



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS 99TH REGIONAL SUPPORT COMMAND  
99 SOLDIERS WAY  
CORAOPOLIS PA 15108-2550

15 March 2006

Army Reserve Garrison

Virginia Environmental Excellence Program  
Virginia DEQ  
Office of Pollution Prevention  
PO Box 10009  
Richmond, Virginia 23240-0009

Dear Sir or Madam

1. The 99<sup>th</sup> Regional Readiness Command (99th RRC) operates and maintains 39 facilities across the Commonwealth of Virginia. The 99th RRC mission is to organize and prepare assigned U.S. Army Reserve units for mobilization in support of contingency, special, and war plans.
2. We enclosed our application for the Virginia Environmental Excellence Program (VEEP), and included the details of the Environmental Management System elements you requested.
3. Most of our facilities are tenants at other Department of Defense facilities. We only included the thirteen 99<sup>th</sup> RRC-owned facilities in this application.
4. Please review and process this application. Our point of contact is Michelle Brown, 804-675-7307.

A handwritten signature in black ink, appearing to read "Paul M. Burnham".

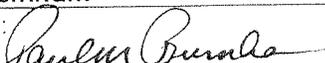
Paul M. Burnham  
Lieutenant Colonel, U.S. Army Reserve  
Regional Engineer

Enclosures

## Virginia Environmental Excellence Program Application

Section 1: General Facility/Organization Information	
Facility Name: <b>99<sup>th</sup> Regional Readiness Command. See attached spreadsheet for individual facility information.</b>	
Street Address: <b>99 Soldiers Way, Coraopolis, PA 15108-2550</b>	
Mailing Address: <b>Monteith USARC, 1741 East Belt Boulevard, Richmond, VA 23224-54913</b>	
Contact Name: <b>Michelle Brown</b>	Standard Industrial Classification (SIC) Code: <b>9711 – National Security</b>
Phone: <b>804-675-7307</b>	Environmental Permit Numbers (list all, including permits from agencies other than DEQ): <b>See attached</b>
Fax: <b>804-233-2181</b>	
Email: <b>michelle.brown5@us.army.mil</b>	
Previous Facility Names (within past 5 years): <b>None</b>	Water Source (e.g., public water supply, groundwater, etc.): <b>Public Water Supply</b>

Section 2: Type of Participation	
This application is for:	
<input checked="" type="checkbox"/> Environmental Enterprise (E2) [see Section 3]	
<input type="checkbox"/> Exemplary Environmental Enterprise (E3) [see Section 4]	
<input type="checkbox"/> Extraordinary Environmental Enterprise (E4) [please contact Sharon Baxter at 804-698-4344 for more information on applying for E4]	
Name <b>Paul M. Burnham</b>	Title <b>Regional Engineer</b>
Signature 	Date <b>17 Mar 06</b>

<p><i>Certification Statement:</i> By submitting this application the undersigned acknowledges that participation in this program is entirely voluntary. The undersigned accepts and hereby waives any right to appeal any decision made by DEQ with respect to this application regarding participation in or termination from this program.</p>	
Name of Certifying Official: <b>Paul M. Burnham</b>	Title: <b>Regional Engineer</b>
Signature: 	Date: <b>17 Mar 06</b>

## Section 3: E2 Application

The development and implementation of effective environmental management systems (EMS) is the primary goal of VEEP. DEQ does not prescribe the model or type of EMS or the structure of a facility's environmental programs. However, DEQ is responsible for verifying that each facility accepted into VEEP meets the program criteria. Therefore, each E2 applicant is required to address several key points related to its EMS. Please provide documentation that shows that the following components are in place at your facility:

**Policy Statement:** Attach the facility's Policy Statement outlining its commitment to the environment. When reviewing each application, DEQ staff will look for a environmental policy statement that:

- Includes/stresses compliance, pollution prevention, training, communication & continuous improvement
- Addresses elements that are supported by EMS activities

**Identification of Environmental Impacts:** Describe the facility's process for identifying and evaluating its environmental impacts. At a minimum, include a list of the facility's most significant environmental impacts. When reviewing each application, DEQ staff will look for:

- Comprehensive list of impacts/aspects
- Method for determining significant impacts/aspects
- Impact/aspect review process outlined
- Scheduled review and reevaluation of impacts

**Setting Objectives and Targets:** Please include a list of the facility's goals (objectives) for reducing environmental impacts. Ideally, objectives will include numerical goals with projects designed to achieve these goals. The objectives should include targets or a schedule for completing tasks and/or achieving the stated objectives. When reviewing each application, DEQ staff will look for:

- Goals (or objectives) which address your significant impacts/aspects
- Tasks or projects planned for addressing each goal/objective with a targeted schedule for implementation

**Pollution Prevention:** In a typical EMS structure, objectives and targets may only address the impacts identified as the most "significant." For the pollution prevention section, please feel free to list any other environmental projects that are ongoing or planned. If possible, please include quantified reductions realized or expected and any cost savings. When reviewing each application, DEQ staff will look for:

- A dedicated P2 section listing projects & accomplishments
- Reduction numbers and cost savings
- Addressing P2 activities outside of significant impacts/aspects

**E2 Environmental Results & Commitments:** Facilities are required to report annually on the results of their EMS and pollution prevention efforts (annual reports are due April 1<sup>st</sup> of each year). Establishing baseline data and tracking results is essential in order to evaluate the effectiveness of an EMS. A comprehensive EMS may address a wide array of environmental impacts including solid waste, water use, wastewater, energy usage, air impacts, etc.

The ability to measure and report progress is also critical to the administration and overall tracking of VEEP. Ideally, each participating facility will establish baselines and track progress on all of the environmental measures that are being addressed through their EMS. At a minimum, **E2 facilities are required to commit to track EMS results in at least one of the following categories (a list of specific subcategories or "indicators" for each of the categories is available on the VEEP website):**

- |                                      |  |   |
|--------------------------------------|--|---|
| <input type="checkbox"/> Solid waste | <input type="checkbox"/> Solid waste recycling | <input checked="" type="checkbox"/> Hazardous waste |
| <input type="checkbox"/> Water use   | <input type="checkbox"/> Water discharges      | <input type="checkbox"/> Air emissions              |
| <input type="checkbox"/> Energy use  | <input type="checkbox"/> Land Preservation     | <input type="checkbox"/> Land restoration           |

In the annual report, facilities will be expected to provide a quantified baseline and results for the past year's efforts in each of these indicated categories. Facilities will also have the opportunity to provide reduction data in additional categories in the annual reporting process.

**E2 Environmental Compliance Requirements:**

E2 facilities must also have a record of significant compliance with environmental laws and be in significant compliance with all applicable environmental requirements. The scope of this screen and the screening criteria will be consistent with the compliance requirements established by the 2005 Virginia legislation related to VEEP. See the VEEP website for more information.

## Section 4: E3 Application

The development and implementation of effective environmental management systems (EMS) is the primary goal of VEEP. DEQ does not prescribe the model or type of EMS or the structure of a facility's environmental program. However, DEQ is responsible for verifying that each facility accepted into VEEP meets the program criteria. Therefore, each E3 applicant is required to address several key points related to its EMS. Please provide documentation that shows that the following components are in place at your facility:

**Policy Statement.** Attach the facility's Policy Statement outlining its commitment to the environment. When reviewing each application, DEQ staff will look for an environmental policy statement that:

- Includes/stresses compliance, pollution prevention, training, communication & continuous improvement
- Addresses elements that are supported by EMS activities outlining the facility's commitment to the environment

**Identification of Environmental Impacts.** Describe the facility's process for identifying and evaluating its environmental impacts. At a minimum, include a list of the facility's most significant environmental impacts. When reviewing each application, DEQ staff will look for:

- Comprehensive list of impacts/aspects
- Method for determining significant impacts/aspects (e.g., a matrix)
- Impact/aspect review process outlined
- Scheduled review and reevaluation of impacts/aspects

**Setting Objectives and Targets.** Please include a list of the facility's goals (objectives) for reducing environmental impacts. Ideally, objectives will include numerical goals with projects designed to achieve these goals. The objectives should include targets or a schedule for completing tasks and/or achieving the stated objectives. When reviewing each application, DEQ staff will look for:

- Goals (or objectives) which address your significant impacts/aspects
- Tasks or projects planned for addressing each goal/objective with a targeted schedule for implementation

**Pollution Prevention.** In a typical EMS structure, objectives and targets may only address the impacts identified as the most "significant." For the pollution prevention section, please feel free to list any other environmental projects that are ongoing or planned. If possible, please include quantified reductions realized or expected, and any cost savings. When reviewing each application, DEQ staff will look for:

- A dedicated P2 section listing projects and accomplishments
- Reduction numbers and cost savings
- P2 activities outside of significant impacts/aspects

**Legal Requirements.** Each facility should have a mechanism for tracking changes in environmental compliance requirements. Provide a description of this function.

**Roles, Responsibilities and Authorities.** Each facility should have a system for defining, documenting and maintaining roles, responsibilities and authorities for its environmental management system. When reviewing each application, DEQ staff will look for:

- Assignments for projects, tasks or reporting responsibilities
- Upper management involvement or review

**Reporting & Record Keeping.** Each facility should have an effective system of documenting the status of environmental management system operations and activities.

**Training.** Each facility should have procedures for ensuring that *all* employees have the necessary training relative to their roles in the facility's EMS.

**Emergency Response Procedures.** Each facility should have effective procedures in place for responding to, reporting, mitigating and reviewing incidents. When reviewing each application, DEQ staff will look for:

- Evidence that the facility emergency management program is coordinated with local emergency response efforts.
- If an event were to take place, does the EMS have procedures in place to mitigate and reduce the likelihood of future events?

### **Monitoring, Investigative, and Corrective Actions for Noncompliance with EMS.**

The EMS should include provisions which address such events. When reviewing each application, DEQ staff will look for evidence that all such events are effectively addressed within the framework of the EMS and that the likelihood of "repeat offenses" has been significantly reduced or eliminated.

**Voluntary Self-Assessments.** Each facility should have a system that provides for either external or internal EMS auditing. DEQ reviewers will be looking for an indication of each auditing system and any certifications that might result.

**Communicating With and Informing External and Internal Audiences.** Each facility's EMS activities should be accessible to all employees and the general public. When reviewing applications, DEQ staff will be looking for:

- Easily accessible (e.g., web-based) EMS materials & communication
- Meetings with the public and staff regarding EMS/environmental efforts

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### **E3 Environmental Results & Commitments:**

Facilities are required to report annually on the results of their EMS and pollution prevention efforts (annual reports are due April 1<sup>st</sup> of each year). Establishing baseline data and tracking results is essential in order to evaluate the effectiveness of an EMS. A comprehensive EMS may address a wide array of environmental impacts including solid waste, water use, wastewater, energy usage, air impacts, etc.

The ability to measure and report progress is also critical to the administration and overall tracking of VEEP. Ideally, each participating facility will establish baselines and track progress on all of the environmental measures that are being addressed through their EMS. At a minimum, **E3 facilities are required to commit to track EMS results in at least two of the following categories (a list of specific subcategories or "indicators" for each of the categories is available on the VEEP website):**

- |                                      |  |   |
|--------------------------------------|--|---|
| <input type="checkbox"/> Solid waste | <input type="checkbox"/> Solid waste recycling | <input type="checkbox"/> Hazardous waste  |
| <input type="checkbox"/> Water use   | <input type="checkbox"/> Water discharges      | <input type="checkbox"/> Air emissions    |
| <input type="checkbox"/> Energy use  | <input type="checkbox"/> Land preservation     | <input type="checkbox"/> Land restoration |

In the annual report, facilities will be expected to provide a quantified baseline and results for the past year's efforts in each of these indicated categories. Facilities will also have the opportunity to provide reduction data in additional categories in the annual reporting process.

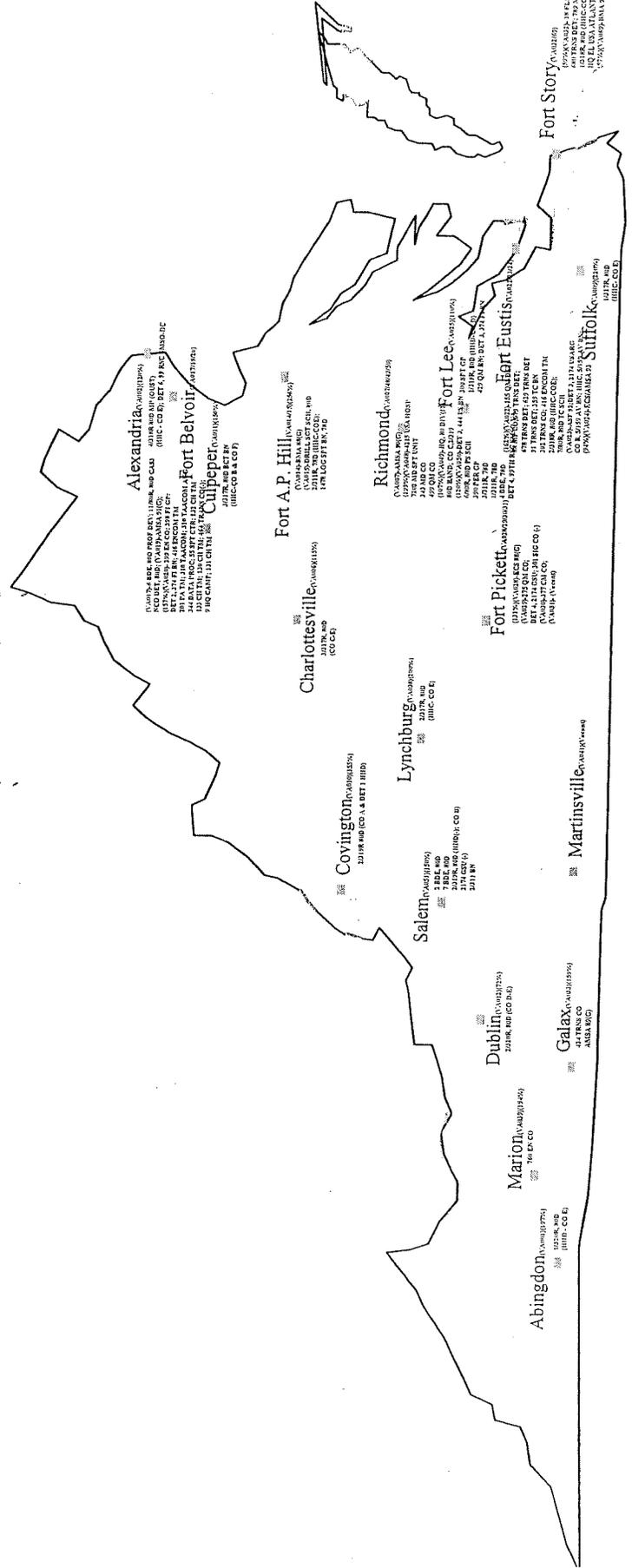
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### **E3 Environmental Compliance Requirements:**

E3 facilities must also have a record of significant compliance with environmental laws and be in significant compliance with all applicable environmental requirements. The scope of this screen and the screening criteria will be consistent with the compliance requirements established by the 2005 Virginia legislation related to VEEP. See the VEEP website for more information.

99th RRC VEEP Facilities

FAC ID	Name	Address	City	State	Zip	EPA ID
VA001	ABINGDON MEMORIAL USARC	571 WALDEN ROAD	ABINGDON	VA	24210-2207	VAR0000005660
VA002	MG ALBERT C LIEBER USARC	6901 TELEGRAPH ROAD	ALEXANDRIA	VA	22310-3320	VAR0000007229
VA006	TSG FRANK D PEREGORY USARC	1634 CHERRY AVENUE	CHARLOTTESVILLE	VA	22903-3704	VAR0000005678
VA009	1LT RICHARD T SHEA USARC	3502 BENNETT CREEK PARK ROAD	SUFFOLK	VA	23435-2375	VAR0000005587
VA010	PFC HARRY J FRIDLEY USARC	1617 SOUTH GREENLAWN AVE	COVINGTON	VA	24426-2340	VAR0000005686
VA011	CULPEPER MINUTEMEN MEM USARC	1821 INDUSTRY DRIVE	CULPEPER	VA	22701-4140	VAR0000002154
VA012	NEW RIVER VALLEY MEM USARC	5746 RESERVE WAY	DUBLIN	VA	24084-3524	VAR00000005652
VA033	PFC CURTIS B. SCHOOLEY USARC	125 ARMORY ROAD	GALAX	VA	24333-1919	VA2210000111
VA039	MG GUY B. DENIT USARC	4444 LEE HIGHWAY	MARION	VA	24354-9404	VA9210022910
VA048	1LT JIMMIEL. MONTEITH USARC	1741 E BELT BLVD	RICHMOND	VA	23224-4913	VAR0000005611
VA049	COL ERNEST H DERVISHIAN USARC	6700 STRATHMORE ROAD	RICHMOND	VA	23237-1127	VAR0000005595
VA050	RICHMOND AFRC	6002 STRATHMORE ROAD	RICHMOND	VA	23237-4916	VAR0000005603
VA051	PFC CLOYSE E HALL USARC	1915 BOULEVARD-ROANOKE	SALEM	VA	24153-6488	VAR0000002246





REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 99TH REGIONAL READINESS COMMAND  
99 SOLDIERS LANE  
CORAOPOLIS, PENNSYLVANIA 15108-2550

AFRC-CPA-E (200-1a2)

22 September 2004

MEMORANDUM FOR ALL PERSONNEL

SUBJECT: Environmental Policy

**PURPOSE:** The 99<sup>th</sup> Army Reserve Installation Management (ARIM) manages all real property facilities within the region which can have an impact on the environment. As a fundamental and integral component of our mission, activities, and functions, we will incorporate environmental stewardship into our day-to-day decision making and long-term planning process. Consequently, we will strive to continually improve our environmental management system which provides the framework for setting and reviewing our environmental objectives and targets.

**RESPONSIBILITY:** The Environmental Division is the proponent for environmental quality, but all Divisions integrate environmental considerations into their policies, operations, and planning. This applies to all personnel including military, civilians, and contractors working for or on behalf of the 99<sup>th</sup> ARIM. Everyone is responsible for sustaining the environment for a secure future.

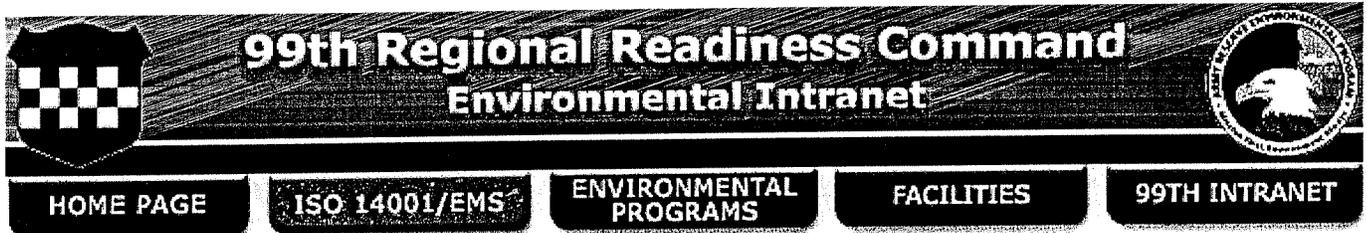
**COMMITMENTS:**

- Clean up environmental damage resulting from our past activities. We will reduce risks to human health and the environment caused by past operations. We will ensure open, unbiased, and comprehensive processes for cost-effective clean-up, protection of human health, and public well being.
- Meet environmental standards applicable to our operations. We will commit to comply with relevant environmental laws and regulations, and with other requirement to which we subscribe using an environmental compliance audit process emphasizing pollution prevention as a means to achieve full and sustained compliance.
- Plan our future activities to minimize environmental impacts and manage responsibly the irreplaceable natural and cultural resources under our stewardship. We will integrate the environmental consequences of proposed actions and alternatives into all levels of decision making, and we will conserve natural and cultural resources through effective training that encompasses environmental planning.
- Reduce or eliminate waste generation from our activities. We will strive to reduce waste creation. When source reduction is infeasible, we will reuse or recycle. The remaining waste, for which no pollution prevention alternative is feasible or cost-effective, we will effectively treat.

Our POC for this action is Ms. Darlene Stringos-Walker, 412-604-8167.

SIGNED

DAVID J. LUSARDI  
COL, GS, USAR  
Director  
Army Reserve Installation Management



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## Environmental Aspects

<b>Purpose</b>	<b>CONTROL OF DOCUMENTS Information</b>
To identify and document the environmental aspects of the 99th RRC's activities and processes in order to determine those which may have a significant impact on the environment. The 99th RRC does not produce any "products" due to the nature of the organization.	<b>Owner/Approver:</b> EMS Representative
<b>Definitions</b>	
<ul style="list-style-type: none"> <li>• <b>Environmental Aspect</b> – an element of an organization's activities, products and services that can interact with the environment (adopted from the ISO 14001 standard)</li> <li>• <b>Environmental Impact</b> – any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services (adopted from the ISO 14001 standard)</li> <li>• <b>Significant Environmental Aspect</b> - an environmental aspect that has or can have a significant environmental impact (adopted from the ISO 14001 standard)</li> </ul>	
<b>Procedure</b>	
<b>1. Identification of Activities, Products and Services</b>	
<p>1.1 The EMS Cross-Functional Team (CFT) identifies the RRC's current and past activities, products and services to establish a general framework for the identification and evaluation of environmental aspects and associated impacts. The output of this process is documented and communicated using the <u>Summary of Activities, Products and Services</u>.</p> <p>1.2 The activities, products and services identified by the RRC are intended to be 'large enough for meaningful examination and small enough to be sufficiently understood', as suggested in Clause 4.2.2 of the ISO 14004, <i>Environmental management systems -- General guidelines on principles, systems and supporting techniques</i>.</p> <p>1.3 The RRC considers those activities, products and services that the RRC can control and over which it can be expected to have an influence. The following three functional areas are considered when identifying activities, products and services:</p> <ul style="list-style-type: none"> <li>• <b>Mission Requirements</b> - those activities, operations, products and services that are integral to the accomplishment of the RRC's missions.</li> <li>• <b>Support Services &amp; Facilities Management</b> - those activities, products and services that support the mission of the RRC and/or are necessary to properly support the RRC/infrastructure</li> <li>• <b>Legacy Issues</b> - existing environmental issues that are a direct result of past operations</li> </ul>	

## Environmental Aspects

**2. Identification of Environmental Aspects** - Each of the RRC's activities, products and services are reviewed to identify associated environmental aspects. Below is a summary of the key steps of the aspect identification process:

2.1 Environmental aspects are identified through functional area meetings with appropriate personnel. These review meetings are scheduled and facilitated by the EMS Representative.

2.2 The environmental aspects identified for each activity, product and service are grouped into categories. Sample aspect categories include (AR 200-1, Sep 05):

- Air emissions (fugitive or from stacks), including particulate matter, combustion gases, volatile organic compounds (VOCs), hazardous air pollutants (HAPs).
- Generation of noise, vibration, odor, dust, heat, light, radiation, and other nuisance activities.
- Discharges and disposals (point and non-point), spills, or other releases to soil or ground and/or surface waters, including sewage, sediment, or solid, hazardous, and other wastes.
- Natural resource alteration (i.e., consumption or conservation), including water, timber, minerals, soil, etc.
- Ecological resource alteration, including wetland and endangered species protection or destruction.
- Cultural resource alteration, including historic properties; archeological sites; and properties of traditional cultural or religious importance to American Indians, Alaska Natives, and Native Hawaiians.
- Energy consumption or conservation, including electricity, fossil, and alternative fuels.

2.3 The output of the aspect identification process is documented using the Flowchart of Aspects Associated with Activities, Products and Services. Flowcharts depicting environmental aspects related to the RRC's current activities, products and services can be accessed by clicking on each of the entries identified in the Summary of Activities, Products and Services. Completed flowcharts are maintained as records, in accordance with the RECORDS management system element.

### 3. Evaluation of Environmental Aspects/Impacts

3.1 The environmental aspects identified for each functional area are summarized for the entire RRC using the Aspect Prioritization Worksheet.

3.2 Identified environmental aspects are evaluated for a variety of actual and potential environmental impacts using a risk-based assessment methodology presented in the Criteria for Evaluating the Significance of Aspects/Impacts guidance table.

3.3 Each potential impact associated with an environmental aspect is assigned a numerical risk rating. The individual impact risk ratings are entered into the environmental impact formula, which yields the Total Impact Risk Rating for each environmental impact.

### 4. Significance of Environmental Aspects/Impacts

4.1 A Total Impact Risk Rating of 100 has been determined to be an appropriate cut-off value to assign significance to environmental aspects. Impacts which yield a Total Impact Risk Rating greater than 100 are considered to be 'Significant'. Impacts which yield a Total Impact Risk Rating less than or equal to 100 are considered to be 'Not Significant'.

## Environmental Aspects

4.2 The CFT selected the Total Impact Risk Rating cut-off value of 100 after careful consideration of all of the identified aspects and impacts. The following factors were considered when selecting the Total Impact Risk Rating value: the nature and extent of the RRC's activities, products and services; the relative Total Impact Risk Rating of each identified environmental aspect; and the human and financial resources available to assist in the implementation of the environmental management system.

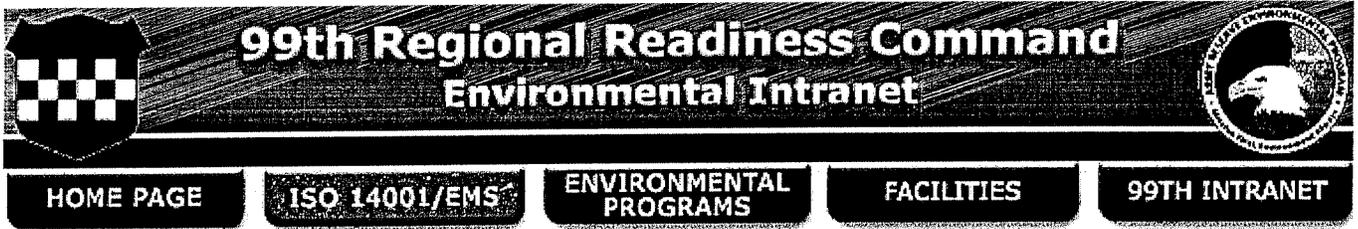
4.3 The CFT collectively considers its significant environmental impacts and identifies its significant environmental aspects (i.e., those aspects that have or may have a significant environmental impact). Significant environmental aspects are summarized on the Key Environmental Management System Parameters Table.

**5. Aspect Review and Update** - The results of this environmental aspect/impact evaluation are reviewed as part of the MANAGEMENT REVIEW process. Based on the results of the MANAGEMENT REVIEW, the review participants determine the need to update the Aspect Prioritization Worksheet and related documents.

### Document Revision History

Revision Date	Nature of Revision	Document Review Participants
14 Oct 05	Sample aspects categories updated	Pontier

Management System documents are maintained as described in the DOCUMENT CONTROL Procedure. Printed documents are controlled for 1 day after the Print Date at the bottom of each page.



**99th Regional Readiness Command**  
**Environmental Intranet**

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## Criteria for Evaluating the Significance of Aspects/Impacts

<b>Purpose</b>	<b>CONTROL OF DOCUMENTS Information</b>
<p>The table below summarizes the categories used to rate the significance of the RRC's aspects and the associated impact upon the environment. The table also describes the rationale used to determine the 'score' associated with the significance of aspects and impacts. The aspect/impact identification and evaluation process is performed as described in the ENVIRONMENTAL ASPECTS Core Element.</p> <p>Suggested approaches in the Army EMS Implementer's Guide were considered in developing this rating process.</p>	<p><b>Type:</b> Electronic Controlled Document <b>Owner/Approver:</b> EMS Rep. <b>Date of Latest Revision:</b></p>

<b>1. Mission Impact Severity:</b> Can mission be impacted as a result of the aspect/impact	
<b>High - 9</b>	Loss of ability to accomplish critical mission or near mission failure
<b>Med - 3</b>	Degraded mission capability or mission restrictions
<b>Low - 1</b>	Not applicable, no negative impact or insignificant or minor mission impacts or restrictions. Alternatives are available.
<b>2. Stakeholder Issues:</b> Stakeholders are defined as both the local community and the broader community beyond the immediate operating region	
<b>High - 9</b>	The impact is or could be of primary concern to stakeholders - repeated complaints or significant media coverage
<b>Med - 3</b>	The impact has been raised as an area of concern by stakeholders - occasional complaints or minor media coverage
<b>Low - 1</b>	The impact has not been raised as a concern, or complaints have been rare
<b>NA - 0</b>	Not applicable or <b>NO</b> negative impact
<b>3. Frequency or Likelihood:</b> The likelihood or probability of an aspect occurring	
<b>High - 9</b>	The environment is likely to be impacted on/with a frequency of once a month or greater (including continuously)
<b>Med - 3</b>	The environment is likely to be impacted on/with a frequency of less than once a month and greater than once a year
<b>Low - 1</b>	The environment is likely to be impacted on/with a frequency of less than once a year
<b>NA - 0</b>	Not applicable or <b>NO</b> negative impact
<b>4. Severity of occurrence:</b> The magnitude of the environmental impact	

Criteria for Evaluating the Significance of Aspects/Impacts

<b>High - 9</b>	Will cause significant environmental damage and sustained environmental impact (>1 yr) beyond the operational boundaries	
<b>Med - 3</b>	The environmental impact is significant but not sustained (<1 yr), or is sustained but affects a localized, relatively non-sensitive area	
<b>Low - 1</b>	The event is localized and impact is relatively minor and not sustained	
<b>NA - 0</b>	Not applicable or <b>NO</b> negative impact	
<b>5. Cost:</b> The costs being accrued over time as a result of managing the impact		
<b>High - 9</b>	Significant (>\$100,000 p.a.) on going costs for a decade or more beyond the life of the operation or high capital cost to rectify (> \$5 million)	
<b>Med - 3</b>	Significant cost through the life of the operations (but not beyond)	
<b>Low - 1</b>	Low to moderate cost not extending beyond the life of the operations	
<b>NA - 0</b>	Not applicable or <b>NO</b> negative impact	
<b>6. Regulatory Status:</b> Are there direct or indirect legislative or other requirements. Occurrence of environmental noncompliance or enforcement actions associated with this aspect during the past 12 months. What are the risks of noncompliance?		
<b>High - 9</b>	Regulated - noncompliance condition; actual or possible enforcement action or NOV. High risk of noncompliance.	
<b>Med - 3</b>	Regulated - in compliance. Some risk of noncompliance.	
<b>Low - 1</b>	Not applicable, no negative impact, no legislation or guidelines and no legal noncompliance events. Low risk of noncompliance.	
<b>Document Change History</b>		
<b>Revision Date</b>	<b>Nature of Revision</b>	<b>Document Review Participants</b>

Management System documents are maintained as described in the DOCUMENT CONTROL Procedure. Printed documents are controlled for 1 day after the Print Date at the bottom of each page.



## 99th RRC Environmental Aspect Prioritization Worksheet

Activity Product or Service	Environmental Aspect				Potential Environmental Impacts										Prioritization Scoring								
	Air Emissions	Waste Generation and Management	Releases to Water	Contamination of Land	Spills, Releases, Discharges	Consumption of Energy and Natural Resources	Waste Generation	Ambient Air Quality	Surface Water Quality	Ground Water Quality	Land Contamination	Landfill Consumption	Natural Resource Depletion	Noise	Personnel Impacted?	1. Mission Impact Severity	2. Stakeholder Issues	3. Frequency or Likelihood	4. Severity	5. Cost	6. Regulatory	Total Impact Risk Rating (sum 1-2) + (sum 3-6)	Significance (2)
<b>Administrative Activities</b>																							
<b>Headquarters</b>																							
Office and Administrative Activities	X				X		X									9	3	9	3	3	1	0	Not Significant
Classroom Training	X				X		X									9	1	3	1	3	1	192	Significant
Groundskeeping	X	X	X	X	X		X	X	X	X	X	X	X	X		3	3	3	3	3	1	80	Not Significant
Food Services	X	X	X	X	X		X	X	X	X	X	X	X	X		3	1	3	3	3	1	68	Not Significant
Janitorial Services	X	X	X	X	X		X	X	X	X	X	X	X	X		3	1	3	3	3	1	40	Not Significant
Medical Services	X	X	X	X	X		X	X	X	X	X	X	X	X		9	1	9	3	3	1	64	Not Significant
Parking	X			X	X		X	X								3	3	3	3	3	1	100	Not Significant
Security	X				X		X									3	3	9	3	3	1	84	Not Significant
Municipal Solid Waste Management	X	X			X		X	X	X							3	3	9	3	1	1	96	Not Significant
Construction/Demolition and Remodeling	X	X			X		X	X	X							3	3	9	3	3	3	108	Significant
Energy Use	X	X	X		X		X	X	X	X	X	X	X	X		3	9	9	3	3	9	288	Significant
Real Property Management	X				X		X	X	X	X	X	X	X	X		9	3	9	3	3	1	192	Significant
Recycling - Collection and Processing	X	X			X		X	X	X	X	X	X	X	X		9	9	9	9	3	9	540	Significant
<b>Typical Reserve Center USARC/AFRC</b>																							
Asbestos Management	X	X	X	X	X		X	X	X	X	X	X	X	X		9	9	9	9	3	9	0	Not Significant
Lead Based Paint Management	X	X	X	X	X		X	X	X	X	X	X	X	X		9	3	3	3	3	3	144	Significant
Radon Management	X	X	X	X	X		X	X	X	X	X	X	X	X		3	3	3	1	1	1	36	Not Significant
PCB Management	X	X	X	X	X		X	X	X	X	X	X	X	X		3	3	3	3	1	3	60	Not Significant
HVAC Management	X	X	X	X	X		X	X	X	X	X	X	X	X		3	3	3	1	1	1	30	Not Significant
Boilers	X	X	X	X	X		X	X	X	X	X	X	X	X		3	3	3	1	3	1	42	Not Significant
Oil/Water Separator Management	X	X	X	X	X		X	X	X	X	X	X	X	X		3	3	3	3	3	3	72	Not Significant
Stormwater Management	X	X	X	X	X		X	X	X	X	X	X	X	X		3	3	3	1	1	3	48	Not Significant
Wastewater Management	X	X	X	X	X		X	X	X	X	X	X	X	X		9	9	3	1	1	3	144	Significant
Septic System Management	X	X	X	X	X		X	X	X	X	X	X	X	X		9	3	3	1	1	3	96	Not Significant
Drinking Water Management	X	X	X	X	X		X	X	X	X	X	X	X	X		9	3	3	1	1	1	72	Not Significant
Erosion Management	X	X	X	X	X		X	X	X	X	X	X	X	X		3	3	3	1	3	1	48	Not Significant
Pesticide Storage, Handling and Use	X	X	X	X	X		X	X	X	X	X	X	X	X		3	3	3	1	1	1	36	Not Significant
Transformer Management	X	X	X	X	X		X	X	X	X	X	X	X	X		3	1	1	1	1	1	12	Not Significant
Weapon Cleaning, Storage	X	X	X	X	X		X	X	X	X	X	X	X	X		9	1	3	1	1	1	50	Not Significant
UST/AST Management	X	X	X	X	X		X	X	X	X	X	X	X	X		3	3	1	1	1	3	36	Not Significant

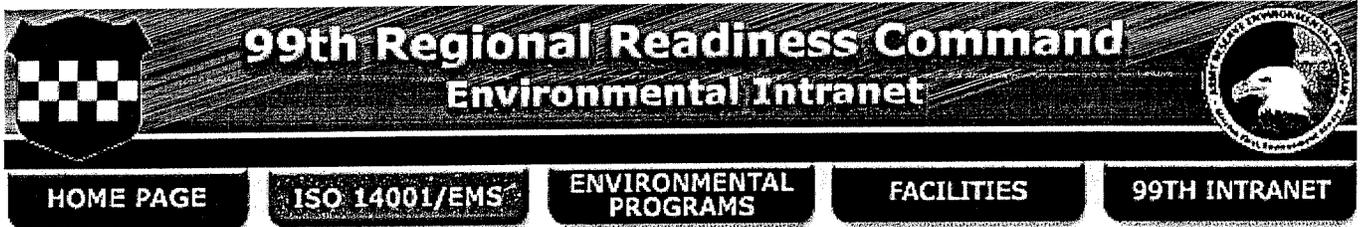
99th RRC Environmental Aspect Prioritization Worksheet

Activity Product or Service	Air Emissions	Waste Generation and Management	Releases to Water	Contamination of Land	Spills, Releases, Discharges	Consumption of Energy and Natural Resources	Waste Generation	Ambient Air Quality	Surface Water Quality	Ground Water Quality	Land Contamination	Landfill Consumption	Natural Resource Depletion	Noise	Personnel Impacted?	1. Mission Impact Severity	2 Stakeholder Issues	3. Frequency Likelihood	4. Severity	5. Cost	6. Regulatory	Total Impact Risk Rating (sum 1+2)*	Significance (2)
Typical Reserve Center USARC/AFRC																							
Fuel Management	X	X	X	X	X	X	X	X	X	X	X	X	X	X		9	3	1	3	1	9	168	Significant
Food Preparation	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	1	1	1	1	1	12	Not Significant
Cultural Resource Management						X							X			9	3	1	3	3	3	120	Significant
Natural Resource Management	X	X	X	X	X	X		X								9	3	1	3	3	3	120	Significant
Fire Suppression		X	X	X	X	X		X								3	1	1	3	3	3	40	Not Significant
OMS																							
POL Storage	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	3	3	3	3	3	72	Not Significant
Waste POL Storage and Transfer	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	3	3	3	3	3	108	Significant
Fluid Topping	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	3	3	3	3	3	60	Not Significant
Vehicle Washing	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	3	3	3	3	3	60	Not Significant
Hazardous Waste Accumulation and Puncturing and Draining Aerosol Cans	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	3	3	9	9	9	180	Significant
Spill Plan Management	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	1	1	1	3	3	16	Not Significant
Emergency Plan Management	X	X	X	X	X	X	X	X	X	X	X	X	X	X		9	3	3	9	3	3	120	Significant
																9	3	3	9	3	9	92	Not Significant
AMSA																							
Change Fluids	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	1	1	3	1	3	32	Not Significant
Battery Change	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	1	1	3	1	3	32	Not Significant
Tire Change	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	1	1	3	1	3	24	Not Significant
Filter Change	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	1	1	3	1	3	32	Not Significant
Painting Operations	X	X	X	X	X	X	X	X	X	X	X	X	X	X		1	1	1	3	3	3	20	Not Significant
Parts Washing Systems	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	1	1	3	3	3	40	Not Significant
Machine Shop Operations	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	1	1	3	3	3	40	Not Significant
Scrap Metal, Pallet Management	X	X	X	X	X	X	X	X	X	X	X	X	X	X		1	1	1	1	1	1	16	Not Significant
ECS																							
Humidity Controlled Storage	X	X	X	X	X	X	X	X	X	X	X	X	X	X		3	3	1	1	1	1	24	Not Significant
Storage and Distribution of Equipment and Supplies	X	X	X	X	X	X	X	X	X	X	X	X	X	X		9	3	1	1	1	1	48	Not Significant

**99th RRC Environmental Aspect Prioritization Worksheet**

Activity Product or Service	Air Emissions	Waste Generation and Management	Releases to Water	Contamination of Land	Spills, Releases, Discharges	Consumption of Energy and Natural Resources	Waste Generation	Ambient Air Quality	Surface Water Quality	Ground Water Quality	Land Contamination	Landfill Consumption	Natural Resource Depletion	Noise	Personnel Impacted?	1. Mission Impact Severity	2. Stakeholder Issues	3. Frequency or Likelihood	4. Severity	5. Cost	6. Regulatory	Total Impact Risk Rating (Sum 1+2+3+4+5+6)	Significance (2)		
Training Areas																									
Erosion Control Activities																									
Bivouac																									
Range Maintenance																									
Range Exercise Training																									
Other Facilities																									
Rock Crusher Activities																									
Aviation Maintenance																									
Water Craft Maintenance																									
Tenant Activities																									
Lease Activities																									
Contractor Activities																									

Nature of Revision	Names of document / review participants	Date
	Darlene Stringos-Walker	###



**Key Links:** [EQCC Info](#) | [News & Publications](#) | [Forms](#)

## Objectives, Targets and Action Plans

<b>Purpose</b>	<b>CONTROL OF DOCUMENTS Information</b>
<p>To establish and maintain objectives and targets at relevant levels within RRC -- thus, enabling them to properly plan the implementation of the management system to ensure that established objectives and targets are met.</p> <p>Well-developed objectives and targets provide a framework of clearly defined and action-oriented goals that result in minimizing the potential liability associated with significant environmental impacts of RRC's activities, products and services. Targets are assigned to each objective and establish measurable performance criteria used to evaluate whether or not the organization is achieving its objectives.</p>	<p><b>Owner/Approver:</b> EMS Representative</p>
<b>Definitions</b>	
<ul style="list-style-type: none"> <li>• <b>Environmental objective</b> – overall environmental goal, arising from the environmental policy, that an organization sets itself to achieve, and which is quantified where practicable (adopted from the ISO 14001 standard)</li> <li>• <b>Environmental target</b> – detailed performance requirement, quantified when practicable, applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives (adopted from the ISO 14001 standard)</li> </ul>	
<b>Procedure</b>	
<b>1. Establishing Objectives and Targets</b>	
<p>1.1 The Environmental Management Representative and the EQCC establish annual objectives and targets designed to sufficiently set the overall direction or end goal of the management system. The <a href="#">Key Environmental Management System Parameters Table</a> is used to document and summarize the organization's objectives and targets.</p> <p>1.2 The following elements are considered while establishing objectives and targets:</p> <ul style="list-style-type: none"> <li>• Environmental Policy</li> <li>• Legal and other requirements</li> <li>• Significant environmental aspects</li> <li>• Technological options and limitations</li> <li>• Financial, operational and mission requirements</li> <li>• Stakeholder views (includes employees and other interested parties)</li> </ul>	

## OBJECTIVES, TARGETS AND ACTION PLANS

### 2. Achieving Objectives and Targets

2.1 The Cross Functional Team develops a Management System Action Plan ([view the blank Action Plan](#)) for each established objective and target, which is approved by the EQCC. The Action Plans identify action items, responsible personnel, schedules and resources necessary to achieve the associated objective and target. Completed Action Plans can be accessed from the [Key Environmental Management System Parameters Table](#).

2.2 The RRC's status with respect to established objectives and targets is tracked as described in the [PERFORMANCE MEASUREMENT AND MONITORING](#) management system element. Action plans are revised, as needed, based on the results of performance tracking activities. The EQCC must approve modifications to the Action Plans.

#### Document Change History

Revision Date	Nature of Revision	Document Review Participants

Management System documents are maintained as described in the [DOCUMENT CONTROL](#) Procedure. Printed documents are controlled for 1 day after the Print Date at the bottom of each page.

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## Key EMS Parameters

<b>Purpose</b>	<b>Document Control Information</b>
<p>This table provides a summary-level overview of key environmental management system parameters for each calendar year. Performance indicators are based on the Installation Status Report (ISR)</p> <p>Qualitative Non-Scored Standards:  <b>Green</b>=Completed/ <b>Amber</b>= 50-99 %Complete/ <b>Red</b>=0-49% Complete</p>	<p><b>Owner/Approver:</b> EMS Program Manager</p>

### 2005: Key EMS Parameters

Significant Environmental Aspects and Impacts	Objectives, Targets and Action Plans	Operational Control Procedures	Performance Indicator
<p><b>Real Property Management</b></p> <p><b>Aspect:</b> Management, acquisition, and disposal of real property</p> <p><b>Impact:</b></p> <ul style="list-style-type: none"> <li>Potential for human health impact from contact with hazardous substances such as, PCBs, Asbestos, Radon, Lead containing compounds</li> <li>Potential for damage or misuse of cultural and natural resources</li> </ul>	<ul style="list-style-type: none"> <li>Real Property Management Action Plan</li> </ul>	<ul style="list-style-type: none"> <li>Natural Resources</li> <li>Cultural Resources</li> <li>Real Property Management Plan</li> <li>NEPA</li> <li>PCBs</li> <li>Asbestos</li> <li>Radon</li> <li>Lead</li> </ul>	<b>Red</b>
<p><b>Asbestos Management</b></p> <p><b>Aspect:</b> Exposure, generation, disposal, management of asbestos-containing materials and waste</p> <p><b>Impact:</b></p> <ul style="list-style-type: none"> <li>Human health impacts from air-borne exposure</li> <li>Disposal of asbestos in landfill</li> <li>Wastewater generation of ACM abatement activities</li> <li>Potential liability for mismanagement</li> </ul>	<ul style="list-style-type: none"> <li>Asbestos Management Action Plan</li> </ul>	<ul style="list-style-type: none"> <li>Asbestos Management</li> </ul>	<b>Amber</b>

## Key Environmental Management System Parameters

<p><b>Waste Management</b></p> <p><b>Aspect:</b> Waste Generation and Management - including hazardous, residual, universal, medical, municipal</p> <p><b>Impact:</b></p> <ul style="list-style-type: none"> <li>• Human health impacts from contact with waste</li> <li>• Off-site treatment, disposal, future liability of hazardous waste disposal</li> <li>• Disposal of waste in landfill creating long term liability issues</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Waste Management Action Plan</u></li> <li>• Training</li> </ul>	<ul style="list-style-type: none"> <li>• Integrated Waste Management Plan</li> <li>• Pollution Prevention Plan</li> </ul>	<p>Amber</p>
<p><b>Spill Response</b></p> <p><b>Aspect:</b> Potential for spills, leaks and releases of hazardous materials and wastes</p> <p><b>Impacts:</b></p> <ul style="list-style-type: none"> <li>• Human health impacts from contact</li> <li>• Contamination of land and water</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Spill Response Action Plan</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Spill &amp; Emergency Response</u></li> </ul>	<p>Amber</p>

**DOCUMENT CHANGE HISTORY:**

Revision Date	Nature of Revision	Document Review Participants
March 7 2005		John Pontier
24 May 2005	Added 2 Action Plans	John Pontier
22 Sept 2005	Added 1 Action Plan	Michelle Brown

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## Management System Action Plan Asbestos Management

<b>Purpose</b>	<b>CONTROL OF DOCUMENTS Information</b>
The following tables are used to document management system objectives and targets and to track the organization's performance compared to established goals/performance indicators. The <a href="#">Key Environmental Management System Parameters</a> lists all of the Management System Plans.	<b>Type:</b> Record <b>Completed by:</b> Pontier <b>Date of Completion:</b> 23 May 2005

<b>Objective</b>	Implement Asbestos Inspection and Management Plans. Consult Asbestos Inspections and Management Plans before doing renovation and demolition, and include appropriate clauses in contracts.
<b>Target</b>	Develop a procedure to ensure Asbestos Management Plans are followed by end of FY06.
<b>Performance Indicator(s)</b>	Installation Status Report (ISR) Qualitative Non-Scored Standards will be used for Performance Indicators:  <b>Green</b> = Completed <b>Amber</b> = 50 - 99 Percent Complete <b>Red</b> = 0 - 49 Percent Complete
<b>Statement of Performance</b>	Current Status: <b>Amber</b>  Statement of Performance: Asbestos Inspections and Management Plans exist for most 99th RRC facilities. We need to update some based on the most recent asbestos inspections. We plan to inspect the facilities that haven't been inspected yet.

**Criteria for Establishing Objectives and Targets:**

<b>Environmental Policy</b>	<ul style="list-style-type: none"> <li>• <u>POLICY</u></li> </ul>
<b>Applicable Legal and</b>	<ol style="list-style-type: none"> <li>1. Asbestos Hazard Emergency Response Act</li> <li>2. Clean Air Act</li> <li>3. Toxic Substances Control Act</li> <li>4. State specific Asbestos Regulations</li> <li>5. AR 200-1, Environmental Protection &amp; Enhancement</li> <li>6. DA PAM 200-1, Environmental Protection &amp; Enhancement</li> </ol>

## Asbestos Management System Action Plan

<b>Applicable Regulations and Other Requirements</b>	<ol style="list-style-type: none"> <li>7. AR 200-4, Cultural Resource Management</li> <li>8. DA PAM 200-4, Cultural Resource Management</li> <li>9. AR 140-483, Army Reserve Land and Facilities Management</li> <li>10. AR 405-45, Real Property Inventory Management</li> <li>11. AR 405-70, Utilization of Real Property</li> <li>12. AR 405-90, Disposal of Real Estate</li> </ol>
<b>Related Significant Environmental Aspects</b>	<ol style="list-style-type: none"> <li>1. Potential presence of Asbestos from <u>Real Property Management</u> activities.</li> <li>2. Particulate matter emissions from disturbed ACM in conjunction with <u>Buildings/Grounds Maintenance</u> and <u>Construction/Demolition</u> activities.</li> <li>3. Disposal of ACM waste associated with <u>Buildings/Grounds Maintenance</u> and <u>Construction/Demolition</u> activities.</li> <li>4. Waste water generation from asbestos abatement activities in conjunction with <u>Buildings/Grounds Maintenance</u> and <u>Construction/Demolition</u> activities.</li> </ol>
<b>Technological Options</b>	<ul style="list-style-type: none"> <li>• Acquire asbestos free facilities and building materials when possible</li> </ul>
<b>Financial, Operational and Business Considerations</b>	<ul style="list-style-type: none"> <li>• Asbestos inspections, assessments and management plans, control of asbestos through in-place management or abatement, asbestos removal or abatement as part of routine repair or construction projects and asbestos removal and waste disposal as part of building renovation and demolition are eligible for facility funds.</li> <li>• Employee training, and disposal of friable asbestos when separate from renovation and demolition and if considered a RCRA hazardous waste by the State are eligible for environmental funds.</li> </ul>
<b>Stakeholder Views</b>	<ol style="list-style-type: none"> <li>1. Regulatory NOVs</li> <li>2. Industrial Hygiene issues for personnel as a result of disturbed ACM</li> <li>3. Loss of trained Soldiers due to health issues related to asbestos exposure</li> <li>4. Loss of facility usage due to asbestos abatement activities</li> </ol>

### Action Plan

ACTION ITEM	PRIORITY/ SCHEDULE	RESPONSIBLE JOB/PERSONNEL	PEOPLE RESOURCES NEEDED	FINANCIAL RESOURCES NEEDED	STATUS
Scan & post existing asbestos inspections	FY06	EPS	Pontier Spriggs	None	<b>Red</b>
Complete asbestos inspections for all facilities	FY06	EPS	Hrzic	\$428,524	<b>Amber</b>
Post EnviroFact, Greening the 99th RRC through Asbestos Management	16 May 05	EPS	Pontier	None	<b>Green</b>
Write & Post Asbestos Management Plan	3 Jun 05	EPS	Pontier	None	<b>Green</b>
Implement Asbestos Management Plan including training	FY06	EPS FOS	Pontier Mayes Kish Clutter Croyle & Co.	None	<b>Red</b>
Update Asbestos Management	3 Jun 05	EPS	Pontier	None	<b>Green</b>

## Asbestos Management System Action Plan

procedures for conformance	3 Jun 05	EFS	Pontier	None	Green
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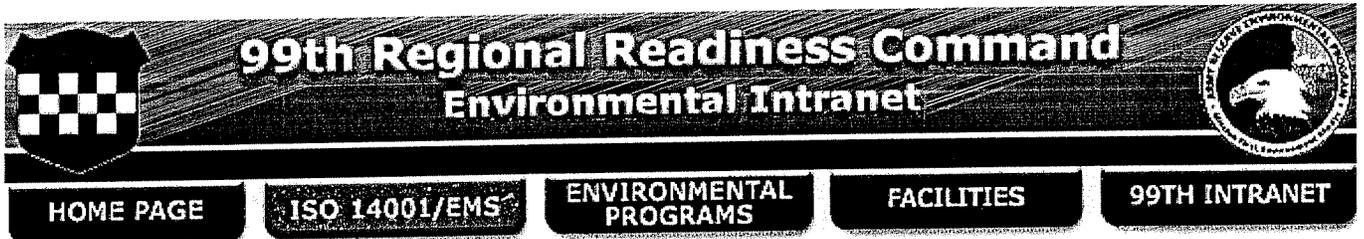
### Performance Tracking

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Total
<b>Plan/Goal</b>	Amber	Green											
<b>Actual</b>	Amber	Amber	Amber	Amber	Amber								

### Document Revision History (applicable to the control and revision of the plan)

Revision Date	Nature of Revision	Document Review Participants
23 May 05	Initial Review; updated & posted EnviroFact	Pontier
3 Jun05	Updated status; wrote & posted Asbestos Management Plan	Pontier
7 Oct 05	Reviewed and updated status for FY06	Pontier
16 Dec 05	Began asbestos inspections	Pontier

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## Management System Action Plan Waste Management

<b>Purpose</b>	<b>CONTROL OF DOCUMENTS Information</b>
The following tables are used to document management system objectives and targets and to track the organization's performance compared to established goals/performance indicators. The <a href="#">Key Environmental Management System Parameters Table</a> lists all of the Management System Plans.	<b>Type:</b> Record <b>Completed by:</b> Michelle Brown <b>Date of Completion:</b> 23 Sept 2005

<b>Objective</b>	Implement an Integrated Waste Management Program in order to reduce quantities of waste generated throughout the Command and to ensure that those wastes that can not be eliminated are properly handled
<b>Target</b>	Have 100% accountability for the disposition of all wastes generated.
<b>Performance Indicator(s)</b>	Installation Status Report (ISR) Qualitative Non-Scored Standards will be used for Performance Indicators:  <b>Green</b> = Completed <b>Amber</b> = 50 - 99 Percent Complete <b>Red</b> = 0 - 49 Percent Complete
<b>Statement of Performance</b>	Current Status: <b>AMBER</b>  <b>Statement of Performance:</b> The 99th RRC ARIM does not have data on the amount of wastes disposed or recyclables diverted at our facilities. We have provided no guidance on the correct disposal of waste.

**Criteria for Establishing Objectives and Targets:**

Environmental Policy	POLICY
Applicable Legal and Other Requirements	<ol style="list-style-type: none"> <li>1. Resource Conservation and Recovery Act (RCRA)</li> <li>2. State and municipal specific waste regulations</li> <li>3. AR 420-49, Utility Services</li> <li>4. DA PAM 420-47, Solid Waste Management</li> <li>5. AR 200-1, Environmental Protection &amp; Enhancement</li> <li>6. AR 40-5, Preventive Medicine</li> </ol>
	<ol style="list-style-type: none"> <li>1. Ground water or surface water contamination from potential release of</li> </ol>

Waste Management Action Plan

Related Significant Environmental Aspects	hazardous/universal waste 2. Generation of hazardous waste, including: paint-related material, spent solvents, etc.
Technological Options	Web-based tracking system
Financial, Operational and Business Considerations	Responsibility for waste management falls across various divisions in the ARIM, and into other staff sections. As a result, funding for different kinds of waste management is restricted along those same property lines; this makes a centralized program a challenge. Hazardous waste management is the responsibility of the Environmental Division; solid waste management is the responsibility of the Operations Division; medical waste management is the responsibility of the Surgeon's Office; radioactive waste is the responsibility of the Safety Office.
Stakeholder Views	1. Regulatory Notice of Violation 2. Liability as a Potentially Responsible Party in a RCRA action 3. Negative DoD perception.

**Action Plan**

ACTION ITEM	PRIORITY/SCHEDULE	RESPONSIBLE JOB/PERSONNEL	PEOPLE RESOURCES NEEDED	FINANCIAL RESOURCES NEEDED	STATUS
Quantify the amount of solid waste disposed and amount of recyclables diverted (or divertible) from regulated facilities, and report to local authorities as required	June 2006	P2 Program Mgr	150 man-hours	Estimated \$180K	<b>Red</b>
Distribute form for FMS/ES to report all hazardous, non-hazardous, and universal waste disposal or recycling actions completed on IMPAC	Sept 2005	P2 Program Mgr	2 man-hours	None	<b>Green</b>
Record all waste disposal/recycling actions completed via IMPAC	Oct 2005	FMS ES	30 man-hours	None	<b>Amber</b>
Get all RSO Environmental Specialists on-line to use UBANGS for DRMO waste turn-ins	Nov 2005	ES G6	24 man-hours	None	<b>Amber</b>
Staff and finalize 99th RRC Qualified Recycling Plan	Dec 2005	P2 Program Mgr	30 man-hours	None	<b>Amber</b>
Create and implement an Integrated Waste Management Plan	Oct 2006	P2 Program Mgr FMS ES OPS Staff	100 man-hours	None expected	<b>Red</b>
Update Integrated Waste Management Plan biannually, or when needed	Oct 2008	P2 Program Mgr FMS ES OPS Staff	5 man-hours	None expected	<b>Red</b>

**Performance Tracking**

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	1
Plan/Goal	Amber												

Waste Management Action Plan

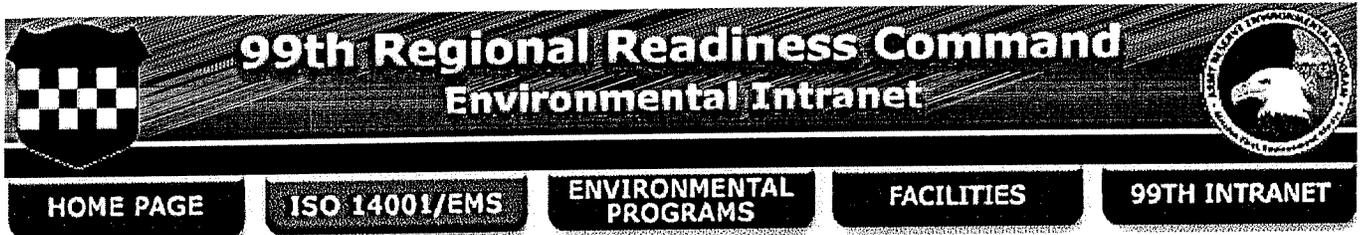
Plan/Goal	Amber											
Actual	Amber	Amber	Amber	Amber	Amber							

**Document Revision History**

Revision Date	Nature of Revision	Document Review Participants
9/23/05	Initial Posting	M Brown, J Pontier
9/29/05	Update	M Brown

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## Management System Action Plan Spill Response

**Purpose**

The following tables are used to document management system objectives and targets and to track the organization's performance compared to established goals/performance indicators. The Key Environmental Management System Parameters lists all of the Management System Plans.

**CONTROL OF DOCUMENTS Information**

**Type:** Record  
**Completed by:** Pontier  
**Date of Completion:** 24 May 2005

**Objective**

Implement spill response plans at all facilities that need a spill plan

**Target**

By the end of FY06, implement spill response plans at all facilities that need a spill plan  
 Installation Status Report (ISR) Qualitative Non-Scored Standards will be used for Performance Indicators:

**Performance Indicator(s)**

- Green** = Completed
- Amber** = 50 - 99 Percent Complete
- Red** = 0 - 49 Percent Complete

Current Status: **Amber**

**Statement of Performance**

Statement of Performance: We wrote SPCC Plans for six of the seven facilities that need one. These six SPCC Plans are due their five-year review. We wrote a generic Regional Spill Contingency Plan (RSCP) for facilities having potential for spills that could cause environmental damage. We have not documented which facilities need a RSCP and which facilities don't. We wrote a Preparedness, Prevention and Contingency (PPC) Plan template for those facilities storing waste oil in Pennsylvania. Not all of these facilities have used it. We wrote a Spill SOP for field training.

**Criteria for Establishing Objectives and Targets:**

**Environmental Policy**

- POLICY

1. 40 CFR 112 requires facilities subject to the rule to prepare and implement a SPCC Plan to prevent the discharge of oil into or upon navigable waters of the United States or adjoining shorelines
2. PA Code 298 requires generators who store waste oil to develop PPC plans for addressing spills and other emergencies involving waste oil

## Spill Management System Action Plan

<b>Applicable Legal and Other Requirements</b>	<ol style="list-style-type: none"> <li>3. 33 CFR 155 requires an oil spill response plan for certain vessels</li> <li>4. AR 200-1 Environmental Protection and Enhancement requires facilities that store, handle or transfer petroleum, oil and lubricants (POL), hazardous materials (HAZMAT) or hazardous waste having potential for environmental damage to prepare and implement a spill contingency plan</li> <li>5. DA PAM 200-1 Environmental Protection and Enhancement</li> <li>6. SPCC Plans, a RSCP, a PPC Plan Template and a 99th RRC Spill SOP apply to facilities and activities having the potential for spills</li> </ol>
<b>Related Significant Environmental Aspects</b>	<ol style="list-style-type: none"> <li>1. Potential spills, leaks, and releases of fuel to storm water or ground water from Fueling activities</li> <li>2. Generation and disposal of contaminated materials from clean-up of spills from Equipment Operation, Maintenance &amp; Storage activities, Fueling activities, Hazardous and Universal Waste - Accumulation, Storage and Disposal activities, and Hazardous Material Storage &amp; Use activities</li> </ol>
<b>Technological Options</b>	<ul style="list-style-type: none"> <li>• Electronic Tracking System</li> </ul>
<b>Financial, Operational and Business Considerations</b>	<ul style="list-style-type: none"> <li>• The <i>Financial Resources Needed</i> in the <i>Action Plan</i> below are funded projects</li> <li>• Environmental costs are documented and validated through the EPR</li> </ul>
<b>Stakeholder Views</b>	<ul style="list-style-type: none"> <li>• Spills can result in regulatory, community, and landowner issues</li> </ul>

### Action Plan

ACTION ITEM	PRIORITY/ SCHEDULE	RESPONSIBLE JOB/PERSONNEL	PEOPLE RESOURCES NEEDED	FINANCIAL RESOURCES NEEDED	STATUS
Post RSCP Plan and PPC Plan Template	16 May 05	EPS	Pontier	None	<b>Green</b>
Post EnviroFact, Greening the 99th RRC through Spill Prevention Planning	16 May 05	EPS	Pontier	None	<b>Green</b>
Update SPCC Plans	FY05/06	EPS	Pontier	\$23,000	<b>Amber</b>
Update RSCP Plan	3 Nov 05	ESP	Pontier	None	<b>Green</b>
Write Fleet Oil Spill Response Plans	10 Jan 06	EPS	Pontier	\$11,000	<b>Green</b>
Implement RSCP Plan, SPCC Plans and PPC Plans at all appropriate facilities including training	FY06	EPS FOS	Kish Clutter Poloka	None	<b>Red</b>
Update Spill & Emergency Response procedure	FY06	EPS	Pontier	None	<b>Amber</b>

### Performance Tracking

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Total
<b>Plan/Goal</b>	Amber	<b>Green</b>											
<b>Actual</b>	Amber	Amber	Amber	Amber	Amber								

### Document Revision History (applicable to the control and revision of the plan)

Revision Date	Nature of Revision	Document Review Participants
24 May 05	First draft	Pontier

## Spill Management System Action Plan

21 May 05	Procedure	Owner
25 May 05	Initial review comments incorporated	Pontier, Brown, Eastburn
27 Jun 05	Updated status; started SPCC Plan updates	Pontier
11 Jul 05	Update status; started FOSRP	Pontier
7 Oct 05	Reviewed and updated for FY06	Pontier
10 Jan 06	Completed FOSRP and training	Pontier

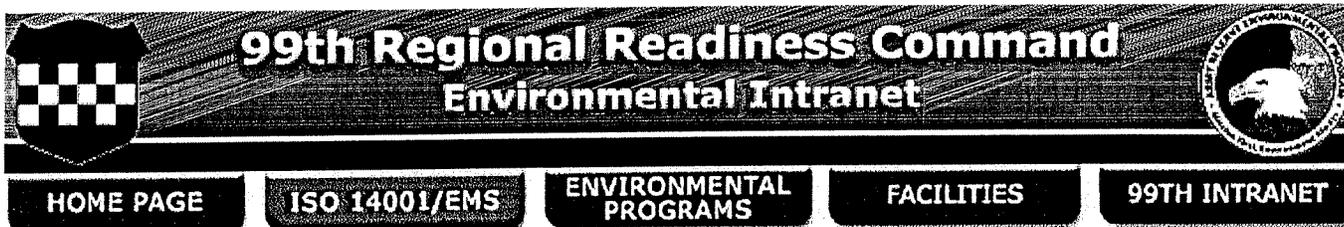
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## Management Review

### Purpose

To document the process for top management's formal review of the Environmental management system. The management review process is designed to ensure the continued suitability, adequacy and effectiveness of the RRC's management system.

### CONTROL OF DOCUMENTS Information

**Owner/Approver:** EMS Representative

### Definitions

- None currently defined

### Procedure

1. Top management routinely performs informal reviews of the management system as part of the day-to-day management process. Formal Management Reviews are performed at the frequency determined by top management, based on changing RRC conditions and circumstances. At a minimum, top management conducts a formal review of the management system at least once per year.

2. The Management System Representative schedules and leads formal management review meetings. Top Management participate in the management review process.

3. The following information, at a minimum, is reviewed and evaluated by top management during each management review meeting:

- Suitability and adequacy of the EMS Scope
- Need for changes to the Environmental Policy and Objectives and Targets
- Results of EMS Audits and Compliance Evaluations
- Communications from Interested Parties, including complaints
- Environmental Performance of the Organization
- The extent to which Objectives and Targets have been met
- Status of Corrective and Preventive Actions
- Changing circumstances related to its Environmental Aspects and Legal Requirements
- Recommendations for improvement

4. Management review meeting minutes are recorded and maintained in accordance with the RECORDS management system element. At a minimum, management review meeting minutes will identify:

- Date of meeting
- Participants
- Agenda and key issues discussed
- Action items, including responsibility assignments and schedules, arising out of the meeting

## MANAGEMENT REVIEW

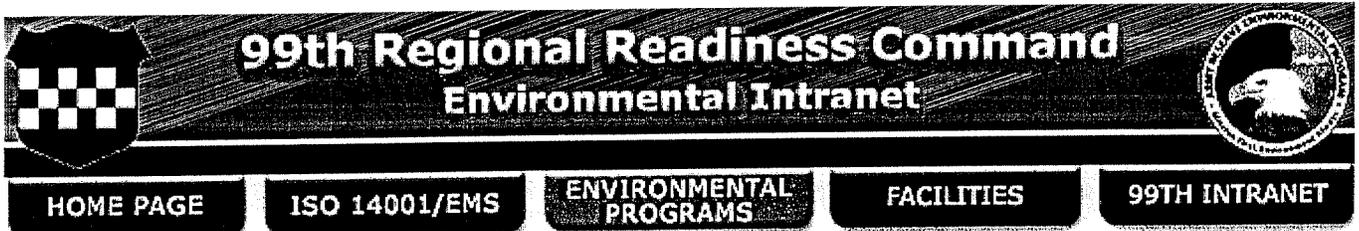
### Document Change History

Revision Date	Nature of Revision	Document Review Participants

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The banner features a checkered shield on the left, the text "99th Regional Readiness Command Environmental Intranet" in the center, and a circular seal with an eagle on the right. Below the banner are five navigation buttons: "HOME PAGE", "ISO 14001/EMS", "ENVIRONMENTAL PROGRAMS", "FACILITIES", and "99TH INTRANET".

**Key Links:** [EQCC Info](#) | [News & Publications](#) | [Forms](#)

## Pollution Prevention

Program Manager  
Michelle Brown

### Reduce, Reuse, Recycle

What is P2?

Pollution Prevention (P2) is striving to accomplish our mission without having a negative impact on human health or the environment. How, you may ask, do we accomplish our mission without negatively affecting our health or the environment? The three "R"s: REDUCE, REUSE, RECYCLE.

#### REDUCE

We can minimize the negative impacts of our actions by reducing the hazards of the chemicals that we work with, by reducing the amount of waste that we generate, by reducing the amount of waste that we dispose, and by reducing the amount of pollution that we release into the environment.

Reducing these things has many benefits including reduced costs for material procurement (when you use less, it costs less), reduced regulatory requirements (when you don't use it, you aren't regulated for it's use), and reduced disposal costs (if you don't use it, you don't have to dispose of it). Of course, we can't reduce all of the materials we use to zero, and still accomplish the mission.

#### REUSE

In cases where we can't reduce what we use, we can reuse what we use. Reuse is when you use something, and then use it again (for the same purpose or for a completely different purpose). For instance, many vehicle maintenance shops use "dry sweep" absorbent to soak up spills of oil on the shop floor. Rather than use the dry sweep once and dispose of it, it can be reused until it will no longer absorb oil. This means the same "dry sweep" can be used four or five times, before it is disposed. Reuse cuts down on material procurement costs and waste disposal costs.

#### RECYCLE

Of course, most materials can only be reused so many times before they've outlived their usefulness. When this happens, we can recycle them. Recycling is when you alter an item so that it can be used for something other than it's original intended purpose. A common example is an aluminum soda can, when you've finished with the drink, the aluminum can be melted and re-formed into something else. It might be used to make an aluminum tire rim, or another aluminum can.

If all else fails, and a material cannot be reduced, reused, or recycled, we must dispose of it properly. This is a

last resort. Proper disposal means not just throwing it on the ground. For non-hazardous waste, it means ensuring it is put in a trash can and sent to a landfill or other licensed solid waste disposal facility. For hazardous waste, it means ensuring that it is properly stored, spills are prevented, and it is disposed at a licensed treatment, storage, and disposal facility (TSDF).

**Plans and Permits**

- [Pollution Prevention Plan](#)

**Policy Statements/Procedures**

- [Sustainable Management of Waste in Military Construction, Renovation and Demolition Activities, 6 Feb 06](#)

**Forms, Checklists and Records**

- 

**Training Materials**

- 

**Supporting Links**

- [Closed Loop Oil Program Information](#)
- [Find an MSDS](#)
- [Extend a HazMat Expiration Date](#)
- [AR 200-1 Environmental Protection and Enhancement](#)
- [DA PAM 200-1 Environmental Protection and Enhancement](#)

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The following oils are available through the Closed Loop Oil Program

**The following oils are available through the Closed Loop Oil Program:**

<i>NSN</i>	<i>Viscosity</i>	<i>Unit of Issue</i>
9150-01-438-5875	10W-30	BX (12 QT)
9150-01-438-5882	10W-30	5 GL
9150-01-438-5891	10W-30	55 GL
9150-01-438-5933	10W-30	PER GL
9150-01-438-6076	15W-40	1 QT
9150-01-438-6082	15W-40	5 GL
9150-01-438-6079	15W-40	55 GL
9150-01-438-6084	15W-40	PER GL
9150-01-460-7526	30	1 QT
9150-01-460-7536	30	5 GL
9150-01-460-7518	30	55 GL
9150-01-460-7897	30	PER GL
9150-01-460-7956	40	55 GL
9150-01-460-7965	40	PER GL
9150-01-496-1959	10	1 QT
9150-01-496-1948	10	5 GL
9150-01-496-1943	10	55 GL
9150-01-496-1966	10	PER GL

**Here's how the program works:**

1. Order the oil through the normal requisitioning process. \*Be sure to use the Stock Numbers listed above\*.
2. Use the oil.
3. When you have used/waste oil that is ready for disposal, call the Safety-Kleen headquarters at 800-525-5739 or visit the Safety-Kleen website ([www.safety-kleen.com](http://www.safety-kleen.com)) to get the phone number of the local Safety-Kleen office. Contact the local office to schedule the pick-up. Safety-Kleen will come and pick up your used/waste oil at no cost. They will pick up 110% of the oil that you have ordered for the entire year - so if you order 55 gallons over the course of the year, they will pick up 60 gallons for free.
4. After your oil pickup, send an email or fax to Michelle Brown (phone 804-233-6473; fax 804-233-2181) with the amount of oil picked up and the date of pick-up.

\*Be aware that they do not typically remove the oil drum\*. If they offer to take the drum, be sure to verify that there will be no charge for the disposal.

\*There may be restrictions on what your local Safety-Kleen office will allow you to mix with your used/waste oil. Contact the local office for more information.\*

If you are NOT ordering the Closed Loop Oil, disposal is not FREE; PLEASE DO NOT CALL

The following oils are available through the Closed Loop Oil Program

SAFETY-KLEEN TO PICK UP YOUR USED/WASTE OIL UNLESS YOU HAVE  
COORDINATED WITH YOUR REGIONAL ENVIRONMENTAL SPECIALIST OR FACILITY  
OPERATIONS SPECIALIST!!

More information is available at: [DLA Closed Loop Motor Oil Program](#)

Problems with the program should be reported to [Michelle Brown](#).