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ENVIRONMENTAL GUIDANCE HANDBOOK

This is an UNCONTROLLED DOCUMENT printed for reference only. The controlled document is on-line on the Fort Campbell Internet under Directorate of Public Works, Environmental Division.

<https://home.army.mil/campbell/index.php/about/Garrison/dpw/environmental/eo-handbook>

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## Chapter 1 Introduction

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This Environmental Guidance Handbook prescribes responsibilities, policies, and instructions for managing environmental issues at Fort Campbell, KY, required by applicable federal, state (TN & KY), local laws, regulations and Army Regulation (AR) 200-1, Environmental Protection and Enhancement, and CAM Reg. 200-1.

Many Soldiers and leaders feel environmental issues are a side bar, something extra that has to be done that will inhibit or restrict the mission. It is quite the opposite. If we do not take into consideration the health and welfare of our troops, our mission will suffer. These instructions are designed to enhance and support the warfighter and make their mission more easily accomplished and still protect and preserve our natural resources for generations to come.

## Chapter 2 Purpose and Scope

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This Handbook supports Fort Campbell Environmental programs. It applies to the following:

- All organizations, activities and contractors located on Fort Campbell.
- Any outside organization or activity training at Fort Campbell.

### I. Reviews and Revisions

The Fort Campbell Environmental Division will review this Handbook annually. All Environmental Quality Officers (EQOs), as well as any other Fort Campbell personnel directly involved in Environmental issues, are encouraged to provide comments and suggestions to improve this Handbook. Submit comments to the Environmental Education Program Manager.

### II. Applicable Regulations

- State Regulations
  - Ft. Campbell is regulated by both the states of Kentucky and Tennessee hazardous waste programs.
- Federal Regulations
  - In order to comply with the Federal Facilities Quality Act, Fort Campbell must manage its waste in accordance with (IAW) the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments (HSWA). Federal waste management regulations are codified in Title 40 of the Code of Federal Regulations (CFR). This handbook provides instructions for complying with the following parts of 40 CFR:
    - Part 240 through Part 259 for the regulation of solid waste
    - Part 260 through Part 272 for the regulation of hazardous waste
    - Part 273 for the regulation of universal waste
    - Part 279 for the regulation of used oil
    - Fort Campbell must also comply with the following:
      - Defense Transportation Regulations which incorporate by reference 49 CFR Parts 170 through 177 regarding hazardous materials transportation
      - 29 CFR Part 1910 regarding employee safety

- Military Regulations
  - Fort Campbell personnel must comply with AR 200-1, Environmental Protection and Enhancement, and CAM Reg. 200-1, Fort Campbell's Environmental Strategy Regulation.

### III. Responsibilities

The following responsibilities are organized according to the Ft. Campbell command structure. Commanders will appoint EQOs IAW CAM Reg. 200-1.

- Environmental Division
  - The Environmental Division will:
    - Coordinate, inspect, or manage all aspects of installation actions relative to environmental regulations.
    - Serve as the single point of contact for federal, state, and local agencies with regard to environmental permits, interpretation of regulatory requirements, coordination and resolution of non quality issues or findings.
    - Monitor installation compliance with federal, state, and local environmental requirements, including activities of tenants, and recommend to the Garrison Commander necessary or advisable changes in policies to improve program management.
    - Coordinate the analysis of waste to determine if it is hazardous and provide copies of waste analysis prior to release to DLA Disposition Services-Campbell (formerly DRMO).
    - Immediately advise the Garrison Commander of the receipt of enforcement notices of violation, consent orders, or quality agreements.
  
- Commanders / Facility Managers
  - Implementation of the best management practices outlined this handbook requires the support of unit commanders and facility managers. Specifically, commanders and facility managers should:
    - Assign personnel to key positions outlined in this Handbook.
    - Enforce regulatory requirements and best management practices and procedures.
    - Utilize the Environmental Quality Officer (EQO) as the central point of contact for coordination and resolution of environmental issues.

- Environmental Quality Officer (EQO)

The EQO will:

- Function as a liaison on all environmental issues between the unit and the Environmental Division.
- EQO will be trained in accordance with CAM Regulation 200-1 (Appendix D).
- Implement the instructions established by this Handbook and enforce compliance.
- Oversee the activities of the Satellite Accumulation Point Operator, POL/Used Antifreeze Accumulation Point Operator and HAZMAT custodian.
- Conduct environmental inspections of activity or unit areas. Ensure weekly inspections of POL/Used Antifreeze Accumulation Points and Satellite Accumulation Points are completed and documented.
- Implement spill procedures when necessary.
- Notify the Environmental Division of changes to operations, including waste stream process changes, new waste streams, materials used, and materials stored.
- Ensure that appropriate unit personnel receive the proper level of environmental training (e.g., POL Accumulation Point Operator, SAP Operator, HAZMAT custodian, Spill Planning & Prevention, Defense HAZMAT Training, etc.).
- Brigade EQOs ensure each BN has an EQO appointed on orders and trained (see CAM Reg. 200-1).

- Satellite Accumulation Point Operator

The Satellite Accumulation Point (SAP) Operator will:

- Attend initial and annual Satellite Accumulation Point Operator training.
- Coordinate with the environmental division to establish and maintain the SAP
- Operate the Satellite Accumulation Point in accordance with this handbook.
- Conduct weekly inspections, document deficiencies and corrective actions, and enforce compliance.
- Coordinate with the EQO to resolve noncompliance issues.
- Maintain required documentation in the SAP Six Part Folder.
- Implement spill procedures when necessary.

- POL/Used Antifreeze Accumulation Point Operator

The POL/Used Antifreeze Accumulation Point Operator will:

- Attend Oil Handler Personnel training, if accumulating used oil in quantities 55 gallons or greater.
- Coordinate with the Environmental Division to establish and maintain the POL Accumulation Point.
- Operate the POL accumulation point in accordance with this handbook.
- Conduct weekly inspections, document deficiencies and corrective actions, and enforce compliance.
- Maintain required documentation in the POL Accumulation Point folder.
- Coordinate with the EQO to resolve noncompliance issues.
- Implement spill procedures when necessary.

- HAZMAT Custodian

Units may designate a HAZMAT custodian to maintain materials contained and HAZMAT Storage units/lockers. These personnel receive procedural training from the unit EQO or PPOC HAZMAT delivery personnel.

The HAZMAT custodian will:

- Coordinate with the EQO and PPOC delivery personnel to maintain established HAZMAT inventories.
- Maintain the MSDS/SDS binder.
- Ensure containers placed in the HAZMAT return locker are labeled with their contents.
- Follow the procedures outlined this handbook.
- Establishing a HAZMAT locker, see the (Environmental Protocol Sheet (page A-46) labeled “HAZMAT Locker- Establish.”)

## Chapter 3 Environmental Waste Made Easy - Environmental Protocol Sheets

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All Fort Campbell facilities generate waste, whether it is residue from the use of products or products themselves that are no longer useable for their intended purpose. Proper waste management can be very difficult, especially if you don't do it every day. For example, the procedures for handling asbestos are much different than those for managing waste paint thinner. Many items exist that require mandatory recycling, or recycling as a best management practice (BMP).

In order to simplify the recycling/waste management process, specific work instructions for wastes commonly generated at Fort Campbell have been developed in the form of Environmental Protocol Sheets (EPSs). The EPSs are easy to follow, laying out step-by-step how to manage each waste stream. These EPSs can be found in Appendix A and are accessible using the Fort Campbell Environmental Division link <https://home.army.mil/campbell/index.php/about/Garrison/dpw/environmental/eqo-handbook>.

To use the EPSs, turn to Appendix A and find the "Environmental Protocol Sheet Index". Find the particular waste or issue you are looking for and turn to that sheet. The handling procedures are self-explanatory. If you cannot find your waste or environmental issue in the index, contact the Environmental Division for guidance.

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**NOTE: EPS information underlined in bold (e.g., "Range Control", indicates point of contact telephone number and location are listed under" IMPORTANT PHONE NUMBERS/ADDRESSES" at the back of this Handbook.**

**NOTE: If you want an EPS that is not in Appendix A, you may request one by calling the Environmental Division, Education Program**

## Chapter 4 Managing Hazardous Materials

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Hazardous materials, hazardous chemicals, hazardous substances, hazardous waste, toxic chemicals, dangerous goods, etc. – these identifying names all refer to hazardous materials and will be collectively referred to as HAZMAT in this section. Many commodities received, stored, and issued by installations possess unique characteristics requiring specialized care and handling. No other single group of commodities requires the degree of specialized handling mandated by public laws and regulations as the group broadly described as HAZMAT.

Failure to properly identify, store, and handle such material poses serious health risks for personnel. It can result in death, injury, or long-term chronic physical disability of personnel and property or environmental damage. It is imperative that the hazards associated with the storage and handling of these materials is understood by all personnel required to physically handle them.

## Chapter 5 Hazardous Materials Control Center (HMCC) / Pollution Prevention Operations Center (PPOC)

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Fort Campbell operates a centralized Hazardous Materials Control Center also known as the Pollution Prevention Operations Center (PPOC). The purpose of this program is to enhance combat readiness, establish regulatory compliance and inventory management procedures for all hazardous materials used during industrial work processes on Fort Campbell. The instructions in this document are mandatory for all units and activities that are customers of the HMCC/PPOC on Fort Campbell, Kentucky.

Nearly all activities on Fort Campbell use HAZMAT, which are essentially those items requiring a Material Safety Data Sheet (MSDS) or Safety Data Sheet (SDS). The EQO for the facility is responsible for properly maintaining HAZMAT to minimize safety hazards, prevent spills, and reduce hazardous waste generation. MSDS/SDS are initially provided to units when the HAZMAT locker is set up, and if new product is introduced to the locker, an MSDS/SDS is provided. **It is the unit's responsibility to maintain the MSDS/SDS book.**

All units/activities that store Hazardous Materials are required to establish a Hazardous Communication (HAZCOM) Program. AR 385-10 section 16-2 requires all civilian and military personnel of the Department of Defense to comply with the Hazard Communications Standard, 29 CFR 1910-1200. CAM Reg. 385-6 and the Installation Safety Office (ISO) establish the Ft. Campbell program.

The Environmental Division programs have a very close interface and support of the Hazcom program. Units and activities should contact Installation Safety Office for more information. All individuals must be informed of any physical and health hazards that they may be subjected to in the performance of their duties. Hazcom training must be given annually, when new personnel are assigned to the unit, and when a new hazardous material is introduced into the workplace. See also 29 CFR 1910.1200 for more detailed information.

To establish a HAZMAT locker, see the Environmental Protocol Sheets (page A-46) labeled "HAZMAT Locker- Establish."

The following supply procedures will be utilized to replenish materials for units and activities that have been formally inducted into the PPOC/HMCC operation:

- 1) All classes of supplies must now be requisitioned and paid for up front through the Army Supply System/GCSS-Army including any hazardous materials. This includes all HAZMAT required to build pre-positioned UBL/Contingency packages for training exercises, JRTC, real-world deployments, etc. The two packages consist of one 15 DOS CLIII (P) package and one 5 DOS CLIX Battery package which vary in contents depending on the unit's size and their equipment/vehicles.
- 2) All classes of supply are delivered to the ordering unit's respective Brigade Tactical Supply Support Activity (SSA). PPOC Staff are on DA1687 authority to pick up all HAZMAT items from the SSA. This includes any CLII, III, IV, and IX hazardous materials. Once the items are picked up they are brought to the PPOC for data entry into the EESOH-MIS HAZMAT tracking database. Fort Campbell has an annual EPA requirement to submit annual EPCRA reports that annotate HAZMAT usage on Fort Campbell. All HAZMAT brought onto the Installation must be captured in the EESOH-MIS database to ensure accurate reporting.



- 3) Once at the PPOC HAZMAT products are either delivered to the 7 DOS Shop-Stock (HAZMAT lockers) located at the unit motor pool or hangar maintenance area or they are stored on the shelf at the 15 DOS Bench-Stock Warehouse (PPOC) until they are needed at the shop location. If the items were ordered to replenish UBL/Contingency (CLIII (P) or CLIX Batteries) stocks, then those items will go to their respective warehouses at the PPOC.
- 4) PPOC Staff will assist each unit by providing the BMO/PLL Clerk with HAZMAT order sheets including NSNs/unit of issue/quantities needed to replenish stocks at the Bench-Stock Warehouse.
- 5) PPOC drivers deliver new HAZMAT products to the motor pools/hangars and remove any empty containers and used product for proper disposal. See the Environmental Protocol Sheets (A-46, 47, 48) for additional guidance.
- 6) Commanders/directors should ensure that all HAZMAT materials utilized in support of maintenance functions are obtained through the PPOC/HMCC.
- 7) Unit/activities shall not use their Government Purchase Credit Card (GPC) to purchase HAZMAT Supplies without proper approval from the DPW Environmental Division Pollution Prevention Branch located at BLDG 5134, 2<sup>nd</sup> St & Wickham Ave (270-798-9769).

## **Chapter 6 Managing Hazardous Waste/Satellite Accumulation Points (SAP)**

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This chapter describes how to manage wastes generated at Fort Campbell facilities, including hazardous waste (HW), universal waste (UW), non-hazardous industrial waste (NHIW), special waste, and general refuse. The following topics are covered:

- Generating and Accumulating Waste
- Satellite Accumulation Points
- How to establish a SAP
- How to close a SAP
- How to move a SAP

### **Generating and Accumulating Waste**

Many activities/facilities at Fort Campbell generate hazardous and universal wastes. These wastes must be accumulated temporarily at the generating facility in accumulation points or turned in to the PPOC immediately upon generation. Call PPOC Hazardous Waste Pick-Up at 270-798-9790 to coordinate removal of waste from the accumulation point.

## **HW Satellite Accumulation Points**

Facilities may accumulate as much as 55 gallons of HW or one quart of acutely HW (for example Blanchfield Army Community Hospital) in containers *at or near* the point of generation where wastes initially accumulate. This area is commonly referred to as a HW Satellite Accumulation Point (SAP). The SAP **must** be under the control of the operator of the process generating the waste. "Under control" means that the person generating the waste controls what waste is put in the container ensuring no cross-contamination with other wastes. Each container in a SAP must be kept closed except when adding or removing contents. The containers must be in good condition and labeled.

***NOTE: Because the definition of a SAP is somewhat subjective, the Environmental Division Hazardous Waste Program will determine where a SAP may be located. Do not establish SAPs without Environmental Division approval.***

The purpose of a SAP is to allow you some relief from having to immediately take waste to the PPOC. Regulators closely inspect SAPs, so special care should be taken in managing them. The generator of the HW must be able to show a regulator that the waste is managed from cradle to grave. To do this we use a Six-Part Folder. Forms used to open, close or recertify a SAP can be found in Appendix E

**Note: A building diagram depicting the location of the SAP is required to establish or recertify a SAP.**

## **How to Establish a SAP**

When it is determined that hazardous waste is being generated:

1. All hazardous and universal waste sites are regulated by the EPA and the state. Any unit/activity generating hazardous waste will contact the Environmental Division for approval of on-site accumulation.
2. To establish an SAP, see the appropriate protocol sheet for the waste identified, or call Environmental Division Hazardous Waste if unsure.
3. Submit a SAP establishment memorandum signed by the Commander/Facility Manager and EQO, and a site diagram showing the location of the SAP, to the Environmental Division Pollution Prevention Branch located at BLDG 5134, 2<sup>nd</sup> St and Wickham Ave (270-798-9786/9773/9762).

**Note: Forms used to open, close or recertify a "Satellite Accumulation Point" can be found in Appendix E**

4. When the SAP is approved, the Environmental Division will assist the primary individual in constructing a Six-Part Folder. The Six-Part Folder is a tool to manage the hazardous/universal waste from cradle-to-grave to include records of inspection, training, and turn-in of the hazardous/universal waste. *Note: Centralized accumulation points (e.g., Troop Self Help, AAFES Warehouse, BACH, and Fort Campbell Schools Warehouse) maintain a SAP for fluorescent tubes and mercury containing lamps. Units and tenant activities are not required to establish a SAP for spent lamps and should refer to the EPS for "Fluorescent Tubes and Mercury Containing Lamps" on page A-31.*

5. The Environmental Division will provide annual SAP training to the unit/activity on the Hazardous Waste Resource Conservation and Recovery Act (RCRA) ensuring proper management of the SAP to maintain environmental compliance. Initial and annual SAP training is required for anyone who performs duties involving hazardous waste management personnel training or inspection of hazardous waste sites. EQO training provides SAP training that is good for only one year from the date of initial training.

## **How to Close a SAP**

### **Military units**

If a unit has a Satellite Accumulation Point and all assets are deployed, close the Satellite Accumulation Point (SAP).

1. Submit a SAP closure memo signed by the Commander and EQO to the Environmental Division Pollution Prevention Branch located at BLDG 5134, 2<sup>nd</sup> St and Wickham Ave (270-798-9786/9773/9762).
2. Call to set up an appointment to turn in hazardous waste to the 90-Day Yard located at BLDG 5132, 2<sup>nd</sup> St and Wickham Ave (270-798-9790).
3. Place a copy of the SAP closure memo on the outside of the CBRNE (NBC) room door.
4. Keep the SAP Poster, Six-Part Folder, and the empty accumulation containers for use when the unit returns to Fort Campbell.

### **Tenant units and activities**

If hazardous waste is no longer being accumulated, close the Satellite Accumulation Point (SAP).

1. Submit a SAP closure memo signed by the Commander/ Facility Manager and EQO to the Environmental Division Pollution Prevention Branch located at BLDG 5134, 2<sup>nd</sup> St and Wickham Ave (270-798-9786/9773/9762).
2. Call to set up an appointment to turn in hazardous waste to the 90-Day Yard located at BLDG 5132, 2<sup>nd</sup> St and Wickham Ave (270-798-9790).
3. Coordinate with the Environmental Division for further guidance.

## **How to Move a SAP**

1. Submit a SAP closure memo signed by the Commander/ Facility Manager and EQO to the Environmental Division Pollution Prevention Branch located at BLDG 5134, 2<sup>nd</sup> St and Wickham Ave (798-9786/9773/9762).
2. Call to set up an appointment to turn in hazardous waste to the 90-Day Yard located at BLDG 5132, 2<sup>nd</sup> St and Wickham Ave (270-798-9790).
3. Transfer the SAP Poster, Six-Part Folder, and the empty accumulation containers for use at the new site.
4. Submit a SAP establishment memo for the new site, signed by the Commander/Facility Manager and EQO to the Environmental Division, with a site diagram depicting the SAP location.
5. When the SAP is approved, file the new approval letter in the Six-Part Folder and resume hazardous waste accumulation.

## Chapter 7 POL Management

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This chapter describes how to establish and manage "Used POL and Used Antifreeze Accumulation Points" established throughout the facility. The most common location for a Used POL and Used Antifreeze Accumulation Point is a motor pool or aviation hangar. These sites are subject to state and federal environmental compliance inspections. Contact the unit/activity EQO or DPW Environmental Hazardous Waste for assistance. The following topics are covered:

- How to establish a Used Oil and/or Used Antifreeze Accumulation Point
- How to close a Used Oil and/or Used Antifreeze Accumulation Point
- How to move a Used Oil and/or Used Antifreeze Accumulation Point

### I. How to Establish a Used Oil and/or Used Antifreeze Accumulation Point:

**Note: Refer to the "Antifreeze" and/or "Oil (Used)" protocol sheet and call Environmental Division Hazardous Waste Section for assistance.**

To establish a Used POL and/or Used Antifreeze Accumulation Point:

- Submit a memo signed by the Commander/ Facility Manager and EQO requesting establishment to the Environmental Division Pollution Prevention Branch located at BLDG 5134, 2<sup>nd</sup> St & Wickham Ave (270-798-9786/9773/9762). Also, provide a site diagram depicting the location of the accumulation point.
- Maintain a documentation folder with the establishment memo and diagram, training documentation, and inspection sheets (weekly and monthly). Records of Oil Handling Personnel training must be maintained for 3 years.

**Note: Forms used to open or close a "Used Oil and/or Used Antifreeze Accumulation Point" can be found in Appendix E**

**Note: Initial and annual Oil Handling Personnel training is required for bulk quantities greater than or equal to 55 gallons. For more information, please contact the Environmental Division Spill Response/Storage Tank Program (270-798-9637 or 270-798-9601).**

### II. How to Close a Used Oil and/or Used Antifreeze Accumulation Point:

1. If all vehicles and generators are deployed and there is no need to accumulate POL products, close the accumulation point.
2. Submit a closure memo signed by the Commander/ Facility Manager and EQO to the Environmental Division Pollution Prevention Branch located at BLDG 5134, 2<sup>nd</sup> St & Wickham Ave (270-798-9786/9773/9762).
3. Call 270-798-9790 to schedule a time to have the Used Oil pumped out of the accumulation drum(s).
4. Call 270-798-9790 to schedule a time to have Used Antifreeze removed from the site. The entire full drum(s) of Used Antifreeze will be removed and an empty replacement will be left in its place.
5. Secure Secondary Containment Units (SCU) until the unit returns to Fort Campbell or coordinate turn-in to the PPOC. Serviceable SCUs – PPOC Services (270-798-9791). Unserviceable SCUs - DLA Disposition Services-Campbell (270-798-9519).

### **III. How to Move a Used Oil and/or Used Antifreeze Accumulation Point:**

1. Submit a POL accumulation point closure memo signed by the Commander/ Facility Manager and EQO to the Environmental Division Pollution Prevention Branch located at BLDG 5134, 2<sup>nd</sup> St & Wickham Ave (270-798-9786/9773/9762).
2. Coordinate to turn in used oil/used antifreeze to the 90-Day Yard located at BLDG 5132, 2<sup>nd</sup> St & Wickham Ave. Call 270-798-9790 for Used Oil. Call 270-798-9790 for used antifreeze.
3. Keep the “Used Oil and/or Used Antifreeze Accumulation Point” poster, documentation folder, and empty accumulation containers for use at the new accumulation point.
4. Complete an establishment memo for the new site, signed by the Commander/ Facility Manager and EQO to the Environmental Division Pollution Prevention Branch located at BLDG 5134, 2<sup>nd</sup> St & Wickham Ave (270-798-9786/9773/9762). Also provide a new site diagram depicting the accumulation point location.
5. File the establishment memo and diagram in the documentation folder and resume POL accumulation.

### **IV. Training, Inspections and Recordkeeping Requirements:**

Refer to Chapter 7 for training, inspections and recordkeeping requirements.

### **V. Used POL and/or Used Antifreeze Accumulation Point Management:**

Refer to Appendix A for the "Antifreeze" and/or “Oil (Used)” environmental protocol sheet. Used POL and Used Antifreeze Accumulation Points must be inspected weekly by the unit/activity.

## **Chapter 8 Training, Inspections and Recordkeeping**

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This chapter gives information, instructions, and forms for required training, periodic internal inspections, and recordkeeping.

### **I. EQO Appointment/Training**

CAM Reg. 200-1 Installation Environmental Strategy Plan (see Appendix D) outlines the requirements and required training for EQOs. EQOs are required to be appointed on orders and trained within 4 months after appointment as an EQO. Training is available through the Environmental Division, Education Program (270-798-9769 or 270-798-9595).

### **II. Unit Training**

The Environmental Division Education Program is available to conduct site-specific training to units for Safety Stand down days, OPD, NCOBP, etc. Command Safety and Fire Programs overlap with environmental issues, and can be combined with environmental training.

### III. Satellite Accumulation Point Operator - Initial and Refresher Training

Satellite Accumulation Point Operators will complete a block of instruction on hazardous waste, universal waste, used batteries and POL management. SAP Operators are also required to complete annual refresher training. This training is available by calling the **Environmental Division, Hazardous Waste Program (270-798-9786/9773/9762)**.

#### Oil Handling Personnel Training

Oil Handling Personnel (OHP) training is regulatorily required for any installation personnel including garrison activities, units, tenants, tenant organizations, and contracted operations that are responsible for the transfer, transport, or handling of Petroleum, Oil, and Lubricant (POL) products in bulk quantities **greater than or equal to 55 gallons**. This training is conducted annually and is coordinated through the Spill Response/Storage Tank Program. New Oil Handling Personnel (OHP) must contact the Spill Response/Storage Tank Program for next available training date. Records must be maintained for three years as required by regulation 40 CFR 112. For more information or training dates, please contact **Environmental Division Spill Response/Storage Tank Program (270-798-9637 or 270-798-9601)**.

### IV. Spill Awareness Training (Non-Oil Handling Personnel Training)

Spill awareness training is a best management practice for any installation personnel that may be responsible for the transfer, transport, or handling of POL products in quantities less than 55 gallons. This training provides awareness of the proper procedures for reporting, responding, and preventing POL discharges by becoming familiar with the **Spill Awareness Training and Resource Guide** and the **Spill Prevention Response and Notification Procedure (SPRNP) Sign**. For more information, please contact **Environmental Division Spill Response/Storage Tank Program (270-798-9637 or 270-798-9601)**.

### V. Inspections

Environmental Division program personnel conduct various inspections within their programs. The Inspector General's Office also conducts periodic Command Inspection Program (CIP) assessments. The CIP checklist is located in Appendix C of this handbook.

### VI. Satellite Accumulation Points (SAP)

Satellite Accumulation Points must be inspected by qualified unit/activity personnel on a weekly basis. The Environmental Division will conduct periodic compliance inspections. Inspection documentation will be retained by the unit/activity for three years. Contact the unit/activity EQO or **Hazardous Waste** for inspection checklists.

### VII. POL Accumulation Points

POL Accumulation Points must be inspected by qualified unit/activity personnel on a weekly basis. The Environmental Division will conduct periodic compliance inspections. Inspection documentation will be retained by the unit/activity for three years. Contact the unit/activity EQO or **Hazardous Waste** for inspection checklists.

## VIII. Recordkeeping

**Oil Handling Personnel Training** – Original Oil Handling Personnel (OHP) Training records are maintained by the Spill Response/Storage Tank Program. Personnel must sign in the OHP section of the **Spill Awareness Training and Resource Guide** and maintain these records until closure of the applicable area or until three years after the training date. Forms used to open or close a POL accumulation point can be found in Appendix E

**Spill Awareness Personnel Training** – As a best management practice, personnel must sign the Spill Awareness Training section of the **Spill Awareness Training and Resource Guide**. These records will be maintained until closure of the applicable area or until three years after the training date.

## IX. HAZCOM Training

Command Safety has oversight of the HAZCOM training program. This training must be documented including the content of the training, date of training and who attended. CAM Reg. 385-6 states that this training will be conducted annually.

## Chapter 9 Forest Management (270)798-2616

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The Army's Forest management activities are highly visible to the general public. Significant payback in terms of mission support and public relations are elements that a well-planned, integrated and scientifically managed forest program can yield. Army policy provides for sustained yield timber management tailored to military mission requirements as the first priority. Additional benefits of an ecologically sound forest management program include protection of watersheds, cultural resources, and endangered species; recreational opportunities; improved wildlife populations and habitat; and natural beauty.

During training, only scrub tree limbs will be used for camouflage (i.e. sumac foliage, eastern red cedar and pine). Commercial hardwood trees will not be used. Trees will not be cut or damaged without prior approval from DPW Forestry Branch. *It is recommended that camouflage netting and associated systems be used to enhance the natural surroundings and not cut or destroy the trees which will perhaps reveal tactical positions more easily.*

To support the forest management effort at Fort Campbell, units should report all forest and grass fires to G3/Range Division. When a fire is started in a training area, the OIC should stop all training and concentrate on fighting the fire using all available personnel. The unit will continue to fight the fire until the fire is suppressed or until relieved by personnel from the Fire Department or DPW Forestry Branch. No one will enter an impact area for the purpose of fighting fires without approval of the installation Range Officer.

To prevent fires when using pyrotechnics, smoke pots, etc., place them in areas free of vegetation. Protecting and conserving the natural resources for present and future generations is an integral part of the military mission.

## Chapter 10 Fish and Wildlife (270) 798-9854

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The goal of the Fort Campbell Fish and Wildlife program is to professionally and scientifically manage fish and wildlife resources to support and enhance military training, provide for consumptive and non-consumptive use of natural resources, and to maintain compliance with applicable laws, policies, and regulations (ESA, MBTA, etc.). The program is roughly divided into 4 management groups, although the groups are interconnected into a cohesive unit. The 4 management groups are:

- Game/Habitat management
- Migratory Bird management
- Aquatic Ecology/Watershed management
- Endangered Species management

### I. Game/Habitat Management

Fort Campbell biologists estimate population structure of many game species and manage their habitats on Fort Campbell using science-based survey protocols. These data are utilized to set season regulations and bag limits for game species. Game species on Fort Campbell include white-tailed deer, wild turkey, Northern bobwhite, waterfowl, and various of small game species including squirrel and rabbit. The Fish and Wildlife Program oversees management of game species, hunting regulations, and administers hunting processes such as the sign-in/sign-out system and sale of permits through a web-based program called iSportsman (<https://ftcampbell.isportsman.net/>).

### II. Migratory Bird Management

The Fort Campbell Fish and Wildlife program is the lead program on the installation in ensuring compliance with the Migratory Bird Treaty Act (MBTA, 1918) and Executive Order 13186 (Responsibilities of Federal Agencies to Protect Migratory Birds). Fort Campbell sustains and enhances the military mission through proactive bird conservation and management strategies that supports migratory bird populations. The installation's Migratory Bird Management Strategy (MBMS) document ensures regulatory compliance with the MBTA, which is a federal law prohibiting unlawful killing or "take" of a migratory bird, nest, or egg. Monitoring of migratory birds on Fort Campbell is required to meet the directives of the MBTA. The installation is home to two Species at Risk (SAR), Bachman's Sparrow (*Aimophila aestivalis*) and Henslow's Sparrow (*Ammodramus henslowii*). These two species utilize the native grassland habitat in the training areas on the base. Military readiness activities are exempt from MBTA as long as their actions do not severely affect these populations.

#### Unit Responsibilities

1. Migratory birds and their nests should not be killed, harassed, or disturbed (excluding game species in a hunting season).
2. Avoid mowing or disturbing grassland habitat in the rear area without coordinating or following Range Control and environmental guidance to avoid adverse effects on the nesting migratory SAR species.
3. Do not burn, mow, or otherwise disturb an entire area in one breeding season because disturbance reduces available habitat for one or more growing seasons.



### III. Aquatic Ecology/Watershed Management

Fort Campbell waterways are divided into 3 main watersheds containing 9 sub-watersheds across both Kentucky and Tennessee. All stream monitoring efforts on the Installation adhere to Clean Water Act (CWA) guidelines to ensure base compliance with regulatory entities. Every state is required, by law, to compile a list (303(d)) of all streams in the state that are degraded and do not meet criteria for specific uses, i.e. warm water aquatic habitat, cold water aquatic habitat, recreation, and fish consumption. Fort Campbell streams currently do not meet state water quality standards due to erosional processes impacting streams with siltation and instream habitat removal/destruction. All streams, with the exception of Piney Fork and Fletchers Fork, are listed on the Kentucky and Tennessee 303 (d) lists of impaired streams.

### IV. Wildlife Interactions

Whether in the rear area during rural training exercises or in the cantonment area during normal daily activities, human/wildlife interactions are inevitable. Never approach, harass or feed wildlife. Wild animals are unpredictable, and many carry diseases such as rabies and distemper. As a general rule, if you leave them alone, they will leave you alone. Residents of Fort Campbell can call the DPW Pest Management Program at (270) 798-3110 to report problem wildlife including raccoons, skunks, groundhogs, opossums and squirrels. Deer and bat issues on the cantonment area, and all other wildlife questions and concerns should be relayed to the Fort Campbell Fish and Wildlife Program Manager at (270) 798-9854 or Endangered Species Program Manager at (270) 798-9855.

### V. Stewardship

Stewardship with nature and wildlife is everyone's responsibility. As the footprint of human activity continues to expand, native habitats are degraded, decreased and fragmented. Leaving military residue in the field after training exercises increases rodent populations near bivouac sites and also increases likelihood of encounters with poisonous snakes. It can also result in take of wildlife and damage to equipment.

#### **At a minimum, a good steward:**

- Continues to train as you fight
- Uses hardened stream crossings, does not drive in the streams, and does not wash vehicles in streams
- Does not conduct off-road maneuvers if not necessary to reduce erosion
- Removes all military residue when leaving the field, and disposes of liquid waste through proper channels
- Does not approach, harass or feed wildlife
- Does not remove trees greater than 3" diameter without coordinating with the Endangered Species component of the Fish and Wildlife Program
- Avoids adverse effects on nesting habitat of migratory bird SAR species.

Questions and comments regarding wildlife and/or migratory bird species should be directed to the Fort Campbell Fish and Wildlife Program Manager at (270) 798-9854 or Endangered Species Program Manager at (270) 798-9855.

## Chapter 11 Cultural Resources (270) 412-8174

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The Fort Campbell Cultural Resources Program identifies, manages, and protects all of the archaeological sites, historic structures, and cemeteries on Fort Campbell while sustaining the Army's mission. These sites are protected resources that help us to understand the landscape, tribes, and communities that were here before Fort Campbell. The interpretation of the artifacts (objects that have been modified by people) range from stone arrowheads to glass bottles, to handmade bricks, are used by archaeologists to tell the story for each archaeological site. Pre-contact Native American sites, up to 12,000 years old, are the most common type of archaeological site at Fort Campbell. Native American sites contain the remains of temporary hunting camps, settlements, and human burials. Sites dating to the historical period (1570-1941 A.D.) are the remains of houses, farms, cemeteries, and communities that existed until the construction of Fort Campbell. There are also numerous historic structures associated with the military history of the Installation; the Clarksville Base Historic District preserves one of the few locations nuclear weapons were constructed and stored during the Cold War.

The Fort Campbell Cultural Resources Program strives to protect all of the archaeological sites and historic structures on the Installation. These properties are nonrenewable resources, once a site or structure is damaged or destroyed, all of its valuable historic information is gone forever. Please help protect and conserve the cultural resources of Fort Campbell.

1. Under federal law, it is illegal to excavate, damage, or alter archaeological sites on Fort Campbell.
  - a. Severe criminal penalties, including jail time and fines, can be imposed for damaging archaeological sites and/or collecting artifacts from these sites.
2. Recreational use of metal detectors within Fort Campbell is strictly prohibited.
3. Prior to any hand and/or mechanical excavation on Fort Campbell the environmental review process must be followed.
  - a. Prior to a training activity that involves any ground disturbance, a Dig Permit must be obtained from DPTMS Range Branch (See Environmental Protocol Sheet A-27, 28 for details).
  - b. Please contact the Fort Campbell NEPA Program before any construction projects that involve ground disturbance and/or the modification of any structures (See Environmental Protocol Sheet A-27).
4. If human remains are encountered, they should be reported immediately to the Criminal Investigation Command (CID) and the Cultural Resources Program (CRP). Please secure the immediate vicinity to prevent further disturbance pending inspection by CID and the CRP Manager.
5. If artifacts are encountered during any ground disturbance or training exercise, please report the location to the CRP Manager immediately.

Fort Campbell has over 130 historic cemeteries. These cemeteries include small family, community, and church cemeteries with both marked and unmarked graves. Most cemeteries on Fort Campbell are fenced with Seibert stakes and chains; be aware that several cemeteries do not have headstones, and some are not marked with fencing.

1. To avoid accidentally impacting a cemetery, always make sure that dig requests are submitted. Digging within cemeteries for any reason is strictly prohibited.
2. All training activities should avoid cemeteries.
3. Report any recent cemetery damage and/or ground disturbance to the CRP Manager.
4. If exposed human remains are found within a cemetery or anywhere else, contact CID and the CRP Manager.

Questions and comments regarding the cultural history of Fort Campbell, dig permits, and to report the inadvertent discovery of archaeological materials and/or human remains should be directed to the Cultural Resources Program Manager: (270) 412-8174

## Chapter 12 Threatened and Endangered Species (270)798-9855

The Endangered Species section of the Fort Campbell Fish and Wildlife Program is governed by the Endangered Species Management Component (ESMC), which was signed by the Garrison Commander in October 2020. The ESMC is a law-binding document, and is the basis of how endangered species are managed and monitored on the installation. The goal of the ESMC is to ensure compliance with the Endangered Species Act (ESA), while supporting the Fort Campbell military mission. Identified in the ESMC are conservation goals and objectives designed to protect federally listed species and assist in their recovery.

The presence of three federally listed species has been documented at Fort Campbell, the Indiana bat (*Myotis sodalis*), gray bat (*M. grisescens*), and Northern long-eared bat (*M. septentrionalis*). Both the Indiana bat and gray bat are listed as endangered by the U.S. Fish and Wildlife Service (USFWS). The Northern Long-eared bat (*M. septentrionalis*) is listed as threatened.

**White-nose Syndrome (WNS)** is an infectious disease caused by the fungus *Pseudogymnoascus destructans*. This fungus is believed to have been brought to North America by cavers. Since its discovery in North America in 2006, it is estimated to have killed more than 6 million bats. Seven North American bat species have been affected by the disease, including gray, Indiana and Northern Long-eared bats. Fort Campbell is the first Department of Defense property to report presence of WNS within installation boundaries. WNS cannot be transmitted to humans, or any other species other than cave-dwelling bats.

### I. Bat Management on Fort Campbell

Management of federally listed species on Fort Campbell is conducted in accordance with the ESA, endangered species recovery plans, and U.S. Army regulations and guidance. Fort Campbell regularly monitors populations of gray and Indiana bats by:

1. Monitoring the abundance and diversity of aquatic insect fauna in streams where gray, Indiana and Northern Long-eared bats forage
2. Conducting annual acoustic monitoring surveys
3. Conducting annual mist-netting surveys
4. Restricting timing of timber removal activities

### II. Unit Responsibilities

1. Plan military activities by following Range Control and environmental guidance to avoid adverse effects on threatened and endangered species.
2. Minimize tree removal activities to only what is necessary during training mission activities.
3. Report sightings of dead or dying bats to the Endangered Species Program Manager
4. Ford creeks only at designated crossings.



- **Department of Defense personnel who violate the provisions of the Endangered Species Act or implemented regulations are subject to both civil and criminal penalties.**
- **Do not touch or approach any bat, whether on the ground or roosting in/on a building. A bat on the ground is likely a sick bat.**
- **If you find a bat, report it immediately to the Endangered Species Program Manager. (270) 798-9855**

## **Chapter 13 Agricultural Outlease Program (270) 461-2244**

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The Agricultural Outlease Program (Ag Lease) manages approximately 4800 acres of hay and crop fields. Fields are leased to local farmers under a five-year contract. The lessees pay rent annually and are required to mow or crop annually to prevent the fields from reforestation.

Fort Campbell's Ag Lease is one of IMCOM's most viable programs generating \$570K annually. This program saves the Army roughly \$1M per year in maintenance fees. Fort Campbell would not have open ground for training without incurring a tremendous cost for clearing and maintenance.

As Fort Campbell's training needs grow, leases are revoked, and the land is once again available for training. The money generated from ag leases is used for natural resource projects like erosion repair and wildlife habitat restoration.

Ft. Campbell leases many of the open fields to area farmers for row-crop (i.e. corn, soybeans, or wheat) and hay. No digging permitted in agricultural fields. Helicopters, vehicles, and training in row-crops cause loss in crop production. Avoid row crop fields. Instead use the 15' grassed field edge for maneuverability between fields or use adjacent grassed fields to avoid crop damage and exposure to pesticides.

Avoid landing or hovering helicopters over row-crops; use open grass fields or hay fields. DZs are managed as hay fields and are available for unit training at all times. Farmers are not required to mow or harvest fields prior to training; however, farmers can sometimes adjust harvest dates with advanced coordination through DPW Conservation Branch. Agricultural fields are explicitly marked on maps in RFMSS. Farmers expend considerable time and money to harvest crops on these fields and are not reimbursed for training-related crop damage nor is the damage covered under crop insurance.

### **Unit Responsibilities:**

Per CAM Reg 385-5, avoid unnecessary damage to crop fields as lessees do not receive compensation for crop damage. Adhere to the following guidelines:

- a) Refer to the maps in the RFMSS Library to identify and avoid crop fields.
  - a. Crop fields are explicitly marked on the Fort Campbell Special Map located under MAPS in the RFMSS Library. Realize that farmers are managing their fields year-round even in the winter. Throughout the season, farmers are constantly checking their fields for nutrient deficiencies, pest problems, applying pesticides and fertilizer, and some plant winter crops. This requires unabated access year-round. If any of these problems are left unchecked, the farmer can suffer unnecessary revenue losses.

- b. CAUTION: Pesticides are applied year-round even when crops are not actively growing. Virtually every chemical, both natural and synthetic, can be toxic. Soldiers who train in areas treated with pesticides can face exposure by contact with pesticide residues on plants or soil. This indirect exposure can also be inhaled or tracked home on shoes and clothing.
- b) Use open grass fields or field edge instead of crop land.
- c) Remove trash, brass, c-wire, posts, etc. that pose potential hazards to farm equipment causing damage and financial burdens.
- d) Avoid hovering helicopters over crop land. Use open grass fields or hay fields. Hovering helicopters cause damage and reduce crop production.

## Chapter 14 Water Quality and Stormwater Management

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Fort Campbell must protect water resources on the installation to include groundwater and surface waters. Fort Campbell operates in compliance with Clean Water Act and Safe Drinking Water Act permits. The installation develops, implements, and enforces a stormwater management program designed to reduce the discharge of pollutants to the maximum extent practicable to protect water quality. The program implements control measures, including illicit discharges (dumping), construction site stormwater runoff control, and post-construction stormwater management in new development and redevelopment. Certain activities on the installation must also meet compliance with the Tennessee and Kentucky NPDES General Permits for Industrial Activities. Installation staff, tenants, activities, contracting offices, and contractors must comply with all the requirements outlined in CAM REG. 200-1, Section 13r and the Fort Campbell Stormwater Management Plan and Checklist. Fort Campbell Stormwater Program staff conducts inspections of site activities as needed to ensure compliance with Clean Water Act permits.

Dumping of POL products, paint, concrete wash water, and other pollutants into the storm sewer system, including drains, ditches, and streams, is prohibited on Fort Campbell. Certain field training activities, such as water purification operations and food service graywater have a potential for polluting water resources. Please consult applicable environmental protocol sheets. The Fort Campbell Stormwater Program can answer any questions.

## Chapter 15 Wetlands

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Fort Campbell's water resources occur as surface and ground water. Surface streams often flow into sinkholes, underground channels, and sinking streams. Ground water flows beneath the surface through fractured limestone and serves as Fort Campbell's drinking water reserve. Fort Campbell's quality of life is directly related to the quality and wise use of these resources. A wetland is a collective term for lakes, rivers, streams, swamps, marshes, and similar areas that develop between open water and dry land. These sites are a valuable natural resource improving water quality, reducing flood and storm damage, providing wildlife habitat, supporting hunting and fishing activities, and providing educational and aesthetic promise. The majority of federal and state listed threatened and endangered species inhabit these unique areas. Wetlands are currently protected areas.

**Unit Responsibilities:**

- 1) Avoid activities in and around wetland areas that will produce extended soil compaction, excess runoff (erosion) or vehicular traffic through a suspected site.
- 2) Police wetland areas for trash or debris.
- 3) Any activity which requires digging should be referred to DPW Conservation Branch and will require a TN One-Call issued dig permit (See Environmental Protocol Sheet A-26/26A for details).

**Chapter 16 Range Control/Integrated Training Area Management**

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The Integrated Training Area Management program was designed as a comprehensive approach to land management on all Army installations. All elements serve to support land management decisions on Army installations.

**Unit Responsibilities:**

- 1) Avoid activities that will produce extended soil compaction, excess runoff (erosion), or vehicular traffic through sensitive areas.
- 2) Police areas for trash or other field residue to reduce degradation of aesthetic value and wildlife habitat.
- 3) Limit traffic in and around wetland areas. Use of unauthorized fords is prohibited unless training requirements are authorized by both DPW Environmental and Range Control personnel.
- 4) Reduce unnecessary-necessary travel on DPW Forestry firebreaks/combat trails. These roads are maintained by DPW Forestry strictly for fire suppression activities during wildfire situations. Military use of these roads increase erosion and degrade the natural resources further.
- 5) Limit mechanical digging to those sites designated by the Tennessee One-Call System (See Environmental Protocol Sheet A-26/26A for details). All mechanical digging must be coordinated through the Tennessee One-Call System. Each dig request must include a recovery date that outlines the recovery to include filling of any trenches or leveling of any berms. Many environmental sites exist in the rear training areas. Federal law regulates these sites and penalties can be enforced if they are disturbed.
- 6) Do not place nails, spikes, or any other metal object into hardwood trees. Remove all cords, twine, and communication wire that are wrapped and tied around trees. Native tree species are regularly timbered and these actions directly affect the quality of the wood. All personnel assigned to Fort Campbell, both military and civilian, are environmental stewards for the installation and are integral parts in protecting all of the natural resources.



## Chapter 17 NEPA PROGRAM (270) 798-9784 / (270) 798-9640

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The National Environmental Policy Act (NEPA) requires the federal government to consider environmental impacts on social, cultural, economic and natural resources from proposed actions. In conjunction with US Army's Policy 32 CFR Part 651, Army Regulation 200-1 implements federal, state, and local environmental laws and DOD policies.

All activities proposed within the **cantonment area** including those submitted by military units and those in the training areas, and on ranges (other than routine military training). are required to submit FC Form 200-1 to the NEPA Program Manager and NEPA Program Coordinator to ensure compliance. Activities include but are not limited to: soil excavation; ground beautification or modifications; construction; renovation, maintenance, or demolition of buildings, motor pools, or structures; etc. require FC Form 200-1. Project proponent must complete Section 1 and the Project Description. Please include as much detail (i.e. total project area, potential alternative sites, potential area disturbance, maps, etc.) to prevent delays in completing environmental reviews. Once submitted, the NEPA Program Coordinator will distribute the request to DPW Environmental Programs (air quality, forestry, cultural resources, hazardous waste, water quality, wildlife, etc.) to determine environmental effects and recommend the necessary course of action to meet compliance.

Once FC Form 200-1 is complete:

- Project may qualify as Categorically Excluded (**CX**) in which these activities were previously determined to be of no significant environmental impact and project may proceed as described.
- Project may require additional analysis initiated by the NEPA Program using FC Form 200-2, a Record of Environmental Consideration (**REC**) in which the proponent may be contacted for additional information and/or further action. Completed RECs detail environmental requirements. Project proponents must keep the REC in project records and are responsible for adhering to specified environmental requirements.
- If project poses significant impact, an Environmental Assessment (**EA**) or Environmental Impact Statement (**EIS**) will be initiated.

**NOTE: Routine military training in the rear area does not require FC Form 200-1 but may require dig permits from Range Control (see A-27, 28). Projects other than military training in the rear area, for example range construction, trail building, and installation of low water crossings, do require FC Form 200-1.**

*For more information concerning Dig Requests, see Appendix A, Environmental Protocol Sheet A-27, 28. For examples concerning NEPA Program forms (FC Form 200-1, FC Form 200-2), see Appendix E.*