

## Appendix Q

### Pollution Prevention, Environmental Management System, and Sustainability

**Q-1. Purpose.** This appendix outlines policy, establishes responsibilities, and provides operating guidance to meet federal, state, and Army requirements for pollution prevention and an Environmental Management System (EMS), which integrates pollution prevention into the functional framework of the installation. These approaches support the ideal of environmental sustainability – maintaining operations and activities without harm to the environment.

#### Q-2. General.

##### a. Pollution Prevention.

(1) Is any reasonable mechanism or method to successfully avoid, prevent, or reduce pollutant discharges or emissions other than by the traditional method of treating pollution at the discharge end of a pipe or stack.

(2) Is a proactive environmental management approach addressing the elimination and/or reduction of all types of waste as well as natural resource conservation; use of sustainable design and development; and can be implemented at any stage of the pollution management hierarchy.

(3) Is the Army's preferred approach to environmental management and maintaining compliance with environmental laws and regulations.

(4) Fosters sustainability to support the viability of Army training platforms, installation infrastructure, and the needs of the surrounding community.

##### b. Federal Pollution Prevention Policy Documents.

(1) The Pollution Prevention Act of 1990 establishes a national policy that "pollution should be prevented or reduced at the source whenever feasible." The Pollution Prevention Act establishes the waste management hierarchy of source reduction, recycling, treatment, and then disposal.

(a) Source reduction has the highest priority in the hierarchy.

(b) When source reduction cannot be achieved, recycling and reuse are preferred over treatment.

(c) When treatment is not possible, environmentally sound disposal is used as the last option, after all other options have been exhausted.

(2) Other federal laws promote pollution prevention by establishing stringent requirements for the management of hazardous materials (HM), solid waste (SW), universal waste (UW), and hazardous waste (HW). These requirements strongly support the implementation of pollution prevention initiatives to minimize the amounts of material or waste managed and thereby reduce the burdens imposed by the laws. These laws and their pollution prevention aspects include:

(a) Clean Water Act (CWA): Reduce and eventually eliminate the discharge of pollutants into waterways.

(b) Clean Air Act (CAA): The amendments of 1990 added pollution prevention as a primary goal of the Act.

(c) Resource Conservation and Recovery Act (RCRA): The hazardous and solid waste amendments of RCRA established as national policy the reduction or elimination of HW generated whenever possible.

(d) Comprehensive Environmental Response, Compensation and Liability Act (CERCLA): Indirectly supports pollution prevention through its liability provision. Any mismanagement of HM can result in liability and consequent enforcement action by a regulating agency.

(e) Emergency Planning and Community Right-to-Know Act (EPCRA): Minimization of hazardous substance usage is an EPCRA goal. The Act promotes pollution prevention by requiring facilities meeting reporting criteria to report on the physical and chemical hazards, amounts, locations, and methods of storage for hazardous chemicals stored, and to report annually on toxic releases to the environment.

(3) Executive Order 13101, 14 September 1998, Greening the Government Through Waste Prevention, Recycling and Federal Acquisition, directs federal agencies to improve waste prevention, recycling and the purchase and use of recycled content and environmentally preferable products and services.

(4) Executive Order 13148, 21 April 2000, Greening the Government Through Leadership in Environmental Management, directs Federal agencies to ensure all necessary actions are taken to integrate environmental accountability into agency day-to-day decision making and long-term planning processes, across agency missions, activities, and functions.

c. The Army Pollution Prevention Program. It is outlined in HQDA LTR 200-94-1, Army Pollution Prevention Program, 19 January 1994. The letter establishes Army policy and goals, and assigns responsibilities for management of the Army pollution prevention program, so as to reduce the reliance on products or processes that generate environmentally degrading impacts to as near zero as possible. The following policy provisions of the document affect Fort Eustis:

(1) Reduce total Army releases of toxic pollutants to the environment (and off-site transfers for treatment and disposal) by no less than 50 percent by 31 December 1999, from a baseline established not later than December 1994. DOD will update these goals when DOD finalizes its list of 15 toxic chemicals to be reduced by 50% by 31 December 2006.

(2) Conduct multi-media pollution prevention assessments and establish pollution prevention plans at all Army installations. Establish multi-media programs to implement the pollution prevention plans.

(3) Emphasize the procurement of non-hazardous rather than hazardous materials whenever practical.

(4) For all Army requirements, favor the use of recycled materials in accordance with Executive Order 13101.

(5) Place continued emphasis on increasing the percent/amount of recyclable material diverted from the municipal waste stream.

(6) Accomplish pollution prevention reporting in accordance with Executive Order 13148.

(7) Incorporate pollution prevention and sustainability principles into Army activities, including the following, to the greatest extent possible:

(a) Operations and training.

(b) All phases of contingency operations: mobilization, deployment, operations, redeployment, and demobilization.

(c) Logistical activities (supply, maintenance, transportation, facilities, and services).

(d) Planning, construction, renovation, and demolition throughout the infrastructure life cycle.

(e) Base operations and installation support activities.

(f) Health and medical activities.

(g) Energy plans and programs.

(8) Include Pollution prevention in the installation Mission Essential Task List (METL) and/or core competencies.

d. The Fort Eustis Pollution Prevention Plan was prepared in accordance with Executive Order 13148. Oversight for Plan implementation is provided by the DPW-ENRD. The Plan is maintained by the Environmental and Natural Resources Division (ENRD), Public Works (PW) and updated as required.

### **Q-3. Pollution Prevention Policy and Pollution Reduction Goals.**

a. It is Fort Eustis policy to:

(1) Foster pollution prevention and sustainability awareness and seek pollution prevention opportunities throughout Fort Eustis and its sub-installations in all mission areas.

(2) Minimize the quantities of hazardous or environmentally unacceptable materials requisitioned, stored, and used.

(3) Systematically reduce or eliminate use of HM, operations and processes that produce HW and environmentally harmful emissions.

(4) Comply with the applicable provisions of the Pollution Prevention Act, EPCRA, Executive Orders 13101 and 13148 and other applicable federal guidance; and the Army Pollution Prevention Program.

b. Pollution Prevention Reduction and EMS Goals.

(1) DOD has established a new Measure of Merit that requires Fort Eustis to set a pollution reduction goal for non-hazardous solid waste to ensure a greater than 40% diversion rate by the end of FY 2005. This goal will be attained while ensuring integrated non-hazardous solid waste management programs provide an economic benefit when compared with disposal using landfill and incineration alone

(2) ENRD and installation representatives from designated activities will establish performance goals for major Fort Eustis processes/programs. These goals will be documented in the Fort Eustis Pollution Prevention Plan, disseminated to the EQCC for management review, and updated as appropriate.

### **Q-4. Responsibilities.**

a. The Commander, U.S. Army Transportation Center and Fort Eustis will:

(1) Chair the Environmental Quality Control Committee to function as a management tool for implementing environmental management system and sustainability concepts throughout the installation.

(2) Emphasize the importance of integrating pollution prevention and EMS as part of daily work routines and “Best Business Practices” into installation goals, objectives and vision statements.

(3) Function as the Senior Approving Official (SAO) for requisitions and contracts requiring the procurement and/or use of Class I ozone-depleting chemicals (ODCs) for which there is no acceptable substitute. The ODC management program is discussed in Appendix O of this regulation.

b. The Fort Eustis Garrison Commander (GC) will incorporate pollution prevention and/or sustainability concepts into the installation Core Competencies/Mission Essential Task List (METL).

c. The DPW will:

(1) Have staff proponenty for the installation pollution prevention program, and will execute the program through the Environmental and Natural Resources Division (ENRD).

(2) Insure that MSDSs for HM to be used by JOC/Griffin Services and other DPW contractors is coordinated through the DPW-ENRD for approval and that this is specified in contracts.

(3) Insure that DPW credit card holders do not procure HM. It must be procured through the Fort Eustis Hazmart. At Fort Story, activities will obtain HM through the Little Creek Hazardous Material Minimization Center. See TCFE Reg 700-1 for more detail.

(4) Foster pollution prevention awareness and actions in DPW operations, with emphasis on identifying P2 opportunities in design, new construction, renovation and demolition activities by using the Sustainable Project Rating Tool (SPIRIT) criteria developed by the Corps of Engineers.

(5) Establish baselines, performance goals and assess annual progress toward goal attainment as part of the EMS and installation sustainability program in the following:

- (a) Solid waste reduction.
- (b) Energy consumption.
- (c) Reduction in HM use.
- (d) Reduction in HW generation.
- (e) Pesticide use.
- (f) Air emissions.
- (g) Water consumption.
- (h) Recycling.

d. The ENRD will:

(1) Provide the Installation Pollution Prevention Coordinator/Environmental Management System coordinator.

(2) Maintain the U.S. Army Transportation Center and Fort Eustis Pollution Prevention Plan and coordinate execution of the Plan.

(3) Develop and conduct annual pollution prevention/EMS training.

(4) Maintain the Pollution Prevention Database which tracks usage of hazardous materials, to include Section 313 chemicals, ODCs, and Hazardous Air Pollutants

(5) Review MSDSs for products proposed for purchase by installation activities

(6) IAW the Pollution Prevention Plan:

- (a) Review annual inventories of HM storage and use, HW reduction, and changes in processes.
- (b) Collect quarterly data on HM storage and/or use from Fort Eustis and Fort Story Hazmarts and installation units/agencies.
- (c) Conduct a biennial evaluation and prepare a progress report on pollution prevention/EMS goal attainment.
- (d) Track all types of pollution prevention equipment, to include, but not limited to parts washers, solvent sinks, and HM recycling equipment.
- (7) Prepare Toxic Release Inventory (TRI) and Tier II reports required under EPCRA, and other reports required by Army, state, and federal regulations.
- (8) Coordinate implementation of EMS/Sustainability concepts in installation management to include service, maintenance, repair, and construction contracts.

e. The DOL will:

- (1) Manage the Hazardous Material Program IAW TCFE Reg 700-1, Hazardous Material Management Program. Insure that only HM which is on individual established AULs is requisitioned for supply and distribution to Fort Eustis users.
- (2) Insure that installation credit card holders do not use these cards to procure hazardous materials.
- (3) Foster pollution prevention awareness and actions in DOL operations, with emphasis on installation vehicle/aircraft maintenance and painting activities. Ensure workers follow appropriate SOPs to ensure equipment such as paint booths, blast facilities, and solvent sinks function properly.

f. The Northern Region Contracting Center – Installation Division will :

- (1) Ensure that contracts and requisitions processed through the DPC for approval, if requiring the use of HM, are coordinated through DPW -ENRD.
- (2) Emphasize the procurement during credit card holder training of material containing the maximum post-consumer recycled content practicable and those products which are designated as environmentally preferable products as required by the Affirmative Procurement Program (Executive Order 13101 and Executive Order 13148).
- (3) Coordinate with DPW –ENRD to ensure that all FAR clauses related to environmental management are included in all contracts.

g. The Commander, MAMC will:

- (1) Foster pollution prevention awareness and actions in health and medical activities.
- (2) Develop pollution prevention performance goals for medical activities and coordinate the goals with the ENRD.

h. Commanders/directors of installation and tenant organizations that store and/or use HM or generate HW in the course of performing their operational mission will:

- (1) Foster pollution prevention awareness and action through:
  - (a) Compliance with the requirements in paragraph 5, Pollution Prevention Actions, below, and periodic assessment of processes for opportunities to modify or replace the process so as to reduce the use of HM and/or the generation of SW and/or HW.

- (b) The requisition and use of only HM which is on their individual unit/activity AUL.

(2) Submit the Quarterly Hazardous Material Inventory and Munitions Expenditure Report, using the procedures in Appendix G Hazardous Material Management, this regulation.

**Q-5. Pollution Prevention Actions.** The actions described below are major aspects of the Fort Eustis Pollution Prevention Plan. Compliance with applicable requirements is mandatory for all organizations and personnel on Fort Eustis and its sub-installation. Additional details are available from the Installation Pollution Prevention Coordinator (878-4123, ext 299).

a. Authorized Use List (AUL). The AUL is a listing of HM approved for use in processes at Fort Eustis and its sub-installations. Only HM on the AUL will be used and requisitioned. Each unit/activity will have an AUL established for use in their specific processes. The AUL is subject to frequent modifications and will have HM added and deleted as approved by ENRD. See TCFE Reg 700-1, Hazardous Material Management Program for more information.

- b. HM procurement. Each Command and/or installation or tenant activity procuring hazardous materials will:

- (1) Follow the procedures in TCFE Reg 700-1, Hazardous Material Management Program.

- (2) If the Hazmart was not used for procurement of the HM (some compressed gases may not be carried by Hazmart), provide a quarterly report to the EPCRA Program Manager at ENRD. The report will detail HM procured during the quarter (including local purchase), to include item description, quantity, and cost.

c. Pollution Prevention (P2) Equipment. All installation units/organizations will provide an update to a biennial inventory of pollution prevention equipment, to include, but not limited to, parts washers, solvent sinks, bulk fluid distribution units, drive on containment systems, and recycling units, with the DPW-ENRD. The inventory documents the P2 equipment used by the installation.

d. RCRA 6002. Annual reporting for RCRA 6002 for coolant recycled, re-refined oil purchased, and retread tires procured. If applicable, each Command, activity, and /or tenant (USATSCH, DOL (Hazmart). DPCA, 7<sup>th</sup> Group, USAALS, 8<sup>th</sup> Bde, 99<sup>th</sup> RSC) will maintain records of above items procured during the CY using reporting forms provided by ENRD.

e. Affirmative Procurement. This program directs the use of recycled content products, environmentally preferable products, and bio-based products when available and cost effective. Appendix S provides more detail about affirmative procurement.

f. EMS. Designated activities will participate in an annual goals setting session for EMS. They will also participate in work teams which will recommend improvements in work processes or programs which will improve mission accomplishment through awareness of the environmental impacts of processes and programs.

**Q-6. Pollution Prevention Training.**

a. ENRD will incorporate pollution prevention awareness and principles in the following scheduled training courses:

- (1) Basic, Intermediate, and Advanced Environmental Management Courses for Activity Environmental and Hazardous Waste Coordinators

- (2) Recycling Coordinator Course

- (3) Environmental Management System Course

(4) Officer and NCO Professional Development Course.

b. Commanders/directors of assigned and tenant organizations that store and/or use HM or generate SW and/or HW in the course of performing their operational mission will conduct recurring awareness training to promote and encourage pollution prevention. Briefing materials and other technical assistance are available from the Pollution Prevention Coordinator (878-4123, ext 299).