# COMMANDER'S GUIDE TO ENVIRONMENTAL REQUIREMENTS

SEPTEMBER 2021

PREPARED BY U.S. ARMY ENVIRONMENTAL COMMAND

# INSTALLATION'S
# TOP 10 FY _____

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## TOP 10 FY _____

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# KEY FACTORS OF THE ENVIRONMENTAL PROGRAM

*IN ORDER OF RISK TO MISSION AND READINESS*

## THE GARRISON COMMANDER

» Engages actively with the Senior Commander, activity tenants, and on- and off-post community

» Commits appropriate resources (staff and funding) to ensure compliance with federal, state, local, and applicable host nation environmental laws and regulations for all activities

» Ensures integration of environmental considerations to support military training and readiness operations

» Updates installation plans and procedures to address the projected impacts of changing climate; incorporates the results of the Army Climate Assessment Tool into all appropriate plans

» Is responsible, criminally or civilly liable, for notices of violation (NOVs), fines, and enforcement actions or equivalent

» Applies for, signs, and allocates funding for the maintenance of all applicable federal, state, and local environmental permits

» Addresses future changes that potentially threaten access to maneuver spaces and training ranges

» Is responsible for implementing an installation-wide Hazardous Materials Management Program (HMMP) for all hazardous materials (HM) throughout their lifecycle

» Ensures the conduct of fence-to-fence internal assessments of all environmental media as well as resulting corrective actions

» Addresses concerns of federally recognized American Indian Tribes, Alaska Natives, and Native Hawaiians

» Focuses on long-term sustainable use, ecological management, conservation, and restoration of the land to support the mission

» Prioritizes the protection of supplies and facilities as well as the constructed and natural infrastructure supporting critical missions

» Updates installation plans and procedures to address the projected impacts of changing climate and extreme weather

» Supports restoration efforts to clean up contamination caused by legacy waste management and/or disposal practices, including emerging chemicals such as PFAS and 1,4-Dioxane

## KEY QUESTIONS TO ASK THE DIRECTOR OF PUBLIC WORKS AND ENVIRONMENTAL CHIEF

» Do we have sufficient staff and resources to ensure environmental compliance?

» Do we participate in annual work planning for DPW/Master Plans and Directorate of Plans, Training, Mobilization, and Security?

» Are plans updated to incorporate climate change adaptation and mitigation strategies?

» What is our working relationship with local, state, and federal regulators? When did we last meet with them?

» Do the various installation entities that either affect or are affected by environmental actions communicate effectively?

» Do we have any current NOVs or ENFs? What is the status of each? Is IMCOM/USAEC assisting us in resolving them?

» How often does the Environmental Quality Control Committee (EQCC) meet? How do we keep the EQCC informed?

» How are we controlling and reducing our hazardous material usage? Do we have an effective Hazardous Material Management Plan (HMMP)?

» Are the installation plans, mainly conservation related, up to date and effective for our current mission?

» Do we have any threatened, endangered, and/or at-risk species and what is the current management plan?

» How many sites on the installation are being addressed under the Installation Restoration Program (IRP) and/or Military Munitions Response Program (MMRP)? Are there any off-post contamination concerns at the installation?

» Have our people been properly trained to do their job and non-environmental jobs in an environmentally compliant manner?

» How is our environmental program perceived in the community? How do we inform and interact with the community? Are there any special interest groups and what are their chief concerns? How is our environmental program perceived among installation tenants?

» Are all environmental requirements incorporated into Military Construction (MILCON) projects and communicated to your staff for permit, inspection, and reporting changes?

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# INTRODUCTION

The Commander's Guide to Environmental Requirements is designed to assist Garrison Commanders in leading and managing an effective environmental program. This Guide is divided into two sections:

- Executive Summary to highlight key components of the Army's Environmental Program
- Index of Environmental Functional Areas to provide Commanders a basic knowledge of key program areas

NOTE: This guide does not supersede regulations, policy, or guidance. Its goal is to provide information that assists Garrison Commanders in addressing and fulfilling their installation's environmental requirements. Army Regulation (AR) 200-1, Environmental Protection and Enhancement, outlines command and Army Environmental Program (AEP) support requirements.

## INFRASTRUCTURE/FACILITIES

Installations face the unique challenges from decades of underinvestment and new facility sustainment challenges related to climate change. These challenges have led to a degradation of some infrastructure elements. A direct result of that degradation is increased risk for noncompliance with environmental laws and required operating permits, potentially resulting in fines, penalties, and citations. Environmental issues can quickly elevate to the highest levels of military and civilian leadership and effective management is critical. Ensuring compliance with environmental laws requires understanding the environmental aspects of installation operations, engaging leaders across installations to proactively identify potential mission impacts, and effectively applying resources to ensure mission sustainment.

## SUPPORTING READINESS AND TRAINING

Garrison Commanders enable mission readiness and support realistic training through effective environmental management. The air, water, and land our Army requires to support day-to-day operations and readiness forms a natural infrastructure required for effective military training and testing. This view transforms the costs of environmental compliance into investments that improve and sustain operational capability.

See page 15 for reporting procedures upon receipt of an enforcement action.

# ARMY ENVIRONMENTAL PROGRAM (AEP) KEY PLAYERS

The following organizations set policy, provide guidance, or support installations in attaining and maintaining environmental compliance:

**ASSISTANT SECRETARY OF THE ARMY FOR INSTALLATIONS, ENERGY, AND ENVIRONMENT (ASA(IE&E))** is the principle advisor to the Secretary of the Army on matters related to Army installations and their impact on the environment. This office is responsible for developing policies and programs for all Army environmental efforts.

**DCS G-9 DEPUTY CHIEF OF STAFF FOR INSTALLATIONS** is the principle military adviser to the ASA (IE&E) on a broad array of programs to include environmental programs. This office sets AEP priorities, objectives, targets, and success indicators that aid in focusing installation environmental program management.

**ARMY COMMANDS (ACOMS)/DIRECT REPORTING UNITS (DRUS)** publish environmental program guidance laying out recommended and required actions for successful environmental program management.

**U.S. ARMY ENVIRONMENTAL COMMAND (USAEC)** is a subordinate command to the Installation Management Command (IMCOM) and provides environmental services and solutions in support of the AEP enabling Army readiness and sustainability. USAEC provides technical expertise on environmental quality and technology and manages the environmental cleanup programs. Focus areas include assessing and improving installations' environmental performance; evaluating and transferring best management practices and technologies to enhance environmental stewardship; and assimilating, analyzing, and communicating environmental information.

**MEDICAL COMMAND/U.S. ARMY PUBLIC HEALTH CENTER (USAPHC)** identifies and assesses current and emerging health threats, develops and communicates public health solutions, and assures the quality and effectiveness of the Army's Public Health Enterprise. USAPHC provides support in the areas of medical entomology, environmental health engineering, sanitation, veterinary, industrial hygiene, occupational health, and preventive medicine readiness planning and training.

**U.S. ARMY CORPS OF ENGINEERS (USACE)** manages one of the largest federal environmental missions: restoring degraded ecosystems; constructing sustainable facilities; regulating waterways; managing natural resources; and cleaning up contaminated sites from past military activities. USACE's environmental program provides technical management, design, and execution of a full range of environmental protection, cleanup, and sustainability activities.

# COMMANDER'S ENVIRONMENTAL MANAGEMENT TOOLS

While your environmental staff and legal team are critical assets in supporting your oversight role, familiarity with the following tools will assist you in your environmental management role.

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SYSTEM (EPAS) AND STAFF ASSISTANCE VISITS (SAV)** An EPAS provides commanders with a comprehensive look at environmental risks associated with their facilities and missions and consists of both internal and external assessments.

See page 62-63 for additional details.

An EPAS identifies and mitigates environmental liabilities and risks to training and operations from regulatory noncompliance. Internal assessments are conducted annually, at a minimum, by installation personnel as part of their regular management, checking, and corrective action functions, unless an external assessment is conducted that calendar year. Internal assessments include a review of previous assessments and draft installation corrective action plan (ICAP), review corrective actions not completed, assess compliance with any new regulatory requirements, and address areas specified by higher command.

Assessment results and the ICAP are made available to the Commander's Environmental Quality Control Committee (EQCC). USAEC schedules an external EPAS at supported installations once every three years or as warranted based on risk, which may be more or less frequently. This assessment provides an objective review of installation operations and activities. At the installation's request, USAEC can also help installations develop corrective actions for deficiencies identified by the assessment.

Staff Assistance Visits are available upon request of the Garrison Commander to assist an environmental staff with a particular issue or weakness and provide recommendations and solutions to help assure future environmental quality and compliance.

**THE COMMANDER'S ENVIRONMENTAL QUALITY CONTROL COMMITTEE (EQCC)** The EQCC is comprised of senior staff from the installation's military units and tenant organizations. The EQCC members have the ability to make changes to organizational policy, processes, and procedures based on the outcome of EQCC discussions.

**THE EQCC:**

- Meets quarterly
- Plans, executes, sets goals for, and monitors actions and programs with environmental implications
- Provides an opportunity to involve stakeholders in the environmental management process
- Assists in identification of environmental funding requirements
- Addresses following items:
  - » Internal and external audit results
  - » Communications from external sources (e.g. noise complaints, etc.)
  - » Environmental performance of the organization, progress towards environmental goals
  - » Status of corrective actions
  - » Changes in mission, laws, or regulations that may impact installation activities

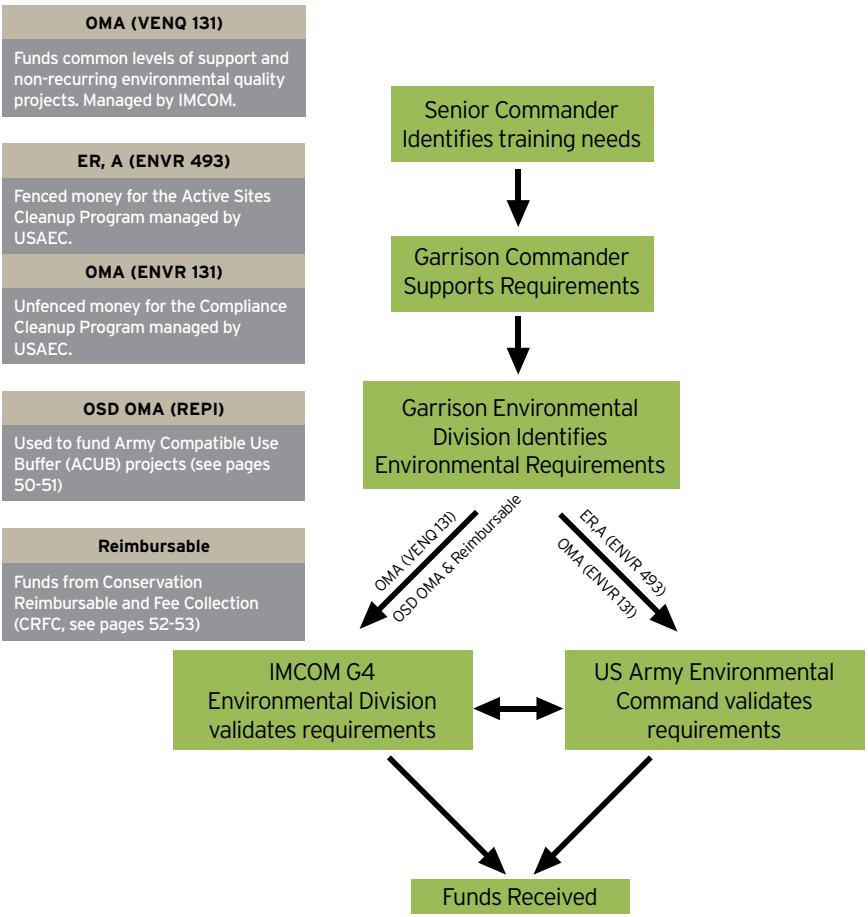
# FUNDING ENVIRONMENTAL REQUIREMENTS

Understanding and ensuring participation in the environmental requirements build is a key mission support activity.

There are two main appropriations that fund environmental programs, Operations and Maintenance Army (OMA, 131) and Environmental Restoration, Army (ER,A 493). In addition, other funding sources are available e.g., Readiness and Environmental Protection Integration (REPI) Program and Conservation Reimbursable and Fee Collection (CRFC) Program depending on eligibility. The overarching environmental funding process is shown below:

## Annual Funding Guidance Provides Eligibility Requirements for Projects

**(Note: Not all environmental related requirements are eligible for environmental program funds, see pages 66-67)**



# OVERSEAS ENVIRONMENTAL MANAGEMENT

Army overseas installations are not directly subject to the majority of federal environmental requirements that apply on U.S. territory. Environmental compliance at overseas installations depends on DoD and Army policy, host country requirements and standards, and Status of Forces Agreement (SOFA). Overseas garrisons must meet the environmental standards and criteria in the country-specific Final Governing Standards (FGS).

When no country-specific FGS are in place, overseas installations comply with DoDM 4715-05 Overseas Environmental Baseline Guidance Document Volumes 1, 2, and 3, the Overseas Environmental Baseline Guidance Document (OEBGD) which is based on U.S. laws and regulations. Commanders must plan, program, and budget for FGS or OEBGD compliance.

Commanders of overseas installations should consult with their environmental and legal staffs for details related to country-specific requirements.

The Secretary of Defense designates a Lead Environmental Coordinator (LEC) for each foreign country requiring FGS to reconcile the requirements of applicable international agreements and applicable host nation environmental standards and protect human health and the environment. See DoD Instruction 4714.05 for more information.

## KEYS TO SUCCESS

**To execute a successful environmental program, the Garrison Commander:**

- Communicates the Senior Commander's priorities to the environmental staff to ensure proactive planning and mitigation of environmental barriers to mission execution.
- Executes a quarterly Environmental Quality Control Committee (EQCC). The EQCC will help to plan, execute, and monitor actions and programs with environmental implications. The committee will identify issues, make recommendations, and advise the Garrison Commander.
- Forms strong relationships with federal, state, and local regulators and external stakeholders (community, tribes, etc.), and maintains these relationships through transparent communication and involvement.

# ENFORCEMENT ACTIONS (ENF)

Maintaining compliance with environmental regulations is crucial and an important aspect of command. On the occasion when ENFs are received (often in the form of a Notice of Violation (NOV)), commanders must ensure proper and timely reporting through the installation legal staff/staff judge advocate, official electronic Army reporting system, and appropriate command channels. The commander who does not act promptly to correct environmental violations that he/she is or should be aware of, may be subject to prosecution, even though he/she had no direct or even indirect involvement in the violation.

## COMMANDER'S ACTIONS

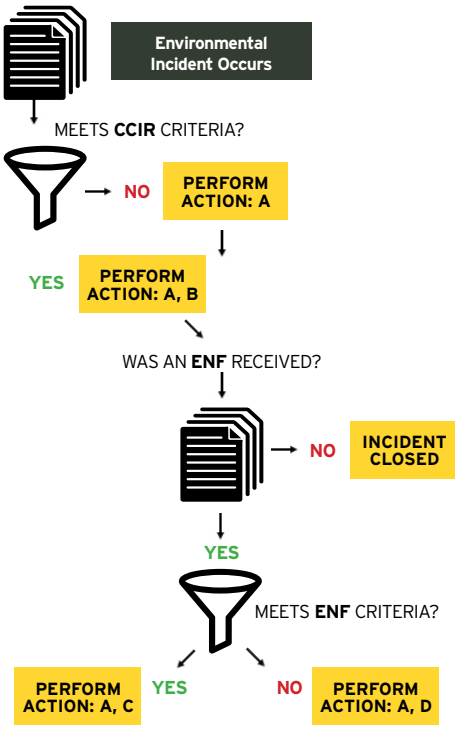
- Report ENFs/NOVs in accordance with current Army environmental quality reporting policy requirements as published and updated by the Headquarters, Department of the Army (HQDA).
- Notify IMCOM Directorates and G4 Environmental Division and comply with Commander's Critical Information Requirements (CCIR) outlined in Execute Order (EXORD).
- Coordinate with HQDA Environmental Law Division (ELD) in writing, regarding litigation, administrative proceedings, and settlement.
- Initiate corrective actions when deficiencies are identified.

ENFs and NOVs threaten readiness and mission accomplishment. Delays or failure to respond in accordance with DoD/Army policy can increase or compound the potential for military training delays or prohibitions, fines, and criminal or civil penalties. Because ENF/NOV responses may set precedents for the Army/Department of Defense (DoD), the Garrison Commander must coordinate with ELD. USAEC may, upon request and command approval, provide technical and legal assistance on issues related to ENFs/NOVs.

**WHERE TO GO FOR ADDITIONAL INFORMATION**

Information on most programs and regulations in this guide can be found at, or in links from, the USAEC website: https://aec.army.mil

# ENF REPORTING REQUIREMENTS

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| **ACTION A** | **Notify IMCOM G4, Directorate/Installation Point of Contact** (POC) and G4 Mailbox: usarmy.jbsa.imcom-hq.mbx.g4-env@mail.mil |
| **ACTION B** | GC/Garrison Manager (GM)/Deputy GC/Deputy GM will **email a written report within two hours** to the IMCOM Deputy Commanding General (DCG), Chief of Staff (COS), IMCOM Directorate (ID), and IMCOM Operations Center |
| **ACTION C** | **Enter ENF into the database of record within 48 hours (two business days),** with verification/ confirmation through proper Command channels |
| **ACTION D** | **Enter ENF into database of record within seven business days,** with verification/ confirmation through proper command channels |

## ENF

A formal, written notification of violation of any applicable statutory or regulatory requirement *(DoD Instruction (DODI) 4715.06, 04 May 15)* by the Environmental Protection Agency (EPA) or other authorized federal, state, tribal, or local environmental regulatory agency.

## Commander's Critical Information Requirement (CCIR) Criteria (in accordance with (IAW) IMCOM Regulation No. 190-45-1)

- Environmental incident or action that shuts down installation operations or training due to spills, range fires, legal suits, or administrative order
- Environmental incident requiring immediate notification to any DoD or external agency
- Any incident the GC or SC deems to be of interest to IMCOM leadership, based on its nature or gravity, potential for adverse publicity, or potential adverse consequences

## ENF Criteria (IAW AR 200-1 Environmental Protection and Enhancement)

- Criminal enforcement
- Fine, penalty, fee, or tax
- Installation-wide major mission restriction, Army- or DoD-wide impact, media attention, or community (on-/off post) impact
- Third party fault (non-Army entity is responsible in whole or part for the alleged violation(s))

# ENVIRONMENTAL FUNCTIONAL AREAS

Throughout this guide we provide an overview of the environmental functional areas, along with the associated laws and regulations, stakeholders and an explanation of the Commander's Role. In some cases we also provide an example of noncompliance, the associated law, and the potential outcome for noncompliance. We have identified three different categories of potential outcomes: impacts to training or readiness, substantial fines, and criminal or civil penalties. These categories are identified by icons as shown in the legend below.

POTENTIAL OUTCOMES OF NONCOMPLIANCE WITH ENVIRONMENTAL REGULATIONS INCLUDE

Impacts to Training or Readiness

Substantial Fine

Criminal or Civil Penalties

# INDEX OF ENVIRONMENTAL FUNCTIONAL AREAS

# CLIMATE CHANGE

"We in the Department of Defense know first-hand the national security risk posed by climate change because it affects the work we do every day. Around the world, climate change is a destabilizing force, demanding new missions of us and altering the operational environment. At the same time, climate-related extreme weather affects military readiness and drains our resources. In just the past few years, wildfires have forced evacuations at bases in the western United States, while hurricanes on the East Coast and flooding in the Midwest have inflicted billions of dollars of damage on facilities that are home to key warfighting capabilities." This was taken from the Department of Defense Draft Climate Adaptation Plan Submitted by the Office of the Undersecretary of Defense (Acquisition and Sustainment) to the National Climate Task Force and Federal Chief Sustainability Officer on 27 May 2021.

Within the Army we are tackling climate change through multiple programs both new and old. Climate adaptation has us looking at the way we do business and making changes that allow us to take advantage of the changes. Climate adaptation also has us making changes that reduce negative effects. Many of our efforts in sustainability are a result of climate adaptation. Resilient installations have been our goal for years. We have made progress and are now better able to anticipate, prepare for, withstand, respond, and recover quickly from severe weather events and we continue to improve by sharing lessons learned, transferring technologies, and continuously updating our planning documents. All our efforts in Net Zero water and Net Zero waste are adaptations in our processes to make us more resilient. Climate mitigation are those measures we take as an Army to reduce future climate change by reducing emissions of heat-trapping gases or removing carbon dioxide from the atmosphere.

Army leaders must consider climate information/intelligence in all decision making: strategic, operational, and tactical. The Army has always trained in extreme conditions and tested our equipment in extreme conditions. We will continue to train, test, assess, and adjust, identifying requirements for improvements to current equipment and systems or identifying requirements for future equipment and systems. Army installation managers and commanders must continue to strive for resilient installations so that our testing and training capabilities can meet our training and testing needs. Resiliency doesn't just apply to our built infrastructure, although that is vital. It also applies to the natural infrastructure. We must maintain the ecosystems that thrive on

our installations, considering climate in all of our Integrated Natural Resource Management Plans (INRMPS) using the Commander's Guide to Climate Adaptation for DoD Natural Resource Managers (https://denix.osd.mil/nr/commanderadaptationguide/documents/commander-adaptation-guide/)

Installation master plans consider both climate adaptation and climate mitigation and Army commanders must continue working to protect critical assets and ensure installations are mission-ready in the face of current and extreme weather threats. Commanders must seek to use more renewable energies, improve energy efficiency, and decrease consumption, because bolstering resilience to climate change now reduces the future threat by reducing the magnitude of climate threats. Some of these technologies may also reduce harm from climate change if they make an installation less sensitive to the changes. The Army has established its Army Climate Change Working Group to synchronize and direct Army activities to address climate implications and policy, to plan and implement across the force, and to achieve and execute climate change objectives. The Army is focused on mitigation efforts to reduce greenhouse gas emissions and the magnitude of climate threats and adaptation efforts to reduce harm from those threats.

The Army is focusing its climate preparedness and resilience approach on four lines of effort: Improve energy-related capability and efficiency of the force; prepare a climate-ready force; optimize resilience and sustainability of built and natural infrastructure; and ensure climate-secure operations and sustainment. The Army must conduct a major transition in operations and energy consumption during FY22-28.

## LAWS AND REGULATIONS

- Executive Order 14008, Tackling the Climate Crisis at Home and Abroad, 27 Jan 2021
- Office of the Director of National Intelligence Annual Threat Assessment of the U.S. Intelligence Community, 9 Apr 2021
- Secretary of Defense Message to the Force, 4 Mar 2021
- SecDef memorandum on Establishment of the Climate Working Group, 9 Mar 2021
- DoD Climate Adaptation Plan
- ODASA (Energy and Sustainability) memorandum on U.S. Army Actions to Enhance Installation Resilience to Changing Climate and Extreme Weather, 15 Jan 2021
- DAS memorandum on Establishing the Army Climate Change Working Group, Mar 2021

- Army Directive 2020-08: U.S. Army Installation Policy to Address Threats Caused by Changing Climate and Extreme Weather, 11 Sep 2020
- U.S. Army Installations Strategy, Dec 2020
- Army Climate Strategy
- Army Climate Action Plan

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

- INTERNAL
  - Master Planning, Environmental Management, Facilities Management, Real Property
- EXTERNAL
  - Local community (Council of Governments), Neighboring Federal Facilities


Army Climate Strategy Lines of Effort and Enablers (from Army Climate Strategy)

## COMMANDER'S ROLE

- Ensure climate change impacts are documented in planning documents
- Take an installation-wide approach to:
  - Increase buying power
  - Rebuild infrastructure for a sustainable economy
  - Advance conservation, agriculture, and reforestation
  - Secure environmental justice
  - Spur economic opportunity
- Participate in innovative technologies research and demonstration validations
- Measure progress towards achieving established goals

# PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS)

## OVERVIEW

Per- and polyfluoroalkyl substances (PFAS) are a group of man-made chemicals that includes PFOA, PFOS, PFBS, GenX, and many other chemicals used to make fluoropolymer coatings and products that resist heat, oil, stains, grease, and water.

The Army is taking a three-pronged approach to manage risk and respond to PFAS use, storage, and release on Army installations: 1) Test drinking water; 2) Investigate past releases; 3) Mitigate use of Aqueous Film Forming Foam (AFFF).

The Army's priority is to ensure no one is drinking water with PFOS (perfluorooctane sulfonate) and PFOA (perfluorooctanoic acid) levels that exceed the EPA's lifetime health advisory levels (70 parts per trillion individually or combined) due to Army operations. Safe drinking water is a critical commodity Army installations must maintain to support readiness and the health and safety of Soldiers, Families, and Civilians.

The Army is in the process of identifying locations on Army installations where soil, surface water, and/or groundwater may have been contaminated with PFAS due to the use, storage or handling of AFFF, a product used during firefighting/fire training. Although there are other sources of PFAS releases, the predominant mechanism for releases was through the historic use of AFFF. Contaminated sites may pose potential risk to human health and the environment and must be properly addressed to remove or prevent unacceptable risk.

The Army follows the federal cleanup law, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), which uses a risk-based scientific approach to environmental

**CHEMICAL TERMS**

PFOA - Perfluorooctanoic acid
PFOS - Perfluorooctane sulfonate
PFBS - Perfluorobutanesulfonic acid
GenX - Hexafluoropropylene oxide dimer acid

remediation and restoration. AFFF was required by military specification (MILSPEC) for firefighting and crash response, including responses to fuel fires or spills; fire training exercises; crash crew training exercises; hangar system operations and testing; and emergency response actions. The Army no longer uses AFFF for maintenance, testing, or training on Army installations worldwide.

Since 2016, AFFF has only been used at Army installations to address real-world emergencies. However, the Army is required to phase out its use of AFFF at all military installations by 1 Oct 2024, with few exceptions, and to immediately stop use of AFFF in military training exercises pursuant to the 2020 National Defense Authorization Act (NDAA) signed into law on 20 Dec 2019.

If test results indicate that drinking water on or off an Army installation contains PFOS/PFOA above the EPA's lifetime health advisory due to Army operations, the Army will take action to reduce it to below the health advisory levels or will provide an alternate water supply until a long-term solution is implemented.

## LAWS AND REGULATIONS

- Comprehensive Environmental Response, Compensation and Liability Act
- Resource Conservation and Recovery Act
- Clean Water Act
- Safe Drinking Water Act of 1974
- Federal Facility Compliance Act
- PFAS sections in National Defense Authorization Acts of 2020, 2021, and beyond
- AR 200-1 Environmental Protection and Enhancement

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

- INTERNAL
  - USAEC, IMCOM G4 Environmental Division, Garrison environmental staff, Garrison tenants, installation fire department, all who live and work on the installation who drink the water
- EXTERNAL
  - Federal, state and local regulators, Tribes, local elected officials, water purveyors (privatized and purchased), well record keepers for the area, and affected community members

## COMMANDER'S ROLE

- Ensure installation remains compliant with all applicable PFAS-related DoD and Army policies, as well as all state and federal laws and regulations.
- Ensure discovered PFAS exceedances, releases, or AFFF use and spills are appropriately reported IAW HQDA EXORD 222-17, FRAGO 5.
- Forward through/to memo (provided by USAEC) to notify HQDA when off-post sampling is necessary.
- Approve off-site data collection and any off-post monitoring.
- Notify higher authorities prior to initiating any off-post response actions.
- Notify higher headquarters of Congressional or media queries regarding PFAS on your installation.
- Maintain a public affairs program that encourages public involvement.
- Ensure PFAS is included in the Consumer Confidence Report or Water Quality Report as appropriate.
- Engage communities on and off the installation, hear their concerns, receive community input, present information, and answer questions to provide transparency in actions in accordance with ASA (IE&E) and Assistant Secretary of Defense for Sustainment (ASD-S) memoranda.
- After coordination with Army chain of command, bring in key elected officials and regulators as soon as possible to get support and buy-in on the Army PFAS assessment process before engaging the public.
- Approve decision documents for PFAS cleanup actions as appropriate.
- Support and approve responses to PFAS data calls within required timelines.
- Notify IMCOM when new PFAS regulations are proposed or issued for your locality that will require modification of existing treatment facilities.
- Review PFAS webpage related to your installation and notify USAEC of inaccuracies (https://aec.army.mil/index.php/PFAS).
- Ensure that inventory controls are in place to replace, reduce, and eliminate the purchase of PFAS containing AFFF as new materials are brought online.

**PFAS REPORTING**

- Any spill or uncontained release of PFAS
- Any drinking water samples above the lifetime health advisory level of 70 ppt

# NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

## OVERVIEW

NEPA affects virtually every proposed action that uses federal funding. The act requires federal agencies to consider the environmental impacts of their actions or undertakings.

Early integration of NEPA into the planning process guides the project proponent to consider other alternatives that mitigate or reduce environmental impacts. Incorporating NEPA into early stages of planning supports the mission by providing leaders with alternatives to manage risk and reduce the potential for project delays. The NEPA process is the systematic examination of possible and probable environmental consequences of implementing a proposed action. Army leaders use the NEPA process to make more informed decisions.

There Are Three Levels Of Environmental Review Of Proposed Actions:

- A Categorical Exclusion (CX) is for those actions that the Army has determined do not individually or cumulatively have a substantial effect on the human environment.
- An Environmental Assessment (EA) is prepared when no categorical exclusion is available, the proposed action is not covered adequately within the general scope of an existing EA or Environmental Impact Statement (EIS), and no significant environmental impact is anticipated. An EA results in either a Finding of No Significant Impact (FNSI or FONSI) or a Notice of Intent (NOI) to prepare an EIS. The EA process requires the Army to make an EA and draft FNSI available to the public for review and comment prior to making a final decision.
- An EIS is necessary when an action clearly has significant environmental impacts or when an EA cannot be concluded with a FNSI. The EIS process includes substantially more public engagement than the EA process. An EIS results in a Record of Decision (ROD) documenting the selection of an action alternative. The decision-maker will weigh mission requirements, public concerns, and environmental impacts when selecting the alternative.

## LAWS AND REGULATIONS

- NEPA (32 Code of Federal Regulations (CFR) Part 651) Environmental Analysis of Army Actions
- 40 CFR Parts 1500-1508, Council on Environmental Quality Regulation for Implementing NEPA and Administrative Procedures Act

**EXAMPLES OF NONCOMPLIANCE**

Failure to adequately describe and measure impacts

**LAW**
NEPA

**IMPACT**

- Army Policy to Consider GHG and Climate Change in NEPA Reviews (4 March 2021)

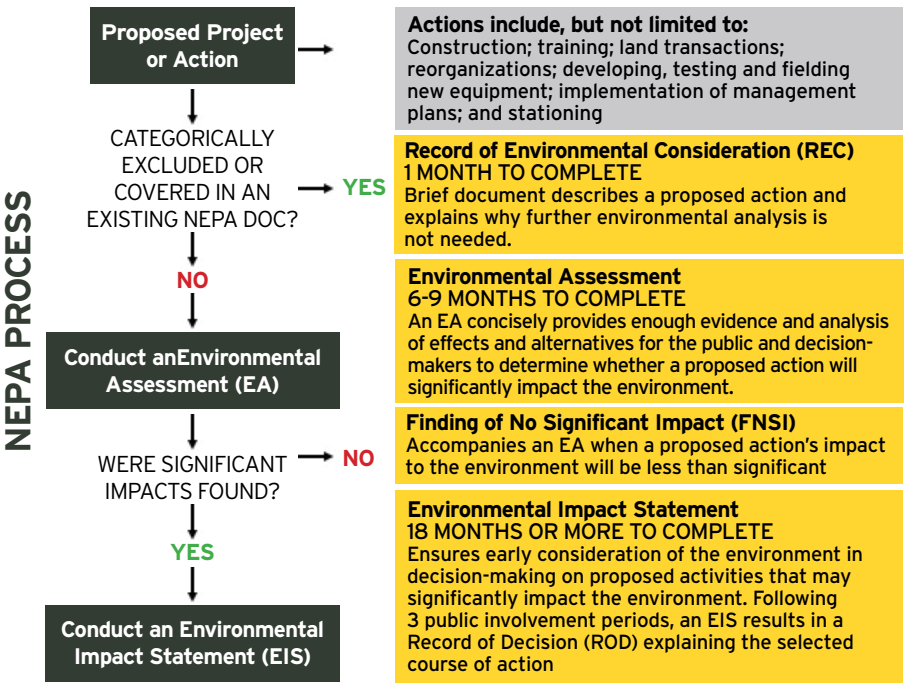
## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Garrison Environmental office, project proponent, and other affected stakeholders if applicable

**EXTERNAL:** Local/state/federal agencies, Tribes, public

## COMMANDER'S ROLE

- Ensure the NEPA process is initiated early in the planning phase and is embraced and effectively programmed by the proponent.
- Consider environmental impacts of alternatives before making a decision.
- Ensure adequate implementation of adopted mitigation measures.
- Sign the Finding of No Significant Impact (FNSI) or Finding of No Practicable Alternative (FONPA) document for the Environmental Assessment (EA).
- Recommend HQ IMCOM sign the Record of Decision (ROD) for an Environmental Impact Statement (EIS).
- Ensure public participation requirements are met; opportunities for public involvement are maximized.



# CLEAN AIR ACT (CAA)

## OVERVIEW

The CAA is the primary federal air management statute that incorporates regulations to improve our nation's air quality. Under the CAA, the U.S. Environmental Protection Agency (EPA) determines the levels of pollutants that are allowed in the air throughout the country. EPA air emission rules establish maximum concentrations for harmful air pollutants and restricts new activities where air quality already exceeds those levels. Installations must prepare early and fully to meet all CAA requirements and obtain the required permits. The federal regulations promulgated under the CAA are intended to protect our health from air pollution. These regulations limit air pollution from numerous sources found at Army installations. Actions that the CAA commonly requires at Army installations include: obtaining permits for new and existing air pollution sources, maintaining permits, ensuring that new construction meets requirements for permitting, and gathering data frequently from air pollution source operators as required according to the permit. CAA also covers handling and managing of asbestos containing materials.

### POTENTIAL INSTALLATION AIR POLLUTION SOURCES INCLUDE:

- Boilers/Heaters
- Emergency backup generators
- Peak Shaving Generators
- Painting of Material (tactical vehicles and aircraft)
- Refrigerants (Ozone Depleting Substances)
- Fueling operations, especially gasoline fueling
- Degreasing operations
- Training activities in the desert, especially vehicle maneuver training
- Firing ranges, firing points, impact areas, and Open Burning/Open Detonation (OB/OD)
- Incineration of waste
- Controlled burns (prescribed burning)
- Asbestos disturbed by demolition and renovation
- New construction

## LAWS AND REGULATIONS

- Clean Air Act Amendments of 1990 (40 CFR Parts 50-97)
- 40 CFR 763 Asbestos Hazard Emergency Response Act

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Garrison Environmental office, Directorate of Public Works, military units, real property office, Directorate of Logistics, installation tenants

**EXTERNAL:** Federal, state, and local agencies

## COMMANDER'S ROLE

- Obtain and sign permits and ensure submission of reports for emission sources as required by permit and applicable regulations.
- Support sustainability measures that reduce installation operation costs.
- Ensure that proponents of construction, demolition, and renovation projects thoroughly coordinate their actions with the Garrison Environmental office throughout the life of the project.
- Ensure that all installation activities and tenants provide the Garrison Environmental office material-use and other data required by Title V air pollution operating permit.
- Maintain programs to train air emissions management personnel.
- Notify IMCOM whenever an NOV is received in accordance with CCIR reporting timeline (IMCOM Reg 190-45-1).

**EXAMPLES OF NONCOMPLIANCE**
Failure to obtain pre-construction permit prior to beginning construction of new air pollution source

**LAW**
CAA

**IMPACT**

**EXAMPLES OF NONCOMPLIANCE**
Failure to test generator engine emissions prior to beginning operation or changing generator purpose from emergency to peak shaving or other non-emergency

**LAW**
CAA

**IMPACT**

# EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA)

## OVERVIEW

EPCRA places emergency planning and community right-to-know requirements on federal, state, and local governments, Tribes, and industry under Title III of the Superfund Amendments and Reauthorization Act of 1986. It was created to help communities better plan for emergencies involving hazardous substances.

Key provisions of EPCRA include emergency planning, emergency notification, community right-to-know requirements, and the Toxics Release Inventory (TRI). Installations are required by law to notify regulators and the public of on-post hazardous material use, storage, or spills. Ensuring proper notification, handling, and response related to hazardous materials protects the community and prevents restrictions that may impact readiness and mission success.

## LAWS AND REGULATIONS

- The Emergency Planning and Community Right-to-Know Act (40 CFR Parts 300, 350, 355, 370 and 372)

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Garrison Environmental office, fire department, Range Control, installation tenants

**EXTERNAL:** State Emergency Response Commission (SERC), Local Emergency Planning Committee (LEPC), fire department

## COMMANDER'S ROLE

- Designate an EPCRA/TRI coordinator to ensure all installation reporting requirements are met.
- Ensure annual TRI report is prepared and submitted recording the total annual release and off-site transfers of toxic chemicals including munitions from demilitarization activities.

**EXAMPLES OF NONCOMPLIANCE**
Not submitting TRI report (if required)

**LAW**
EPCRA

**IMPACT**

## OVERVIEW

The Army is responsible for protecting citizens from hazards resulting from installation activities, including noise. The primary strategy for protecting communities and installation mission from noise impacts is long-range land use planning. The Installation Compatible Use Zone (ICUZ) program is the primary mechanism for implementing a noise program at the installation level.

The ICUZ program promotes compatibility between the activities and operations within the installation, and between the activities and operations of the installation and neighboring communities. The ICUZ promotes compatibility by planning to execute mission requirements in areas that minimize the noise impacts outside the fence line whenever feasible.

## LAWS AND REGULATIONS

- Noise Pollution and Abatement Act of 1970
- Noise Control Act of 1972
- Quiet Communities Act of 1978
- DoDI 4715.13 DoD Noise Program
- AR 200-1 Chapter 14-Operational Noise

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Airfield operations, Range Control, military components, installation tenants, Garrison Environmental office, U.S. Army Public Health Center (USAPHC), Public Affairs Office (PAO)

**EXTERNAL:** Local community

## COMMANDER'S ROLE

- Ensure noise zone maps for the installation's current and future peacetime activities are developed.
- Support local and state agencies in developing land-use plans.
- Maintain efficient, community-friendly noise complaint procedures.
- Address complaints from the local community.
- Consider using ACUB program if it will restore or maintain an unrestricted training environment.

# HAZARDOUS MATERIAL (HM) MANAGEMENT

## OVERVIEW

The pervasive nature of hazardous material in Army operations, from facility and vehicle maintenance to training and medical facilities, requires Army units throughout the installation to identify and manage HM. The core objective of HM management is to protect human health and the environment while improving logistics and operational mission performance by controlling and reducing the acquisition, use, storage, and transport and disposal of HM.

Installations must develop an effective Hazardous Material Management Program (HMMP) and implement Department of the Army Pamphlet (DA PAM) 710-7 to control HM that might pose a risk to human health or the environment. The commander chairs the HMMP committee and has final decision authority for all HM entering the installation.

## LAWS AND REGULATIONS

- DA PAM 710-7 Hazardous Material Management Program
- Pollution Prevention Act
- AR 700-141 Hazardous Material Information Resource System
- Occupational Safety and Health Act
- Comprehensive Environmental Response, Compensation, and Liability Act
- AR 200-1 Environmental Protection and Enhancement
- Resource Conservation and Recovery Act Subtitle D

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Department of Public Works (DPW) Environmental, activity tenants (AAFES, DeCA, DoDEA, MEDCOM, MWR), Safety Office, Contracting, Logistic Readiness Centers (LRC), Emergency Services, Government Credit Card auditors, USAEC, G4

**EXTERNAL:** Public; federal, state, and local regulators

**EXAMPLES OF NONCOMPLIANCE**
Failure to notify reportable quantity releases of hazardous substances

**LAW**
CERCLA

**IMPACT**

## COMMANDER'S ROLE

- Ensure development and implementation of an effective HMMP.
- Appoints an HMMP committee to develop and maintain centralized HMMP policy and oversee the HMMP (can use EQCC as an alternative). Chair the HMMP committee.
- Ensure establishment of a written Hazard Communication Program and use of safety data sheets (SDS).
- Establish procedures to ensure compliance with applicable HM regulations, guidance, and procedures to include reporting and spill response.
- Avoid HM procurement costs by reducing the installation's HM inventory and proper shelf-life management.
- Ensure all personnel handling HM are properly trained in the use of potential hazards of such materials.
- Work with Defense Logistics Agency Disposition Services (DLADS) to determine markets and recycling opportunities for materials and wastes.
- Approve, or delegate an individual to approve, use of Government Purchase Cards (GPC) to purchase HM on a case-by-case basis.

# HAZARDOUS WASTE MANAGEMENT (HW)

## OVERVIEW

The cornerstone of effective HW management is understanding what constitutes an HW under the Resource Conservation and Recovery Act (RCRA). Hazardous waste is a solid waste, which because of its quantity, characteristics, and/or listing, can pose a substantial hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed. The fundamental task for an installation, and one that is frequently incorrectly done, is to determine which of its waste streams contain HW. Hazardous waste generators are responsible for cradle-to-grave management of HW from generation to the final disposal of the waste stream. RCRA is administered by states (except Alaska and Iowa) and details exact requirements for generators and transporters of HW and for HW treatment storage and disposal facilities.

The amounts and types of HW generated affect the degree to which an installation is regulated and the associated compliance requirements. An objective is to minimize the types and quantities of HW generated to be able to operate under exclusions or as a universal waste, without a need for a permit, and to minimize transport, treatment, and disposal costs. Some installations maintain RCRA-permitted HW storage facilities and/or Subpart X permits for OB/OD ranges. RCRA noncompliance can result in both civil and criminal penalties directly to responsible individuals.

## LAWS AND REGULATIONS

- Resource Conservation and Recovery Act (Subtitle C)
- Federal Facility Compliance Act
- AR 200-1 Environmental Protection and Enhancement

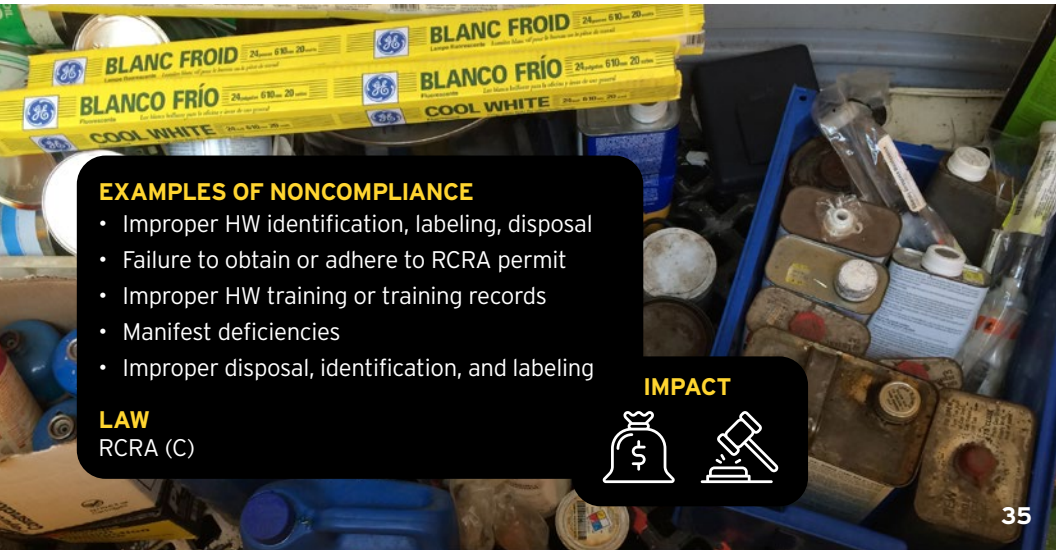
## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Garrison Environmental office, installation fire department, Unit Environmental Compliance Officers, Health and Safety, Contracting, Emergency Services, AAFES, DeCA, DoDEA, MWR, MEDCOM

**EXTERNAL:** Federal, state, and local regulators

## COMMANDER'S ROLE

- Ensure installation remains compliant with all applicable HW environmental laws and regulations.
- Sign applicable/necessary RCRA permit applications and/or NOVs, compliance agreements, and consent orders for the installation/ supported facilities as facility "owner."
- Work with DLADS for HW manifesting to a treatment, storage, and disposal facility and to determine markets for materials and wastes.
- Maintain responsibility for HW to include implementation of a hazardous waste management plan for all installation activities, including tenants and sub-installations.
- Use the installation Environmental Quality Control Committee (EQCC) to promote progress in meeting HW reduction and to support pollution prevention goals.
- Ensure that non-DoD HM is not stored, treated, or disposed of on the installation unless approved by higher authority and any contract, lease, or agreement with non-DoD tenants holds the Army harmless. Commander signs permit application as owner and the tenant signs as operator.
- Approve HW disposal contracts.
- Authorize appropriately trained individuals to sign HW manifests.
- Before committing the Army for future costs related to a RCRA permit for HW generation, consider all other options.
- Notify IMCOM whenever an NOV is received in accordance with CCIR reporting timeline (IMCOM Reg 190-45-1).




**EXAMPLES OF NONCOMPLIANCE**

- Improper HW identification, labeling, disposal
- Failure to obtain or adhere to RCRA permit
- Improper HW training or training records
- Manifest deficiencies
- Improper disposal, identification, and labeling

**LAW**
RCRA (C)

**IMPACT**

# SOLID WASTE MANAGEMENT

## OVERVIEW

Solid waste is any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility, and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities. Integrated Solid Waste Management (ISWM) is a comprehensive approach to managing nonhazardous solid waste by source reduction, recycling, composting, combustion with energy recovery, and land disposal programs. Through ISWM, the Army seeks to determine the most cost effective, energy-efficient, least-polluting ways to deal with the various segments of its solid waste streams. ISWM involves evaluating local needs and conditions and then selecting and combining the most appropriate waste management activities for those conditions.

Some installations still operate permitted solid waste landfills and transfer stations. The Army Net Zero Waste initiative introduced in 2010 seeks to make installations net zero generation in solid waste by reducing, reusing, and recovering waste streams, converting them to valuable, usable resources, and disposal of no solid waste in landfills. Qualified Recycling Programs allow retention of certain commodity sales proceeds to fund pollution prevention, energy conservation, occupational safety and health activities, and morale, welfare and recreation projects.

## LAWS AND REGULATIONS

- Resource Conservation and Recovery (Subtitle D)
- Solid Waste Disposal Act
- DoDI 4715.23 Integrated Recycling and Solid Waste Management
- AR 200-1 Environmental Quality Protection and Enhancement
- AR 420-1 Army Facilities Management

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Facilities Management Office, Garrison Environmental office, activity tenants, DLADS, Contracting, QRP manager, DPW, Preventive Medicine

**EXTERNAL:** Federal, state, and local regulators, buyers of recyclable materials

## COMMANDER'S ROLE

- Ensure there is a functional organizational structure to plan, execute, and monitor the solid waste program to ensure the installation remains in compliance with solid waste laws and regulations.
- Provide command emphasis on cumulative solid waste reduction, materials reuse, recycling, affirmative procurement, and composting.
- If the program is economically viable, ensure proceeds from the Qualified Recycling Program (QRP) are used in accordance with DoDI 4715.23. Designate a QRP manager, establish a QRP committee, and designate in writing personnel authorized to conduct QRP direct sales (if the installation has been given authority to do so).
- Ensure the ISWMP is current and implemented.
- Sign RCRA-D permit requests.
- Support waste diversion mandates and contract language inclusion for waste diversion.


**EXAMPLES OF NONCOMPLIANCE**
Improper waste identification
abandonment, operating without permit

**LAW**
RCRA (D)

**IMPACT**

# SPILL PREVENTION, CONTROLS, AND COUNTERMEASURE (SPCC) PROGRAM

## OVERVIEW

Oil spills occurring on an installation can result in work/training delays and stoppages, response costs and fines, and impacts to mission success. Installations must comply with the SPCC Rule, which establishes procedures, methods, equipment, and other requirements to prevent the discharge of oil, including animal and vegetable oils. Installations where the SPCC Rule applies must prepare/implement an SPCC Plan for a comprehensive spill prevention program addressing all relevant installation spill prevention, controls, and countermeasures. The Commander commits resources to implement the program and minimize the potential for discharges.

### SPCC MANAGEMENT ACTIVITIES

- Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge
- Conduct SPCC Rule required inspections/tests in accordance with written procedures developed by a certifying engineer
- Ensure personnel are available and adequately trained to prevent discharges and to follow discharge procedure protocols in the event of a spill

## LAWS AND REGULATIONS

- Resource Conservation and Recovery Act
- Clean Water Act
- SPCC Rule

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Facilities Management Office, Garrison Environmental office, installation fire department, Real Property Office, DLADS

**EXTERNAL:** Federal, state, and local regulators

## COMMANDER'S ROLE

- Ensure compliance and test SPCC plans.
- Consult with the installation PAO concerning potential community reaction to spills.
- Budget for resources needed for emergency response.
- Determine whether the facility is able to respond appropriately to off-post spills.
- Make sure appropriate authorities are advised of reportable releases.
- Appoint an Installation Response Team (IRT).
- Approve the SPCC for areas subject to the Clean Water Act.
- Designate, in writing, a qualified On-Scene Coordinator (OSC) responsible for executing spill response.
- Immediately notify IMCOM if a spill occurs.


**EXAMPLES OF NONCOMPLIANCE**
Unreported release of "reportable quantity"

**LAW**
RCRA

**IMPACT**

# STORAGE TANK MANAGEMENT

## OVERVIEW

Storage tanks (ST) include both above-ground tanks (ASTs), and underground, or partially-underground storage tanks (USTs). A storage tank system includes the storage or treatment tank and ancillary equipment, in addition to the containment and monitoring systems. Storage tanks generally contain hazardous material, hazardous waste, or petroleum substances. A leaking ST can result in petroleum or another hazardous substance contaminating soil and groundwater, potentially impacting human health, safety, and the environment. This can create health and environmental risks including the potential for fire and explosion. Tests over the years show about 25% of Army STs or their pipes have had releases. Contents of storage tanks may require reporting under the EPCRA program.

### POSSIBLE INSTALLATION ST LOCATIONS INCLUDE

- AAFES gas stations and other fuel points
- Airfield operations
- Motor pools
- Critical infrastructure sites

### STORAGE TANK MANAGEMENT ACTIVITIES

- Follow operating requirements and technical standards for tank design, installation, and operations
- Conduct release detection monitoring and respond accordingly
- Implement spill and overflow controls
- Conduct tank installations, upgrades, and closures
- Perform internal inspections of tank operations, installation, and removals
- Implement corrective actions for operational deviations and confirmed releases

## LAWS AND REGULATIONS

- Resource Conservation and Recovery Act (42 USC 6901 - 40 CFR 280 (USTs) )
- Clean Water Act – 33 USC 1251 - 40 CFR 112 (POL Storage Tanks)

- Resource Conservation and Recovery Act ( 42 USC 6901 - 40 CFR 279 Subpart C (Used Oil Tanks) )
- Resource Conservation and Recovery Act (42 USC 6901 - 40 CFR 261 Subpart J (Haz Waste Tanks) )
- Applicable State Regulations (Administrative Codes)
- AR 200-1 Environmental Protection and Enhancement

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Facilities Management Office, Garrison Environmental office, installation fire department, Real Property Office, installation tenants, contractors, USAEC, and lessees performing functions on real property under jurisdiction of the Department of the Army (AAFES, DeCA, LRC, etc.)

**EXTERNAL:** Federal, state, and local regulators, other DoD oversight components

## COMMANDER'S ROLE

- Ensure that ST support activities support military training and readiness operations, enhance mission accomplishment, and are conducted in a manner conducive to environmental stewardship.
- Ensure the appropriate agencies and HQDA are notified of existing or new USTs and ASTs.
- Permanently close or remove all abandoned tanks within one year of temporary closure.
- Facilitate the investigation, negotiation, and resolution of ENFs/ NOVs and submit documentation through appropriate chain of command.


**EXAMPLES OF NONCOMPLIANCE**
- Failure to detect leaks or spills
- Improper installation, operation, maintenance

**LAW**
RCRA-I

**IMPACT**

# TOXIC SUBSTANCES CONTROL ACT (TSCA)

## OVERVIEW

The Toxic Substances Program manages asbestos, lead-based paint (LBP), and polychlorinated biphenyls (PCBs), regulated under TSCA. Harmful exposures to these substances can endanger the immediate or long-term health of Soldiers, their Families, and Civilians. Improper controls when remodeling, demolishing, or removing structures containing these toxic substances can result in exposures, work stoppage, and possible regulatory actions and fines.

## TSCA ACTIVITIES

### ASBESTOS

- Activity: Perform surveys (asbestos hazard risk assessments) for the presence of asbestos hazards, including ongoing monitoring, controls, and abatement in all installation facilities, including schools, day-care facilities, and housing constructed prior to 1990.

### LEAD-BASED PAINT

- Activity: Ensure the proper disposal of waste and debris (such as paint chips and painted building parts) from the demolition of World War II-era structures on Army installations
- Proponent: Public Works, Facilities, and Housing

### PCBs

- TSCA: leave them in place until operational, economic, or environmental considerations justify their removal
- Proponent: Public Works, Environmental

## LAWS AND REGULATIONS

- TSCA (40 CFR Parts 700 to 799)

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Facilities Management Office, Garrison Environmental office, installation fire department, installation personnel, Real Property Office

**EXTERNAL:** Federal, state, and local regulators

## COMMANDER'S ROLE

- Establish an installation asbestos management team.
- Support minimizing environmental releases and occupational and incidental exposures.
- Ensure risk assessments are performed in family housing and child-occupied facilities to identify lead hazards.
- Disclose to occupants, upon assignment of family housing, the known presence of lead-based hazards.
- Ensure all National Emission Standards for Hazardous Air Pollutants (NESHAP) notification requirements are met before beginning any demolition or renovation activities.
- Notify IMCOM whenever an NOV is received in accordance with CCIR reporting timeline (IMCOM Reg 190-45-1).

**EXAMPLES OF NONCOMPLIANCE**

- Failure to survey work sites for toxic substances
- Not ensuring proper disposal of toxic substance wastes and debris

**LAW**
TSCA

**IMPACT**

# WASTE WATER MANAGEMENT

## OVERVIEW

Installations generate waste water from sanitary uses, industrial processes, and storm water runoff. Adequate treatment of these waste streams maintains the quality of the water receiving the waste. Regulations implement the requirements of the CWA for discharges of pollutants into waters of the U.S. New, more stringent regulations require additional planning, treatment, monitoring, and investments to ensure compliance.

### WASTE WATER "DIRECT DISCHARGE" MANAGEMENT

- Direct discharges are discharges from discrete conveyances (single source) such as pipes, ditches, and sewers.
- National Pollutant Discharge Elimination System (NPDES) permits, issued by either EPA or authorized state, contain industry-specific, technology-based and/or water quality-based limits for discharges.
- Installations with federally owned treatment works or a single sewer system that transports all waste/storm water to a sewage treatment plant require an NPDES permit for discharges into U.S. waters.

### STORM WATER DISCHARGE MANAGEMENT

- There are three types of storm water permits:
  1. Multi-Sector General Permit (MSGP) (industrial facility storm water runoff)
  2. Municipal Separate Storm Sewer System Permit (MS4) (cantonment areas)
  3. Construction General Permit (CGP) (construction site runoff.
- The type of storm water NPDES permits required depends on installation activities.
- A storm water permit will require development and implementation of a storm water pollution prevention plan (SWPPP).
- Overseas commanders: Refer to the FGS or OEBGD.

## LAWS AND REGULATIONS

- Clean Water Act

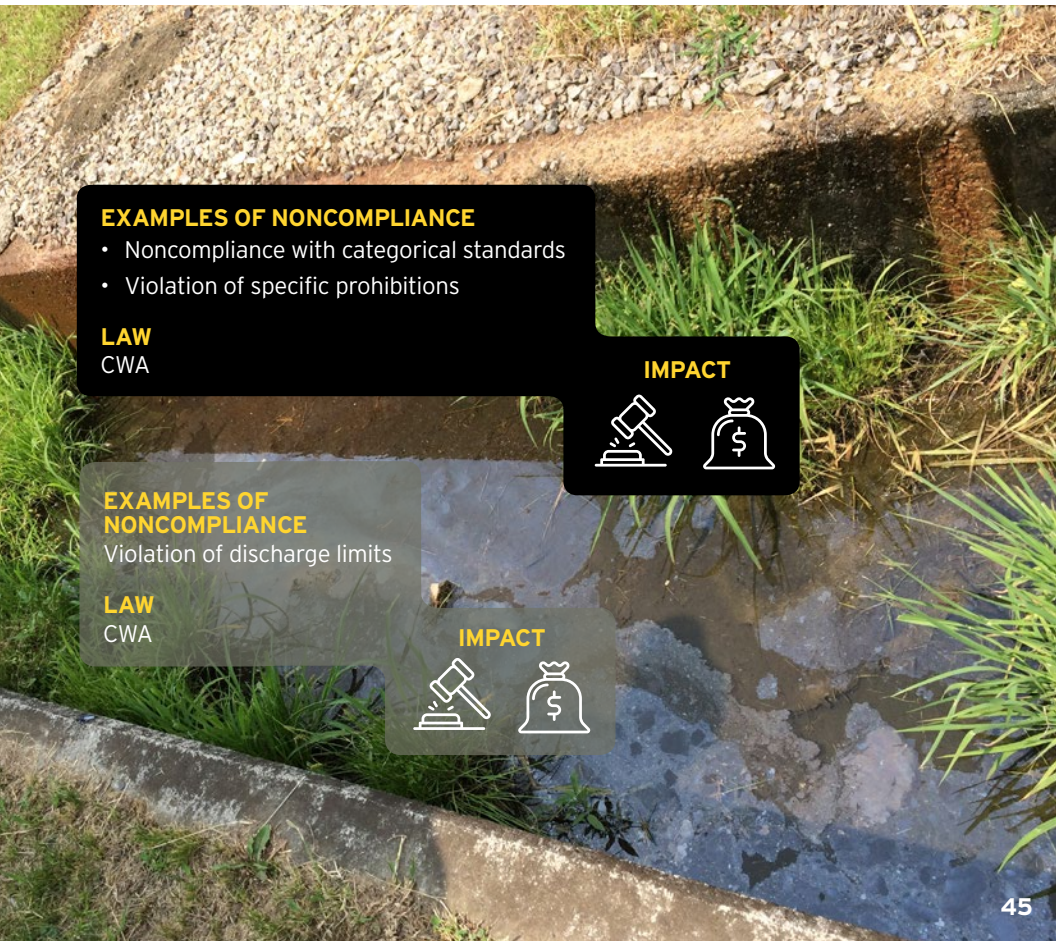
## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Facilities Management Office, Garrison Environmental office, installation personnel, Real Property Office

**EXTERNAL:** Federal, state, and local regulators

## COMMANDER'S ROLE

- Serve as principle executive official for any NPDES program permits.
- Delegate in writing who is responsible for the required reporting and plans (typically the DPW or Environmental Division Chief).
- Notify IMCOM when new permits are received or new regulations are proposed or issued that will require modification of existing treatment facilities.
- Notify IMCOM whenever an NOV is received in accordance with CCIR reporting timeline (IMCOM Reg 190-45-1).



# WATER QUALITY MANAGEMENT

## OVERVIEW

Installations must comply with Safe Drinking Water Act (SDWA) requirements, which apply to all public water systems, regardless of who controls them. Safe drinking water is a critical commodity Army installations must maintain to support readiness and the health and safety of Soldiers, their Families, and Civilians.

Besides natural pollutants, there are more than 60,000 man-made drinking water contaminants. These contaminants include chemicals used in Army operations as well as industry and agriculture. When improperly used or discarded, these chemicals can contaminate underground and surface sources of drinking water.

EPA has developed Maximum Contaminant Levels (MCLs) to protect consumers from effects of harmful contamination. Compliance with EPA MCLs is required by law and requires treatment, sampling, testing, regulatory reporting, record keeping, and public notification.

EPA also created secondary standards for contaminants that may cause cosmetic effects (skin and tooth discoloration) or aesthetic effects (taste or color). These standards are not enforceable unless adopted by the state.

## LAWS AND REGULATIONS

- Safe Drinking Water Act of 1974
- Lead Contamination Control Act of 1988

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Facilities Management Office, Garrison Environmental office, Water Quality Program Manager, Real Property Office, installation personnel, and on-base community

**EXTERNAL:** Federal, state, and local regulators

## COMMANDER'S ROLE

- Ensure adequate supplies of drinking water meeting all applicable federal and state standards are available.
- Maintain an active cross-connection control program as required by your state.
- Ensure appropriate protection of wellhead or source-water areas.
- Obtain permits for new or modified drinking water facilities.
- Notify IMCOM when new permits are received and when new regulations are proposed or issued that will require modification of existing treatment facilities.
- Notify customers and state and EPA regulators within 24 hours of violations in which short-term exposure could cause serious adverse health effects.
- Support water use reduction and Net-Zero goals.
- Approve quarterly drinking water report.
- Ensure production and distribution of annual Consumer Confidence Reports to customers, if applicable.
- Notify IMCOM whenever an NOV is received in accordance with CCIR reporting timeline (IMCOM Reg 190-45-1).

# POLLUTION PREVENTION (P2) PROGRAM

## OVERVIEW

P2 is a comprehensive initiative focusing on resource conservation, substituting hazardous materials with less or nonhazardous materials, reducing waste, recycling, and other preventative means to successfully and cost-effectively avoid, prevent, or reduce both pollution and compliance costs.

Major program areas are planning, hazardous waste reduction, solid waste reduction and diversion, air pollution reduction, water pollution reduction, and hazardous materials reduction.

### THE P2 PROGRAM HELPS INSTALLATIONS

- Reduce environmental compliance burden by minimizing the applicability of requirements imposed by environmental laws and regulations
- Reduce operational costs
- Reduce waste and the generation of pollution
- Reduce the cost of waste disposal

### POLLUTION PREVENTION ACTIVITIES INCLUDE

- Revising manufacturing, maintenance, or other business practices to reduce waste generation
- Amending technical documents to remove requirements for hazardous materials
- Recycling
- Reworking product designs
- Increasing energy efficiency and conserving materials
- Acquiring and using environmentally preferable products and services

## LAWS AND REGULATIONS

- Resource Conservation and Recovery Act
- Clean Air Act Amendment
- Emergency Planning and Community Right-to-Know Act
- Pollution Prevention Act of 1990

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** P2 Coordinator, steering and working groups

**EXTERNAL:** Public

## COMMANDER'S ROLE

- Establish a strong P2 program.
- Emphasize the P2 ethic across all organizations and echelons of the command/installation.
- Promote recycling/reuse programs and Green Procurement policies.
- Encourage the waste characterization of facilities to determine the sources, types, and amounts of waste generated, air pollutants released, solid waste disposed, and waste water discharged.
- Emphasize reduction of pollution sources by determining, via Pollution Prevention Opportunity Assessments, areas where material substitution, process changes or re-engineering can reduce hazardous materials before recycling, treatment, or disposal.
- Ensure an up-to-date installation P2 Plan is maintained.

# ARMY COMPATIBLE USE BUFFER (ACUB) PROGRAM

## OVERVIEW

Urban sprawl now encroaches on many military installations initially established in rural areas. Citizens' complaints about noise, dust, and smoke from training and testing activities can lead to restrictions and potentially impact readiness and mission accomplishment.

The ACUB program is one of several voluntary tools helping the Army reduce encroachment, bolster military installation resilience, and achieve greater training flexibility. ACUB partners receive financial support for land conservation, including prevention of urban development, threatened and endangered species (TES) and habitat protection, preservation of working lands, and climate resilience projects. Private landowners realize financial incentives, and often tax benefits, while preserving the land and its heritage for future generations.

### HOW ACUB FUNCTIONS

- Establishes agreements with non-federal governments and non-profit organizations (eligible entities or partners) to encumber off-post land that protects installations from urban development and species management requirements
- Produces agreements limiting encroachment and other constraints on military operations without the Army acquiring ownership of any new land
- Contributes Army and Secretary of Defense funds toward partner's purchase of easements or properties, preserving high-value habitat, and/or limiting incompatible development in the vicinity of installations

### FUNDING ELIGIBILITY

- Available to installations with an approved ACUB Plan.
- Includes Army installations within the United States, its territories, and protectorates.

## LAWS AND REGULATIONS

- 10 USC 2684a Agreements to Limit Encroachment and Other Constraints on Military Training, Testing, and Operations
- DoDI 4715.24, The Readiness and Environmental Protection Integration Program and Encroachment Management

- 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** ACUB partner, Installation ACUB POC (must be a Department of Army Civilian), Planning Installation Mission/Training/Planning stakeholders, USAEC, HQ IMCOM, IMCOM Directorates, and DCS G-9

**EXTERNAL:** Other government agencies, regulators and community

## COMMANDER'S ROLE

- Ensure manpower and resources are available to execute an effective strategic buffering program and prevent encroachment of mission capabilities and capacities.
- Designate an installation lead point of contact and ACUB team members, as appropriate, and ensure USAEC training requirements are met.
- Sign the ACUB proposal for submission to DCS G-9 for approval.
- Approve ACUB priority areas and provide input on parcel prioritization
- Participate in cyclical USAEC ACUB Program Management Review (PMR) alongside the installation ACUB Team and Partner(s).
- Provide endorsement of REPI Challenge funding proposals that have been developed by installation lead point of contact and Partner(s).

# CONSERVATION REIMBURSABLE AND FEE COLLECTION (CRFC)

## OVERVIEW

The Army's forestry, agricultural/grazing out-leasing, and hunting/fishing/trapping programs produce a number of benefits that help ensure the continued availability of Army training lands. CRFC programs:

- Promote biological diversity, wildlife habitat, air and water quality, soil conservation, watershed protection, and recreational opportunities
- Reduce wildfire risks by managing fire-prone forest/grassland and performing prescribed burns
- Reduce VENQ funding requirements by using forest product sales; agricultural out-lease; and hunting, fishing, and trapping fees to maintain training lands and roads on installation used for forest management
- Contribute 40% of net timber sales revenue to local counties to pay for public schools and roads
- Cost for land management and maintenance requirements are reduced through in-kind services implemented by lessees

### FORESTRY MANAGEMENT AND OUT-LEASE (CONUS ONLY)

Income can supplement Congressionally appropriated funds; however, because reimbursable funds are economically driven they should not be counted on to sustain training lands. Revenue generation is a by-product of supporting the installation mission; not a program driver.

## LAWS AND REGULATIONS

- 10 U.S. Code § 2665  Sale of Certain Interests in Land; Logs
- Sikes Act (16 USC 670a-670c, 74 Stat. 1052)
- DoDI 4715.03 Natural Resources Conservation Program
- AR 405-80 Management of Title and Granting Use of Real Property dated 10 Oct 07
- AR 405-90 Disposal of Real Estate, dated 10 Apr 98

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Installation Fish and Wildlife Programs; DPW Environmental Forest and Agricultural/Grazing Managers, USAEC,

USACE, MWR (where applicable)

**EXTERNAL:** Hunting and fishing clubs, forestry consumers, state forestry programs, state Fish and Wildlife, farmers and ranchers

## COMMANDER'S ROLE

- Ensure execution of forestry program in accordance with 10 U.S. Code 2665 requirements.
- Manage/approve hunting, fishing, and trapping fees per Sikes Act and DoDI 4715.03.
- Prioritize CRFC activities to support the mission; not solely to generate income.
- Approve annual reports of availability identifying area/volume of timber available for sale and land available for agricultural/grazing leases.
- Send annual reports to appropriate U.S. Army Corps of Engineer (USACE) district for planned timber sales or agriculture/grazing leases.
- Deposit/use fees pursuant to Sikes Act, and only on the installation where collected.
- Ensure that Army law enforcement personnel are trained in conservation law enforcement where appropriate.

# CULTURAL RESOURCES MANAGEMENT (CRM) PROGRAM

## OVERVIEW

The CRM program ensures compliance with federal and host nation laws and regulations regarding protection and preservation of cultural resources (e.g., historic properties, cultural items, archaeological resources, sacred sites, and archaeological collections). The Army uses a five-year plan called an Integrated Cultural Resources Management Plan (ICRMP) to manage its cultural resources program and implement compliance procedures. ICRMPs are required for all installations with cultural resource programs to identify and define components of CRM essential to long-range installation planning. The ICRMP synchronizes the installation's cultural resources program with ongoing mission activities; allows ready identification of potential conflicts between the installation's mission and its cultural resources; and identifies compliance actions necessary to keep mission-essential properties and acreage ready for use.

## LAWS AND REGULATIONS

- Archaeological Resources Protection Act of 1979
- National Historic Preservation Act of 1966
- Native American Graves Protection and Repatriation Act of 1990
- EO 13007, Indian Sacred Sites
- EO 13175, Consultation and Coordination with American Indian Tribal Governments
- DoDI 4710.02, DOD Interactions with federally Recognized Tribes
- DoDI 4710.03, Consultation with Native Hawaiian Organizations
- DoDI 4715.16, Cultural Resources Management

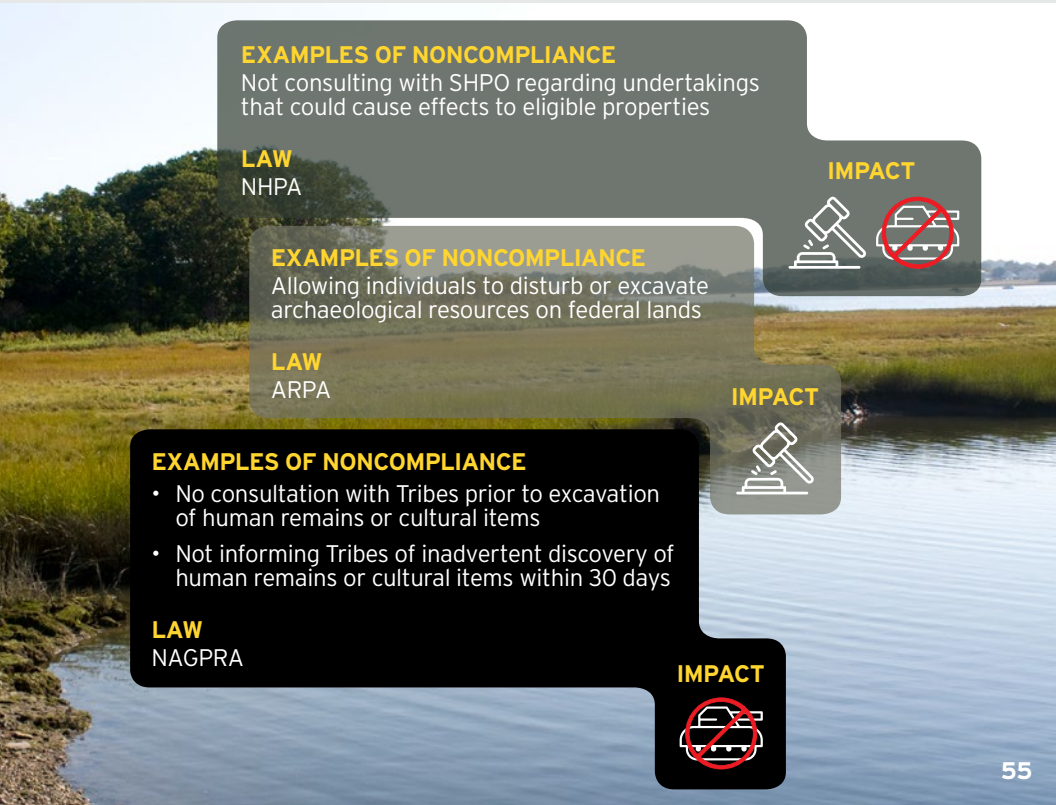
## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Cultural Resources Manager or Liaison for Native American Affairs

**EXTERNAL:** State Historic Preservation Office (SHPO), American Indian Tribes, Native Alaskans and Native Hawaiian organizations, Advisory Council on Historic Preservation (ACHP), National Park Service, public

## COMMANDER'S ROLE

- Designate qualified preservation expertise to develop/implement the ICRMP.
- Be aware of the nature and extent of known cultural resources.
- Establish government-to-government relations with federally recognized American Indian Tribes and Native Alaskans.
- Serve as the Federal Agency Official with responsibility for installation compliance with the NAGPRA.
- Coordinate planning processes with interested American Indian Tribes and protect access to sacred sites on installation lands (when such access has no significant impact on the mission).
- Verify coordination of the ICRMP with master plans and operations and approve/sign the plan.
- Consider the effects of training and other activities on historic and prehistoric resources.
- Plan cultural resources management activities in ways that avoid or minimize effects on operational activities.
- Ensure that Army law enforcement personnel are trained in conservation law enforcement where appropriate.



# INTEGRATED PEST MANAGEMENT (IPM) PROGRAM

## OVERVIEW

The IPM program uses a sustainable approach to managing pests to maintain training lands, ranges, and facilities that support readiness with minimal impact to the environment. The program combines biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks (Section 136, Title 7 USC).

Pests are everywhere and can make Soldiers, their Families, and pets sick, damage buildings, destroy food, and impact training. The overall goal of the Army's IPM program is to protect human health, property, and natural resources from adverse impacts of pests such as weeds, insects, mold, fungus, rodents, and other vertebrates (i.e., feral animals).

### ARMY IPM POLICY IS TO

- Protect real property and the health of Soldiers, Civilians, and Families from pests through use of IPM strategies
- Reduce the use of chemical pesticides
- Reduce environmental risks from pesticides through proper storage, handling, application, and product disposal

### IPM ACTIVITIES

- Properly plan to accomplish the program.
- Remove food, water, and shelter that can promote, sustain, or harbor pest populations.
- Use pesticides safely to control pests.
- Ensure applicators are certified and trained to safely control pests.
- Receive approval of all pesticides applied by in-house staff or contract applicators from the Command IPM Consultant at USAEC.

## LAWS AND REGULATIONS

- Federal Insecticide, Fungicide, and Rodenticide Act of 1972
- DoD Instruction 4150.07, DoD Pest Management Program
- DoD Manual 4150.07, Volume 1, DoD Pest Management Training and Certification Program: The DoD Plan for Pesticide Applicators
- DoD Manual 4150.07, Volume 2, DoD Pest Management Program Elements and Implementation: Pesticide Applicator Training and Certification Program

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** DPW, installation IPM coordinator, major on-post pesticides/herbicides users and managers, installation personnel, USAEC

**EXTERNAL:** Federal and state regulators

## COMMANDER'S ROLE

- Ensure the provision of adequate funds and staffing to support installation pest management program requirements.
- Approve IPM Plans and ensure their inclusion in the installation master planning process and NEPA requirements.
- Ensure the pest management requirements of major assigned units, tenants, and supported activities meet Army program requirements.
- Designate a qualified IPM Coordinator as the primary staff proponent for the installation pest management program.

# NATURAL RESOURCES PROGRAM

## OVERVIEW

The Natural Resources Program helps ensure continued use of Army lands supporting readiness and mission accomplishment by protecting/preserving species on installations. It allows natural resources management to provide the mission landscape for future training and prevents mission disruptions, delays, or in some cases, shutdown due to failure to anticipate potential impacts to Threatened and Endangered Species (TES), their designated critical habitat, or other sensitive natural resources.

The program manager ensures timely consultation with and involvement of U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), states' Department of Natural Resources, or other agencies like the USACE.

### NATURAL RESOURCES MANAGEMENT ACTIVITIES

- Protect TES and consult on actions which may affect them as required by the Endangered Species Act (ESA)
- Develop, maintain, and implement an Integrated Natural Resources Management Plan (INRMP). Plan is required to be reviewed annually and re-accomplished every 5 years in coordination with state and USFWS and/or NMFS
- Provide for conservation and rehabilitation of natural resources on Army lands to include fish and wildlife management

## LAWS AND REGULATIONS

- Endangered Species Act of 1973
- Sikes Act as amended in 1997
- Migratory Bird Treaty Act
- Bald and Golden Eagle Protection Act
- Clean Water Act
- DoDI 4715.03, Natural Resources Conservation Program
- DoDM 4715.03, Integrated Natural Resources Management Plan Implementation Manual

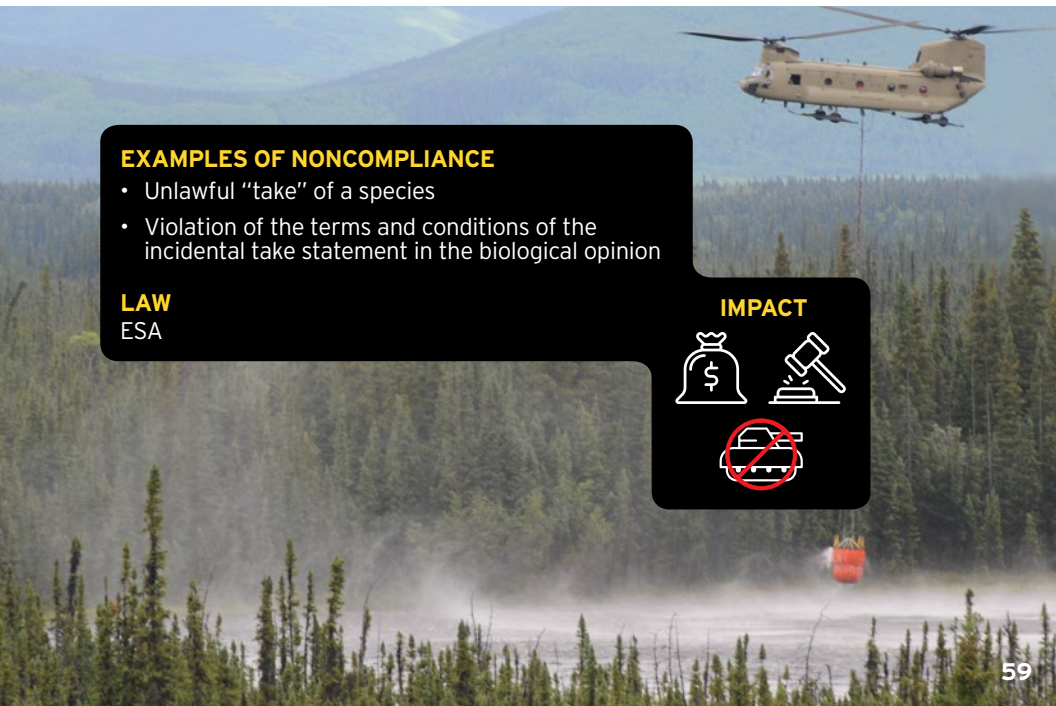
## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Range Control, Garrison Environmental office, Office of Counsel, DES fire and police, master planning, USAEC, USACE

**EXTERNAL:** Federal and state regulators, USFWS/NMFS, local community

## COMMANDER'S ROLE

- Ensure coordination among installation stakeholders to integrate natural resources conservation with mission activities and plan land use to avoid adverse effects on TES.
- Facilitate biological assessments for major construction projects and other activities, such as military training, to assess the effects on listed species and their habitats.
- Work closely with the USFWS and NMFS in planning installation activities to initiate formal consultation for activities that may affect listed species.
- Integrate Endangered Species Management Components (ESMC) within INRMP to manage endangered species and ensure adequate funds and personnel are provided to carry them out.
- Ensure installation compliance with INRMPs is monitored and progress is made toward conservation goals through internal and external assessments and annual review by the EQCC.
- Approve/sign ESA Biological Assessments (BA) following IMCOM/ USAEC review.
- Approve the INRMP.



# ENVIRONMENTAL CLEANUP PROGRAM

## OVERVIEW

Past hazardous materials handling practices resulted in soil, or surface and groundwater contamination at thousands of sites on Army installations. Contaminated sites pose potential risk to human health and the environment and must be properly addressed to remove or prevent unacceptable risk. Failing to comply with legal requirements can result in enforcement actions and fines by regulatory agencies.

## CLEANUP IS EXECUTED BY TWO PROGRAMS

### DEFENSE ENVIRONMENTAL RESTORATION PROGRAM (DERP)

- DERP only covers those sites, located in the United States and its territories, included in the following programs:
  - » The Installation Resource Program (IRP) identifies, investigates, and cleans up releases of hazardous substances and contaminants. The Military Munitions Response Program (MMRP) addresses non-operational range lands potentially containing unexploded ordnance (UXO), discarded military munitions (DMM), or munitions constituents (MC).
  - » DERP also includes the costs associated with spills beyond the year of execution, but not the initial response.

### COMPLIANCE CLEANUP (CC) PROGRAM

- Covers cleanup activities ineligible for DERP. Mainly addresses cleanup at overseas installations and mandated cleanups under a federal or state law that are not eligible for DERP

## LAWS AND REGULATIONS

- Comprehensive Environmental Response, Compensation, and Liability Act of 1982
- Resource Conservation and Recovery Act
- National Oil and Hazardous Substances Pollution Contingency Plan

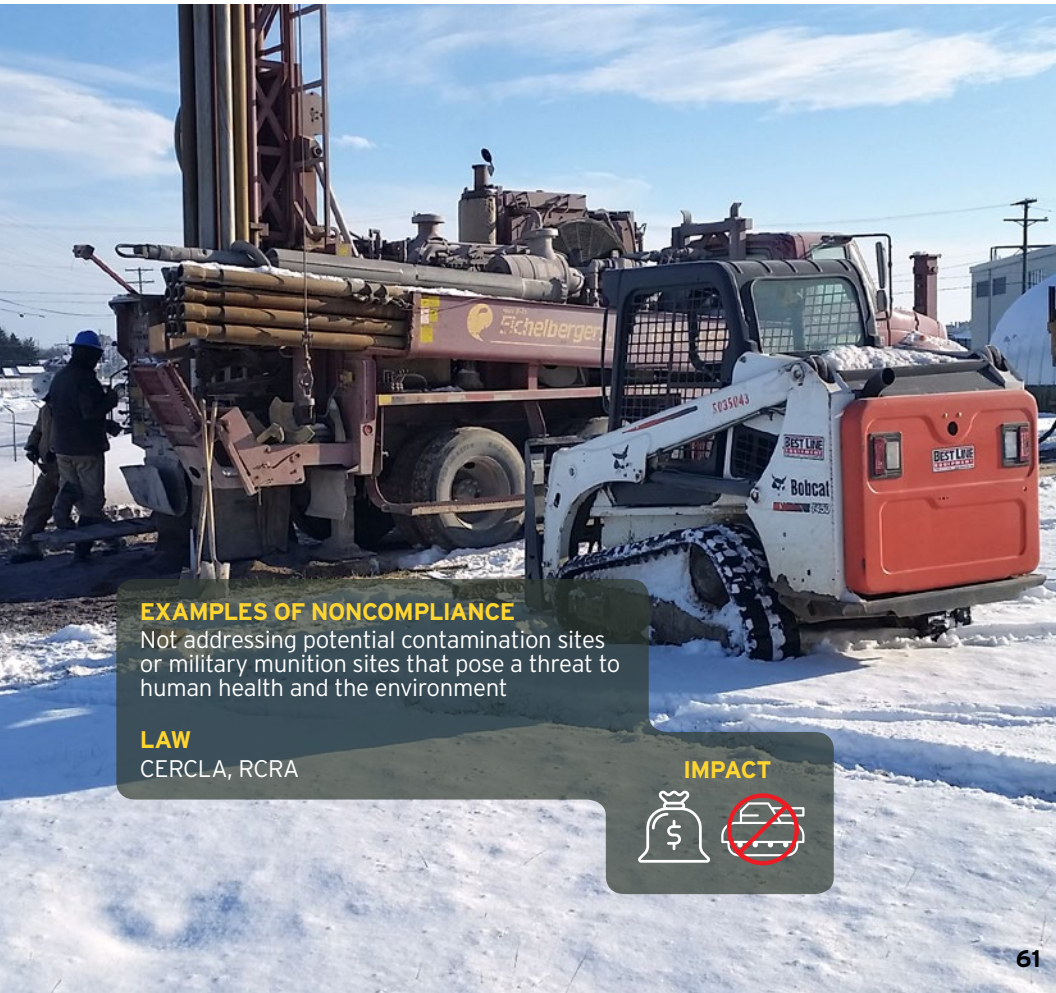
## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** USAEC, IMCOM G4 Environmental Division, Garrison Directorate Staff, Garrison environmental staff, Garrison tenants

**EXTERNAL:** EPA, State regulators, Public/Private land owners, community members

## COMMANDER'S ROLE

- Approve decision documents for cleanup actions as appropriate.
- Ensure Cost-to-Complete (CTC) estimates are accurately presented and properly supported.
- Approve annual Installation Action Plan (IAP) detailing cleanup program actions.
- Support public participation requirements to include serving as or designating the Army Restoration Advisory Board (RAB) co-chair.
- Approve off-site data collection and any off-post monitoring.
- Notify higher authorities prior to initiating any off-site response actions.
- Ensure discovered releases are appropriately reported.
- Maintain a public affairs program that encourages public involvement.




**EXAMPLES OF NONCOMPLIANCE**
Not addressing potential contamination sites or military munition sites that pose a threat to human health and the environment

**LAW**
CERCLA, RCRA

**IMPACT**

# ENVIRONMENTAL PERFORMANCE ASSESSMENT SYSTEM (EPAS)

## OVERVIEW

Environmental Performance Assessment System (EPAS) is a program that provides Army commanders a comprehensive look at environmental risks associated with their facilities and missions using both internal and external assessments. Internal assessments are conducted annually, at a minimum, by installation personnel as part of their regular management, checking, and corrective action functions, unless an external assessment is conducted that calendar year. The U.S. Army Environmental Command (USAEC) executes the external EPAS program at all U.S. Army Installation Management Command (IMCOM) installations worldwide on a three-year cycle or as warranted based on risk, which may be more or less frequently.

The EPAS program assesses the compliance aspects of a garrison's environmental program to identify and mitigate environmental liabilities and risks to training and operations from regulatory noncompliance. By reducing liabilities proactively, the Army avoids potential fines and regulatory distractions, allowing garrisons to focus fully on accomplishing the Army mission.

### HOW EPAS OPERATES

The EPAS program is the Army's overall system for monitoring installation-level environmental performance.

- Installations are required to conduct annual internal fence-line-to-fence-line assessments of all environmental media.
- The results and the status of closure on findings should be reported to the commander during the quarterly EQCC meeting.
- External EPAS are conducted to provide an objective, fence-line-to-fence-line assessment of Army operations and activities.
- The assessment gives commanders a comprehensive look at the environmental risks associated with their facilities and mission.
- A team comprised of USAEC/installation subject-matter experts normally spends a week visiting the installation to ensure operations meet compliance requirements.
- The team reviews and finalizes the findings within approximately 45 days.
- USAEC is available, on request, to assist with corrective actions of any deficiencies.

## LAWS AND REGULATIONS

- AR 200-1 Environmental Protection and Enhancement

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** USAEC, Environmental Division, Garrison Directorate Staff, Garrison tenants

**EXTERNAL:** Not required

## COMMANDER'S ROLE

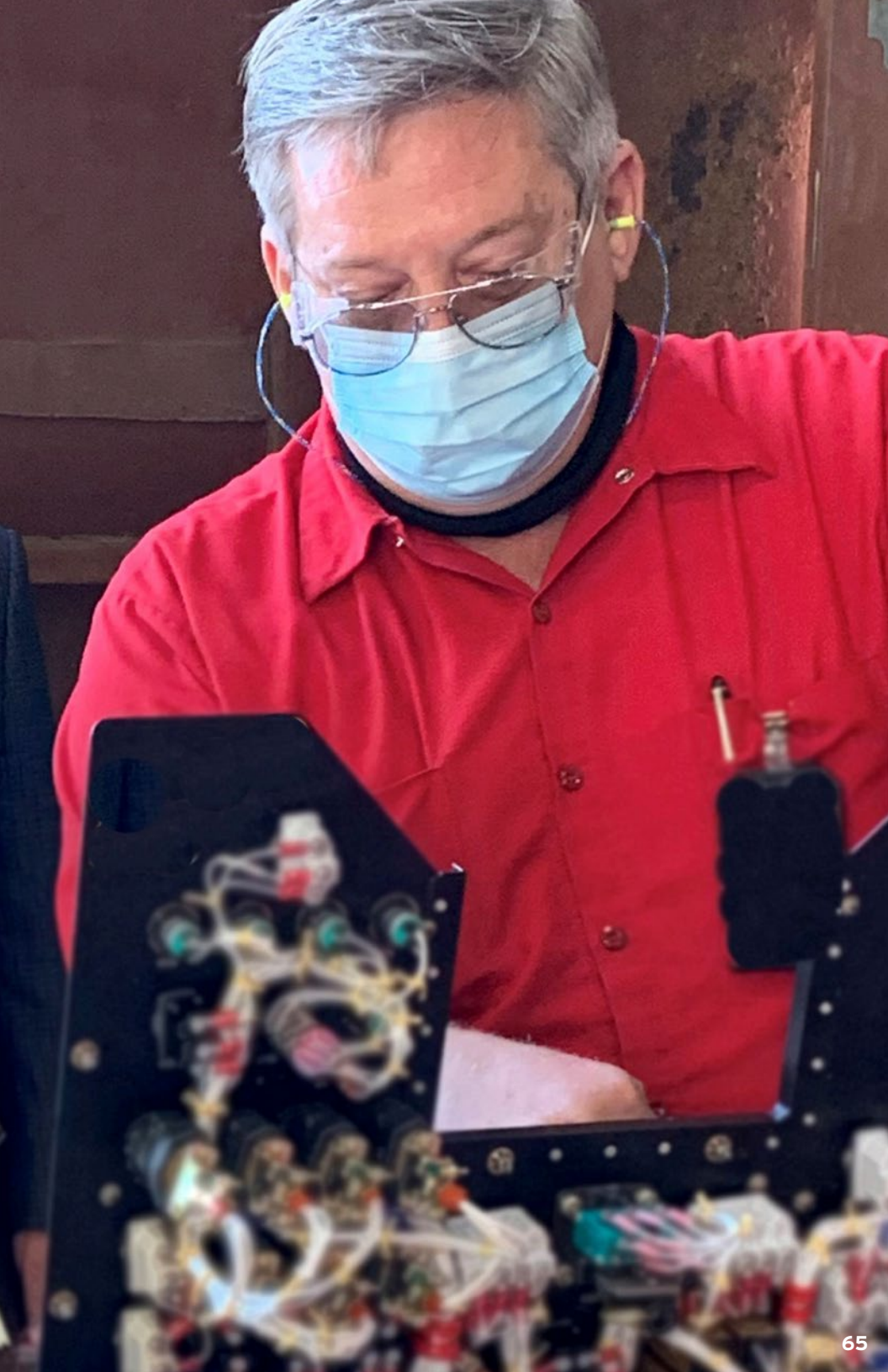
- Ensure annual internal EPAS audit is accomplished to include tenants.
- Promote garrison-wide cooperation/assistance with EPAS team.
- Provide resources/emphasis for Corrective Actions identified during assessment.
- Use quarterly EQCC meetings to ensure Corrective Actions are addressed in accordance with Corrective Action Processes/Plan.
- Maintain an inventory of compliance sites and activities with potential to impact the environment.
- Communicate environmental risk across the garrison.

# ORGANIC INDUSTRIAL BASE

## OVERVIEW

The Army's Organic Industrial Base (OIB) includes 23 depots, arsenals and ammunition plants managed by Army Material Command that manufacture and reset Army equipment generating readiness and operational capability throughout Army formations. The OIB exists to maintain unit readiness across the force and gives the Army the ability to surge in support of contingencies.

- OIB operational funding is not appropriated by Congress.
- Income is derived by executing customer orders and receiving payment for expenses incurred to provide products and services.
- Each activity must establish rates to recover costs and maintain Army Working Capital Funds (AWCF) cash balance.
- Increases in workload volume reduces indirect costs and decreases rates.
- The AWCF is required to break even during budget development and maintain 7-10 days of cash.
- AWCF provides flexibility, financing mechanism, and cost visibility.



# ENVIRONMENTAL PROGRAM MANAGEMENT AND FUNDING

## OVERVIEW

The AEP receives funding and Army-leadership interest because of legal obligations and the Army's commitment to conduct peacetime and wartime military training in a manner protective of human health and the environment.

The AEP focus is on addressing critical environmental needs. Critical funding requirements are those actions needed to attain and sustain compliance with federal, state, and local laws and regulations, and equivalent country-specific FGS.

### THE ENVIRONMENTAL MANAGEMENT DECISION EVALUATION PACKAGES (MDEPS) ARE ENVR AND VENQ.

- MDEP VENQ provides program funds for installation environmental support.
- MDEP ENVR provides Environmental Cleanup program funds and related support and initiatives for all Army installations.
- Not all environmental activities are eligible for VENQ Program funds.

### WHAT DETERMINES FUNDING

- Executive Orders (EO), federal, state, regional, and local statutory/regulatory requirements, equivalent country-specific FGS, and legally binding international agreements
- Statutorily mandated or authorized documents such as permits, judicial decrees, consent orders, consent or compliance agreements
- Regulatory or statutory requirements to achieve reduction of risk to human health and the environment from environmental contamination
- The proponent usually funds environmentally related activities that are an essential and inherent part of operational business processes or necessary to maintain infrastructure that physically supports operational training activities.
- Requirements properly chargeable to other programs/MDEPs must not be funded with environmental funds. These include:
  - » Facility Sustainment, Restoration, and Modernization (QDPW)
  - » Real Property Services (QDPW)
  - » Energy and Water Conservation Projects (QUTM)
  - » Logistics (QLOG)

  - » Integrated Training Area Management (ITAM)
  - » Military Construction (MILCON associated MDEPs)
- Not all requirements identified in the OEBGD and subsequent country-specific FGS can be funded by the environmental programs. The FGS establish the standards and criteria with which DoD installations must comply; the FGS do not serve as a funding policy document.
- Base operational funds are used for ENF/NOV fines and permits associated with noncompliance.

## LAWS AND REGULATIONS

- AR 200-1 Environmental Protection and Enhancement

## STAKEHOLDERS TO ACTIVELY ENGAGE WITH

**INTERNAL:** Garrison Directorate Staff, IMCOM G4 Environmental Division, USAEC

**EXTERNAL:** As required

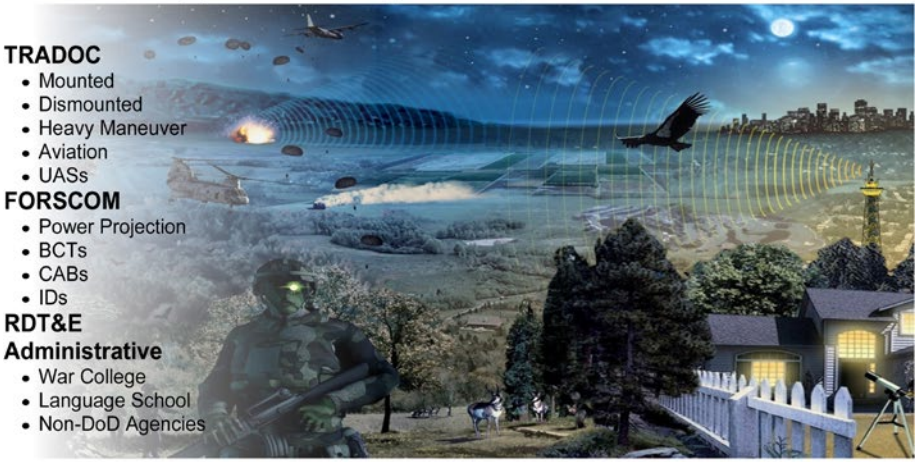
## COMMANDER'S ROLE

- Maintain compliance with laws and regulations and prioritize those requirements over ones with no legal driver.
- Identify and plan accordingly for environmental issues requiring non-environmental funding to ensure legal requirements are funded and met.
- Consider direct mission support for prioritization of resources.
- Review annual project submittal and priorities.
- Identify environmental requirements, forward through command channels, and maintain auditable records.
- Execute the environmental budget to meet critical requirements.

# Enabling Army Readiness in a Complex Environment

**Program Vision:**
Environmental Stewardship that sustains the Army mission

## Provide Support for Complex Requirements/ Customers



**TRADOC**
- Mounted
- Dismounted
- Heavy Maneuver
- Aviation
- UASs

**FORSCOM**
- Power Projection
- BCTs
- CABs
- IDs

**RDT&E**

**Administrative**
- War College
- Language School
- Non-DoD Agencies

**Environmental Officers/ Activity Tenants/ External Partnerships**

**FORCE MULTIPLIERS**

**Train & Equip**

**IMCOM ENVIRONMENTAL WORKFORCE**

*900 CIVILIANS / 750 CONTRACT MANPOWER EQUIVALENTS*

| | | |
|---|---|---|
| Air Quality Specialists | Chemical Engineer | Geologists |
| Archeologists | Civil Engineer | Historians |
| Architects | Environmental Engineer | Horticulturists |
| Biologists | Entomologists | Hydro-geologists |
| Chemists | Environmental Attorneys | Natural Resource Specialists |
| Ecologists | Environmental Scientists | Physical Scientists |
| | Foresters | |

| Environmental Management System | | Operational Controls | |
|---|---|---|---|
| Audits | Internal | External | Regulatory |
| Reviews | Environmental Quality Control Committee | | |

# Enabling Army Readiness in a Complex Environment

IMCOM G4
Environmental Division

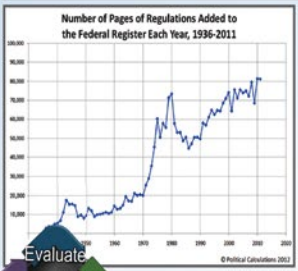
**Program Mission:** Sustain the environment to enable the Army's mission now and provide for the future

"The capability to maintain the required level (intensity) & duration (time) of military operations to achieve the planned objectives or outcomes."
*—AR 700-138 – Army Readiness and Sustainability*

## Navigate the Complex Regulatory Environment

### Environmental Laws

**CERCLA** - Comprehensive Environmental Response, Compensation and Liability Act
**NESHAPS** - National Emission Standards for Hazardous Air Pollutants
**NAGPRA** - Native American Graves Protection and Repatriation Act
**EPCRA** - Emergency Planning and Community Right-to-Know Act
**FIFRA** - Federal Insecticide, Fungicide, and Rodenticide Act
**RCRA** - Resource Conservation and Recovery Act
**ARPA** - Archaeological Resources Protection Act
**AIRFA** - American Indian Religious Freedom Act
**BGEPA** - Bald and Golden Eagle Protection Act
**FGS** - Final Governing Standards (OCONUS)
**NHPA** - National Historic Preservation Act
**NEPA** - National Environmental Policy Act
**TSCA** - Toxic Substance Control Act
**CZMA** - Costal Zone and Marine Act
**SWDA** - Solid Waste Disposal Act
**MBTA** - Migratory Bird Treaty Act
**SDWA** - Safe Drinking Water Act
**ESA** - Endangered Species Act
**CWA** - Clean Water Act
**CAA** - Clean Air Act
**SIKES Act**




### Regulatory Oversight and Enforcement

**EPA** - Environmental Protection Agency
**USFWS** - US Fish and Wildlife Service
**NOAA** - National Oceanographic and Atmospheric Administration
**ACHP** - Advisory Council on Historic Preservation
**State & Local Regulators**
**SHPO** - State Historical Preservation Office
**National Park Service**
**FGS** - Final Governing Standards
**NMFS** - National Marine Fisheries Service

### Impact if Unmanaged

| | | |
|---|---|---|
| Violations | Infrastructure Shut Down | Fines |
| Civil Suits | Criminal Liability | Negative Publicity |
| Restricted Training | Releases to Environment | Personnel Exposure & Health Effects |


## IMCOM Responsibilities

### Range/Training Operations

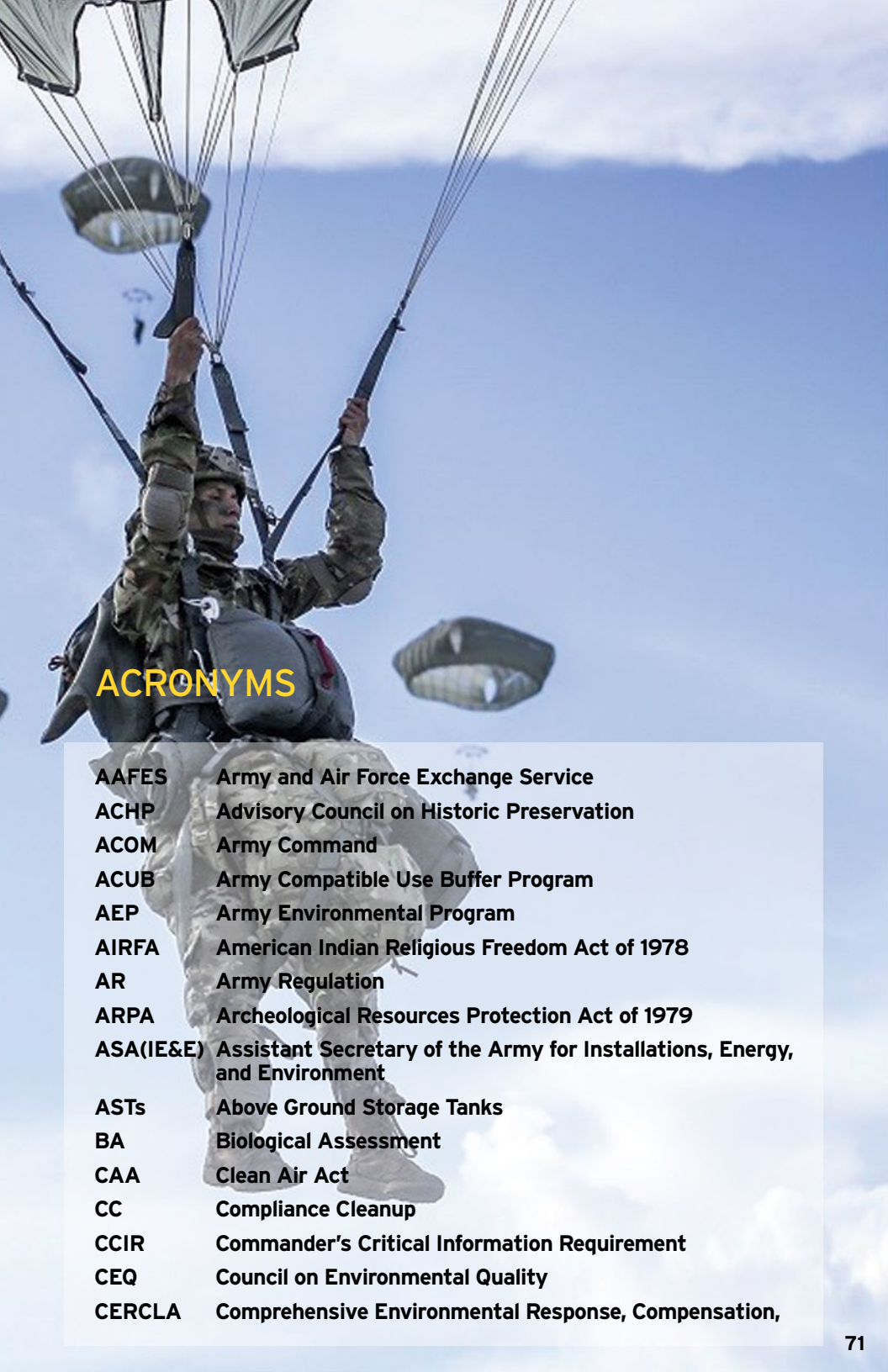
| | | |
|---|---|---|
| **174** Threatened and Endangered Species | **75,000** Actions Annually (MILCON, Stationings, etc) | **13 Million Acres** of Unimproved Lands |
| **3,000** Wildland Fires Annually | **31** Native American Sacred Sites | **1,026** Migratory Birds |
| **189,000 Acres** of Compatible Use Buffers | **12** Treatment, Storage, Disposal Facilities | **1,351** Cleanup Sites |

### Critical Infrastructure

| | | | | |
|---|---|---|---|---|
| **15 Million Acres** of Land Managed | **9,500** Generators | **17** National Historic Landmarks | **72** Integrated Pest Management Plans | **2 Million Tons** of Solid Waste | **4,200 Tons** of Hazardous Materials Annually |
| **7,400 Tons** of Hazardous Waste | **7** Central Energy Plants | **40,000** Boilers | **54,000** Archaeological Sites | **23** Annual Pollution Prevention Efforts | **12** Solid Waste Landfills |
| **31** Waste Water Treatment Plans | **65,000** Storage Tanks | **14,000** Historical Buildings | **266** Drinking Water Systems | **56** Installations with Eagles | **37** Storm Water Permits |

### Environmental Products and Services

| | | | |
|---|---|---|---|
| Permit Fees | Missionscaped Ranges | Long-term Mitigation Measures | Plans, Studies, Inventories and Surveys |
| Education/ Training | Hazardous Waste Storage & Disposal | | Laboratory, Sampling and Monitoring |



# ACRONYMS

| | |
|---|---|
| AAFES | Army and Air Force Exchange Service |
| ACHP | Advisory Council on Historic Preservation |
| ACOM | Army Command |
| ACUB | Army Compatible Use Buffer Program |
| AEP | Army Environmental Program |
| AIRFA | American Indian Religious Freedom Act of 1978 |
| AR | Army Regulation |
| ARPA | Archeological Resources Protection Act of 1979 |
| ASA(IE&E) | Assistant Secretary of the Army for Installations, Energy, and Environment |
| ASTs | Above Ground Storage Tanks |
| BA | Biological Assessment |
| CAA | Clean Air Act |
| CC | Compliance Cleanup |
| CCIR | Commander's Critical Information Requirement |
| CEQ | Council on Environmental Quality |
| CERCLA | Comprehensive Environmental Response, Compensation, |

| | |
|---|---|
| | and Liability Act |
| CFR | Code of Federal Regulations |
| CONUS | Continental United States |
| COS | Chief of Staff |
| CRFC | Conservation Reimbursable and Fee Collection |
| CRM | Cultural Resources Management |
| CTC | Cost-to-Complete |
| CWA | Clean Water Act |
| CX | Categorical Exclusion |
| DA | Department of the Army |
| DA PAM | Department of the Army Pamphlet |
| DCG | Deputy Commanding General |
| DCS G-9 | Deputy Chief of Staff for G-9 aka Deputy Chief of Staff for Installations |
| DECA | Defense Commissary Agency |
| DERP | Defense Environmental Restoration Program |
| DES | Directorate of Emergency Services |
| DLADS | Defense Logistics Agency Disposition Services |
| DMM | Discarded Military Munitions |
| DoD | Department of Defense |
| DoDEA | Department of Defense Education Activity |
| DoDI | DoD Instruction |
| DPW | Directorate of Public Works |
| DRUs | Direct Reporting Units |
| EA | Environmental Assessment |
| EIS | Environmental Impact Statement |
| ELD | Environmental Law Division |
| ENF | Enforcement Order |
| ENVR | A fiscal code used to identify Army environmental program resources aka Management Decision Package or MDEP |
| EO | Executive Order |
| EPA | U.S. Environmental Protection Agency |
| EPAS | Environmental Performance Assessment System |
| EPCRA | Emergency Planning and Community Right-to- Know Act |
| EQCC | Environmental Quality Control Committee |
| ER,A | Environmental Restoration, Army |
| ESA | Endangered Species Act |

| | |
|---|---|
| ESM | Environmental Support Manager |
| ESMP | Endangered Species Management Plan |
| FGS | Final Governing Standards |
| FIFRA | Federal Insecticide, Fungicide, and Rodenticide Act |
| FNSI | Finding of No Significant Impact |
| FY | Fiscal Year |
| GC | Garrison Commander |
| GERB | Garrison Environmental Requirements Build |
| GM | Garrison Manager |
| GPC | Government Purchase Card |
| GSA | General Services Administration |
| HM | Hazardous Materials |
| HMMP | Hazardous Materials Management Program |
| HQDA | Headquarters, Department of the Army |
| HW | Hazardous Waste |
| IAP | Installation Action Plan |
| IAW | In accordance with |
| ICRMP | Integrated Cultural Resources Management Plan |
| ICUZ | Installation Compatible Use Zone |
| IMCOM | U.S. Army Installation Management Command |
| IMCOM G4 | HQ DPW function (includes environment) |
| INRMP | Integrated Natural Resources Management Plan |
| IONMP | Installation Operational Noise Management Plan |
| IPM | Integrated Pest Management |
| IRP | Installation Restoration Program |
| IRT | Installation Response Team |
| ISE | Environmental Division of the Installation Services Directorate in the Office of the Deputy Chief of Staff for Installations aka DCS G-9 |
| ISWMP | Integrated Solid Waste Management Plan |
| ITAM | Integrated Training Area Management |
| JALS | Army Judge Advocate Legals Services Agency |
| LBP | Lead-Based Paint |
| LEPC | Local Emergency Planning Committee |
| LRC | Logistics Readiness Center |
| MBTA | Migratory Bird Treaty Act |
| MC | Munitions Constituent |

| | |
|---|---|
| MCLs | Maximum Contaminant Levels |
| MDEP | Management Decision Evaluation Packages |
| MEDCOM | U.S. Army Medical Command |
| MILCON | Military Construction |
| MMRP | Military Munition Response Program |
| MWR | Morale, Welfare, and Recreation |
| NAGPRA | Native American Graves Protection and Repatriation Act of 1990 |
| NCP | National Oil and Hazardous Substances Contingency Plan |
| NEPA | National Environmental Policy Act |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NMFS | National Marine Fisheries Service |
| NHPA | National Historic Preservation Act of 1966 |
| NOI | Notice of Intent |
| NOV | Notice of Violation |
| NPDES | National Pollution Discharge Elimination System |
| OB/OD | Open Burn/Open Detonation |
| OCONUS | Outside the Continental United States |
| OEBGD | Overseas Environmental Baseline Guidance Document |
| OMA | Operations and Maintenance, Army |
| OSD | Office of the Secretary of Defense |
| OSC | On-Scene Coordinator |
| OSHA | Occupational Safety and Health Administration |
| P2 | Pollution Prevention |
| PAO | Public Affairs Office |
| PCB | Polychlorinated Biphenyl |
| POC | Point of Contact |
| POL | petroleum, oil, and lubricants |
| QDPW | Facility Sustainment, Restoration, and Modernization projects |
| QLOG | Logistic Projects |
| QRP | Qualified Recycling Program |
| QUTM | Energy and Water Conservation Projects |
| RAB | Restoration Advisory Board |
| RCRA | Resource Conservation and Recovery Act |
| REC | Record of Environmental Consideration |
| REPI | Readiness and Environmental Protection Integration |
| SC | Senior Commander |

| | |
|---|---|
| **SDS** | **Safety Data Sheet** |
| **SDWA** | **Safe Drinking Water Act** |
| **SERC** | **State Emergency Response Commission** |
| **SHPO** | **State Historic Preservation Officer** |
| **SOFA** | **Status of Forces Agreement** |
| **SPCC** | **Spill Prevention, Controls, and Countermeasure** |
| **ST** | **Storage Tank** |
| **TES** | **Threatened and Endangered Species** |
| **TRI** | **Toxic Release Inventory** |
| **TSCA** | **Toxic Substances Control Act** |
| **USACE** | **U.S. Army Corps of Engineers** |
| **USAEC** | **U.S. Army Environmental Command** |
| **USAPHC** | **U.S. Army Public Health Center** |
| **USC** | **United States Code** |
| **USFWS** | **U.S. Fish and Wildlife Service** |
| **USTs** | **Underground Storage Tanks** |
| **UXO** | **Unexploded Ordnance** |
| **VENQ** | **A fiscal code used to identify Army environmental program resources aka Management Decision Package or MDEP** |

# NOTES

# NOTES

# NOTES

# NOTES

# FOR QUESTIONS

**Write**

U.S. Army Installation Management Command
ATTN: G4 ENV
2405 Gun Shed Rd
JBSA Fort Sam Houston, TX 78234

**Email**

usarmy.jbsa.imcom-hq.list.g4-env-owner@mail.mil

**Call**

(210) 466-0448, DSN 450-0448
(210) 466-0571, DSN 450-0571

# FOR QUESTIONS

**Write**

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Fort Sam Houston, TX 78234-7588

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(210) 466-1655, DSN 450-1655