 structures where the initial radon level measurement was above 4 and less than 20 pCi/L must be done according to specific procedures (AR 200-1, para 11-5b(3), and para 11-6a).	Determine whether Priority 1 buildings with an initial level of indoor radon of greater than or equal to 4 pCi/L but less than or equal to 20 pCi/L have undergone LTM as follows prior to mitigation: - single family structures: one detector in the LLA; if LLA is a basement, a second detector on the first floor - multiple family structures: one detector in LLA; if LLA is common open area, one detector for every 2000 ft² of area in LLA and one per apartment in floor above basement - office buildings and warehouses: one detector for every 2000 ft² in the LLA.
T3.1.9.A. Specific occupant notification requirements should be met when radon levels are exceeded (MP).	Verify that occupants of Priority One facilities are notified in writing of test results, planned or executed mitigation plans and their results. Verify that in Priority Two and Three facilities the radon test results and information is distributed by the facility managers.
T3.1.10.A. Elevated radon levels should be identified to the Installation Medical Officer (MP).	Verify that elevated radon levels are identified to the installation Medical Officer.
T3.1.11.A. All radon test results should be attached to real property records and transferred with property when property is sold, excessed, or transferred (MP).	Verify that all radon test results are attached to real property records and transferred with property when property is sold, excessed, or transferred.

**COMPLIANCE CATEGORY:
TOXIC SUBSTANCES MANAGEMENT
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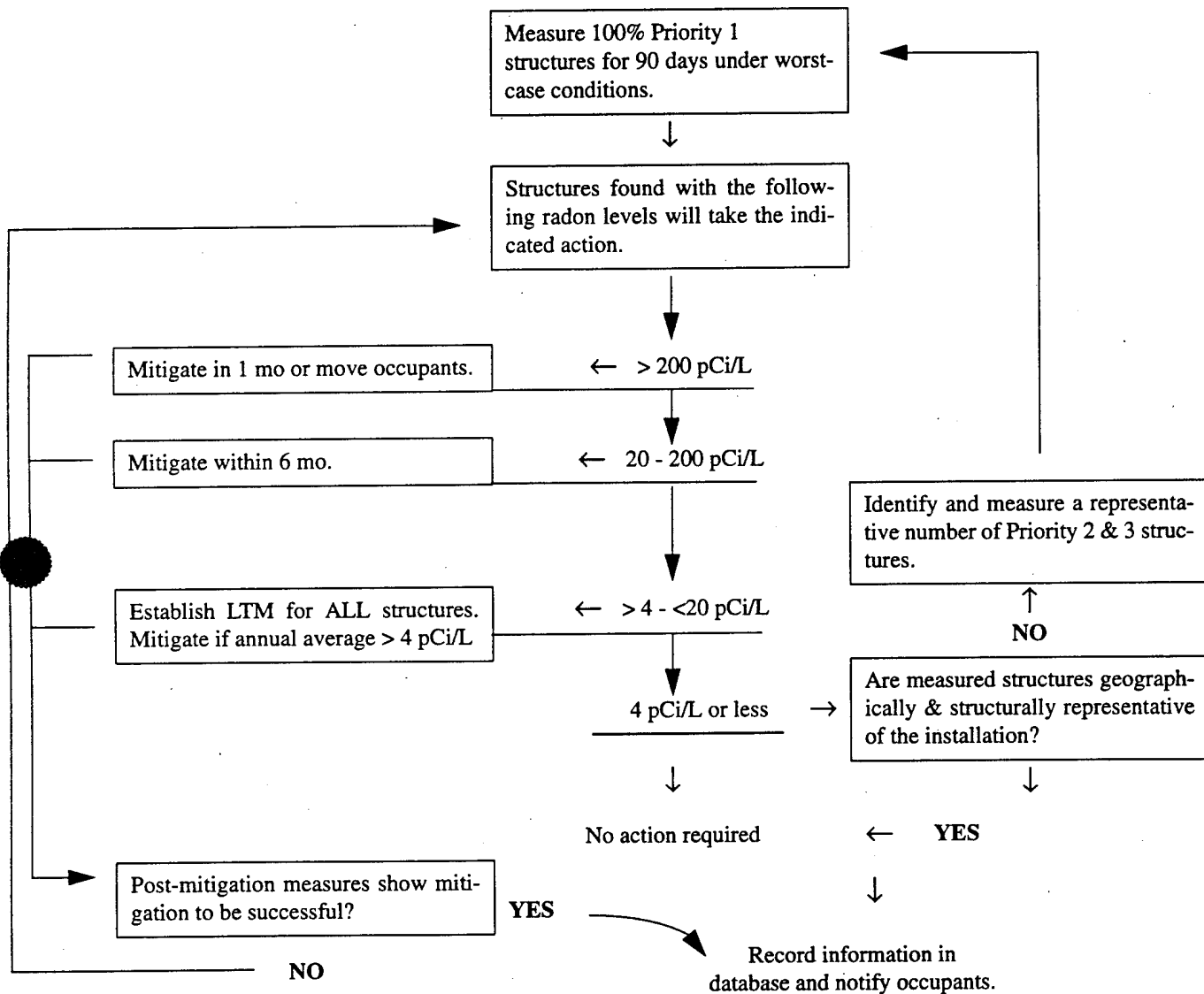
REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
T3.1.12.A. Installations are required to perform mitigation of structures as required by measured results (AR 200-1, Table 11-1).	Verify that the schedule for mitigation is complied with as follows (see Appendix 11-1): - buildings with indoor radon level greater than or equal to 4 pCi/L but less than or equal to 20 pCi/L have been mitigated according to the following schedule, based on the 12 mo LTM results for the buildings: - 4 pCi/L or less - no action taken - >4 to 8 pCi/L - mitigation completed within 5 yr - >8 to <20 pCi/L - mitigation completed within 1 to 4 yr, depending on the level of the measurement - buildings with initial or long term radon measurement levels that are greater than or equal to 20 pCi/L have been mitigated according to the following schedule: - 20 to 200 pCi/L - remedial action completed within 6 mo - < 200 pCi/L - remedial action completed within 30 days. If remedial action cannot reduce radon levels within 30 days, occupants must be relocated.
T3.1.13.A. Installations are required to perform post-mitigation measurement to confirm and document effectiveness of mitigation (AR 200-1, para 11-5c).	Verify that the following procedures are followed for structures with greater than or equal to 20 pCi/L radon: - charcoal canister-type detectors are used to provide rapid results (within days) - measurements are made under closed-house/worst-case conditions to initially verify mitigation effectiveness. Verify mitigation efficacy using LTM (1 yr) with alpha track-type detectors once levels are below established standards using rapid monitoring techniques. (NOTE: For structures greater than 20 pCi/L before mitigation, occupants may be returned to quarters based on acceptable levels from rapid monitoring.) Verify that the following post-mitigation procedures are followed for structures with less than 20 but greater than or equal to 8 pCi/L: - detectors that provide results within 90 days or sooner for worst-case, closed-house conditions are used - once radon levels are below established standards using the above method, verification of mitigation is assessed using LTM (1 yr). (NOTE: Structures with less than 8 but greater than 4 pCi/L may use detectors that provide results in 90 to 180 days under worst-case, closed-house conditions for verification.)

**COMPLIANCE CATEGORY:
TOXIC SUBSTANCES MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
T3.1.14.A. Installations are required to take steps to keep radon levels at or below 4 pCi/L (AR 200-1, para 11-1b(2)). T3.1.15.A. Annual reports must be prepared and submitted (AR 200-1, para 1-22j(2) and para 11-6d(2)). T3.1.16.A. Installations are required to maintain or have access to a database that will permanently capture all the information derived from the assessment and mitigation of radon (AR 200-1, para 11-2b(1)(g) and para 11-6d(1)).	Determine if the installation has modified owned structures so that levels are kept at or below 4 pCi/L. Verify that in new construction: - preventive measures have been incorporated to reduce radon migration - the radon level is being measured. Obtain a copy of the annual report and review it for the following: - number of structures at the installation - number of structures measured for radon - number of buildings with radon measurements - greater than 200 pCi/L - 20 to 200 pCi/L - >8 to <20 pCi/L - >4 to 8 pCi/L - equal to or less than 4 pCi/L - number of buildings mitigated - highest level of radon recorded at installation. Verify that at the end of each fiscal year the annual report is submitted to the Major Army Command (MACOM). Verify that installation maintains or has access to a database. Verify that all radon information is contained in a database.

Appendix 11-1

Schematic Flow Chart of the Actions Required by the Army Radon Reduction Program



Section 12

Wastewater Management (Active Army Supplement)

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E. Key Compliance Personnel	1
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SECTION 12

WASTEWATER MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

- AR 200-1, *Environmental Protection and Enhancement*. This AR, dated 23 May 1990, directs all Army facilities to comply with the provisions of the *Clean Water Act* (CWA). The Water Resources Management Program requires the Army to conserve all water resources, control or eliminate all sources of pollutants, cooperate with Federal, state, regional, and local authorities in forming and carrying out water pollution control plans, control runoff and erosion, and consider nonpoint source abatement in all construction, operation, and land management activities. The paragraph on the CWA (para 3-3) provides specific instructions for meeting compliance requirements. It covers discharge permits under the National Pollutant Discharge Elimination System (NPDES), site inspections, connection to municipal/regional wastewater systems, pretreatment standards, investigation of complaints, and notification procedures.
- AR 420-46, *Water and Sewage*. This AR, dated 1 May 1992, establishes policies and procedures governing facilities that supply water and dispose of sewage and industrial waste.

B. Department of Defense (DOD) Directives and Instructions

- All applicable directives and instructions have previously been implemented by ARs.

C. Using the TEAM Guide for ECAS

- No additional instructions.

D. Key Army/DOD Compliance Requirements

- Discharge Complaints - Each installation is required to have a system for investigating water pollution complaints and allegations from individuals and water pollution control authorities (AR 200-1, para 3-3g).
- Noncompliance Reporting - Noncompliance with NPDES and State Pollutant Discharge Elimination System (SPDES) permits must be reported to U.S. Army Environmental Center (USAEC) through command channels.
- Treatment Plant Operators - Personnel engaged or employed in operation and maintenance of water pollution control facilities are required to be trained and undergo periodic refresher training (AR 200-1, para 3-6).

E. Key Compliance Personnel

- The Directorate of Public Works (DPW) is responsible for monitoring wastewater discharge and stream water quality at selected locations around the installation. This responsibility may also fall to the Directorate of Environmental Quality (DEQ).

F. Key Army/DOD Compliance Definitions

- None

G. Records To Review in Addition To Those Listed in TEAM Guide

- Facility response plans required by the *Oil Pollution Act*

H. Physical Features To Inspect in Addition To Those Listed in TEAM Guide

- None

I. People To Interview

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Preventive Medicine Officer
- Fire Department
- Director of Logistics (DOL)
- Chief of Operations and Maintenance (O&M)
- Engineering, Plans, and Services (EP&S)
- Wastewater Treatment Plant Supervisor (O&M)
- Public Affairs Office (PAO)
- Staff Judge Advocate
- Central Vehicle Wash Facility Operating Supervisor
- Maintenance Officers (Company, Battalion, Brigade Site Units)
- Fuels Management Officer (DOL/DPW)
- Building and Grounds Division (DPW)
- Entomology Shop (DPW)
- TSDF Operators (DPW, DOL, DRMO)
- Safety
- Spill Response Team
- DRMO Personnel

J. Guidance for Active Army Wastewater Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBERS:
All Installations	WA.1.1.A through WA.1.3.A	12-5
NPDES Permits	WA.10.1.A	12-7
Treatment Works	WA.20.1 through WA.20.3.A	12-9

COMPLIANCE CATEGORY:
WASTEWATER MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

**REGULATORY
REQUIREMENTS:**

REVIEWER CHECKS:
May 1995

**WA.1
ALL INSTALLATIONS**

WA.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on wastewater, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP).

Verify current copies of the following, which are applicable, are maintained at the installation:

- 40 CFR 122, *The National Pollutant Discharge Elimination System.*
- 40 CFR 136, *Test Procedures for the Analysis of Pollutants.*
- 40 CFR 257, *Criteria for Classification of Solid Waste Disposal Facilities and Practices.*
- 40 CFR 323, *Permits for Discharges of Dredged or Fill Material Into Waters of the United States.*
- 40 CFR 401, *General Provisions.*
- 40 CFR 403, *General Pretreatment Regulations for Existing and New Sources.*
- 40 CFR 413, *Electroplating Point Source Category.*
- 40 CFR 423, *Steam Electric Power Generating Point Source Category.*
- 40 CFR 433, *Metal Finishing Point Source Category.*
- 40 CFR 459, *Photographic Point Source Category.*
- 40 CFR 460, *Hospital Point Source Category.*
- 40 CFR 503, *Standards for Use or Storage of Sewage Sludge.*
- EO 12088, *Federal Compliance with Pollution Standards.*
- AR 200-1, *Environmental Protection and Enhancement.*
- TM 5-665, *Operations and Maintenance of Domestic and Industrial Wastewater Systems.*
- *Standard Methods for Water/Wastewater Analysis.*
- applicable state and local regulations.

Determine if current state/local wastewater discharge regulations are maintained and followed at the installation.

**COMPLIANCE CATEGORY:
WASTEWATER MANAGEMENT
U.S. TEAM Guide: Active Army Supplement**

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
WA.1.2.A. Management and organization of paperwork, materials; and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP). WA.1.3.A. Each installation is required to have a system for investigating water pollution complaints and allegations from individuals and water pollution control authorities (AR 200-1, para 3-3g(1) and 3-3g(2)).	Determine what management systems are in place. Verify that the existing system addresses the issues associated with wastewater management by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Verify that installation environmental policies and regulations are sufficient and fully implemented. Determine if there are procedures for investigating water pollution complaints and allegations. Verify that any cases of legal or potential legal action were reported immediately through Judge Advocate channels to Army Headquarters.

COMPLIANCE CATEGORY:
WASTEWATER MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

**REGULATORY
REQUIREMENTS:**

REVIEWER CHECKS:
May 1995

WA.10
NPDES PERMITS

WA.10.1.A. Noncompliance must be reported (AR 200-1, para 3-3a(4)).

Determine if potential problems that might cause installation to be in noncompliance with permits are reported.

Verify that enforcement action reports are sent through command channels to:

USAEC
ATTN: SFIM-AEC-ECP.

**COMPLIANCE CATEGORY:
WASTEWATER MANAGEMENT
U.S. TEAM Guide: Active Army Supplement**

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
WA.20 TREATMENT WORKS WA.20.1.A. Personnel engaged or employed in operation and maintenance of water pollution control facilities must be trained to meet state or local requirements (AR 200-1, para 3-6). WA.20.2.A. Supervisors at Army treatment plants are required to provide training in safety and occupational hazards to operating staff (TM 5-665, para 17-1). WA.20.3.A. Treatment plant supervisors are required to maintain certain operating logs and records (TM 5-665, para 16-3).	Verify that periodic training is conducted by interviewing operating/maintenance staff at plant and reviewing the operating staff training records. Verify that safety and occupational hazards instructions are posted around the plant or readily available to plant personnel. Verify that continual training is conducted on proper safety practices at the plant. Verify that logs and records of the plant supervisor of the domestic wastewater plant are present. Verify that forms are posted daily and are neat and legible. Check with treatment plant supervisor and compare industrial wastewater effluent with permit limitation. Verify that copies are distributed as follows: - original retained by DPW - duplicate to MACOM - required copies are submitted to state.

Section 13

Water Quality Management (Active Army Supplement)

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SECTION 13

WATER QUALITY MANAGEMENT

A. U.S. Army Regulations (ARs) and Policies

- AR 420-46, *Water Supply and Wastewater*. This AR, dated 1 May 1992, establishes policies and procedures governing installations that supply water and dispose of sewage and industrial wastes. It applies to all Department of the Army (DA) installations. In general, it addresses the following facilities engineering activities: the furnishing of sewage services; operations of water and sewage pumping and treatment plants; the maintenance, repair, and alteration of facilities and appurtenances required for the production, pumping, treatment, and distribution of water; and the collection and disposal of sewage and industrial waste.

B. Department of Defense (DOD) Directives and Instructions

- All applicable directives and instructions have previously been implemented by ARs.

C. Using the TEAM Guide for ECAS

- No additional instructions.

D. Key Army/DOD Compliance Requirements

- Recordkeeping - The Directorate of Public Works (DPW) must keep records of actions taken to correct or repair any part of the distribution system. The installation is also required to prepare and keep current water supply distribution system, sectional, and valve-location maps (AR 420-46, para 5c and para 11-1).
- Emergency Notifications - Installations are required to have a standing operating procedure (SOP) for alerting personnel in national or local emergencies or times of actual or anticipated noncompliance (AR 420-46, para 5d).
- Swimming Pools - Installation personnel are responsible for maintaining appropriate pH, chlorine residuals, coliform levels, and testing (AR 420-46).

E. Key Compliance Personnel

- Preventive Medicine Office (PMO) is responsible for coordinating with the DPW to review and interpret drinking water sampling procedures and analyses for health implications, act as a liaison with state regulatory authorities when maximum contaminant levels (MCLs) are exceeded, and perform sanitary surveys or inspections of water treatment facilities as necessary.
- DPW designs, constructs, and operates the water distribution system to provide sufficient drinking water to installation personnel. The DPW is responsible for providing adequate water treatment to assure drinking water does not exceed the maximum contaminant levels established for human consumption. Training of operating personnel to meet proficiency levels consistent with the operator

certification requirements that apply to their location is also the responsibility of the DPW. It also maintains an up-to-date map of the complete potable water system, makes repairs, and maintains the system. The DPW is also responsible for negotiating and maintaining the installation's water supply contract.

F. Key Army/DOD Compliance Definitions

- None

G. Records To Review in Addition To Those Listed in TEAM Guide

- Swimming pool treatment records

H. Physical Features To Inspect in Addition To Those Listed in TEAM Guide

- Swimming pools

I. People To Interview

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Preventive Medicine Officer
- Chief of Operations and Maintenance (O&M)

J. Guidance for Active Army Water Quality Management Checklist Users

	REFER TO CHECKLIST ITEMS:	REFER TO PAGE NUMBERS:
All Installations	WQ.1.1.A through WQ.1.6.A	13-5
Miscellaneous Requirements	WQ.4.1.A and WQ.4.2.A	13-7
Public Water Systems Lead and Copper	WQ.25.1.A	13-9

COMPLIANCE CATEGORY:
WATER QUALITY MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
WQ.1 ALL INSTALLATIONS WQ.1.1.A. Copies of all relevant Federal, DOD, Army, and state/local regulations, and guidance documents on water quality, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP). WQ.1.2.A. Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP). WQ.1.3.A. DPW must keep records of actions taken to correct or repair any part of the distribution system (AR 420-46, para 11-1).	Verify that the following, which are applicable, are current and readily available: - 40 CFR 141, <i>National Primary Drinking Water Regulations</i>. - 40 CFR 149, <i>Sole Source Aquifers</i>. - EO 12088, <i>Federal Compliance with Pollution Standards</i>. - AR 420-46, <i>Water Supply and Wastewater</i>. - TM 5-660, <i>Maintenance and Operation of Water Supply, Treatment, and Distributions Systems</i>. - TB MED 575, <i>Occupational and Environmental Health: Swimming Pools and Bathing Facilities</i>. - applicable state and local regulations. Determine what management systems are in place. Verify that the existing system addresses the issues associated with water quality management by: - interviewing personnel - reviewing paperwork - observing the operation or activity. Determine if training is being conducted. Check contract for purchase of water to determine compliance with conditions contained in contract (i.e., quality, quantity, connections, etc.). Verify that installation environmental policies and regulations are sufficient and fully implemented. Determine if there have been any changes to water system since the previous review and review the map of complete potable water system. Verify that water system records pertaining to operational changes have been maintained for at least 3 yr.

COMPLIANCE CATEGORY:
WATER QUALITY MANAGEMENT
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REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
WQ.1.4.A. The installation is required to prepare and keep current water supply distribution system maps (AR 420-46, para 2-7). WQ.1.5.A. Installations are required to have a SOP for alerting personnel in national or local emergencies or times of actual or anticipated non-compliance (AR 420-46, para 2-6b). WQ.1.6.A. The EC should review plans for water system modifications (MP).	Verify that water supply distribution system maps are kept current. Verify that an SOP is in place and that it defines the duty of each individual. Verify that the SOP is current. Determine if the EC has reviewed the plans.

COMPLIANCE CATEGORY: WATER QUALITY MANAGEMENT U.S. TEAM Guide: Active Army Supplement	
REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
WQ.4 MISCELLANEOUS REQUIREMENTS WQ.4.1.A. The operation, maintenance, and repair of swimming pools will be done according to the standards outlined in TB MED 575 (AR 420-46, para 9-1 and 9-4).	Verify, by interviewing the staff maintaining the pool, that the following is being done: - the pH of the pool does not drop below 7.2 - chlorine residuals and pH are determined at least every 2 h when the pool is in use - records for pH and chlorine are maintained for at least two swimming seasons - when the membrane filter technique is used to determine the number of coliform colonies, if the coliform density is greater than or equal to 2 colonies/100 mL, a resample is collected immediately, if the resample is greater than or equal to 2 colonies/100 mL, the pool is closed until the cause is identified and eliminated - when the multiple tube fermentation technique is used a positive sample (one or more of the five tubes) requires an immediate resample, if resamples are also positive, the pool is closed until the source of the contamination is eliminated and additional samples are negative - in terms of heterotrophic plate count, after incubation of the nutrient agar plates for 48 h at 35 +/- 0.5 °C, the bacterial count is less than or equal to 200 bacteria/mL in greater than 85 percent of the samples examined in the last 30 days - samples for bacteriologic examinations and concurrent pH and chlorine residual measurement are collected at least once a week. Verify that an operating log is kept. (NOTE: TM-5-662 also contain guidance on the operation and management of swimming pools.)
WQ.4.2.A. Preventive Medicine (PVTMED) personnel are required to perform specific duties in relationship to swimming pools and swimming areas (AR 40-5, para 12-6b).	Verify that PVNTMED personnel inspect on a periodic basis the swimming facilities and operational logs to ensure that the operations and monitoring required by TB MED 575 are being done. Verify that PVNTMED personnel: - perform annual preseason and/or preopening inspections of swimming facilities - perform bacteriological sampling according to TB MED 575 - ensure that chlorine residual analyses are done by an approved method - maintain records of sanitary surveys, inspections, results of bacteriological analyses and other pertinent information - conduct a yearly sanitary survey of all natural swimming areas under installation control.

COMPLIANCE CATEGORY:
WATER QUALITY MANAGEMENT
U.S. TEAM Guide: Active Army Supplement

REGULATORY REQUIREMENTS:	REVIEWER CHECKS: May 1995
PUBLIC WATER SYSTEMS WQ.25 Lead and Copper WQ.25.1.A. Installations should have initiated a program to reduce exposure of lead to children and should have completed an inventory and replacement of drinking water coolers in child care and school facilities (MP).	Verify that the childcare centers and schools have tested for lead in the drinking water coolers and replaced those that posed a threat to the children.

