



DEPARTMENT OF THE ARMY
DIRECTORATE OF PUBLIC WORKS, FORT CAVAZOS
BUILDING 4612 ENGINEER DRIVE
FORT CAVAZOS, TEXAS 76544-5002

AMIM-CAP-E (200-1g)

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Memorandum of Instruction (MOI) - Environmental Compliance Assessment Team (ECAT) Procedures and Services

1. Reference Fort Cavazos Regulation (FC Reg) 200-1, Environment and Natural Resources, 24 Apr 14.
2. Purpose. To describe procedures and services provided by the Environmental Compliance Assessment Team (ECAT) at Fort Cavazos.
3. Objectives. The ECAT program is designed to help preserve both natural and fiscal resources, and to enhance the installation's ability to support readiness, training, and deployment of military units. To achieve these objectives, the ECAT will:
 - a. Provide all Fort Cavazos units/activities with an assessment of environmental programs at the user level and assist with developing and maintaining superior environmental programs.
 - b. Ensure all operations on Fort Cavazos are performed in a manner that protects human health and the environment in accordance with federal, state, and local regulations.
4. Applicability. The ECAT serves all organizations and contractors assigned, attached, conducting training, or residing within the limits of the Fort Cavazos military installation.
5. ECAT Services:
 - a. Site Assistance Visits (SAV): Training, assistance, and consulting services are provided to all units/activities upon request by contacting the appropriate ECAT representative.
 - b. Routine Motor Pool Drive Through: The ECAT will conduct regular motor pool visits to identify potential non-compliance issues. When discrepancies are identified, the

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ECAT will contact the unit's/activity's Environmental Compliance Officer (ECO) to ensure they are aware of the issue.

c. Courtesy assessments: Units/activities can request to have their environmental programs assessed to give the leadership a status of environmental compliance or assist with developing or improving environmental programs. Courtesy assessments will not be scheduled within 30 days prior to a scheduled formal assessment. The results of a courtesy assessment remain internal to the units/activities and are not sent to the next higher command, Division IG office, or the Directorate of Public Works (DPW) Environmental Division Program Managers.

d. Semi-annual environmental assessments: A comprehensive inspection of an organization's environmental program serves to provide Fort Cavazos leadership with a clear measure of environmental compliance, helps the units/activities to identify and correct environmental compliance issues, and assists the DPW Environmental Division in identifying and correcting systemic environmental challenges across the installation. Semi-annual assessments of the units/activities environmental programs are scheduled through the Commander, Division Chief, Director, Manager, or Contracting Officer's Representative (COR) approximately 6 months prior to the event. The next higher command is also notified. Assessment standards are compiled in a checklist that reflects environmental program requirements as outlined in FC Reg 200-1, Environment and Natural Resources; 40 CFR, Protection of Environment; Fort Cavazos Title V Operating Permit; Fort Cavazos Spill Prevention Control and Countermeasures Plan, and Fort Cavazos Hazardous Waste Management Plan.

e. Follow-up visit: Based on semi-annual assessment outcomes, units/activities may require a follow-up visit to ensure that corrective actions and preventive measures are completed and/or effective.

f. On-The-Spot Assessments: When it becomes clear that the units/activities are making little or no effort to remain in environmental compliance, or when units/activities fail to correct discrepancies that have been identified by the ECAT, a formal on-the-spot assessment may be conducted. This type of assessment will be reserved as the last resort to formally address environmental discrepancies with unit/activity leadership to resolve non-compliance matters. Prior to performing an on-the-spot assessment, documentation of significant non-compliance will be presented to the DPW Environmental Branch Chief for approval. Result of on-the-spot assessments will be added to the Installation Roll-Up.

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g. Installation assessment roll-up: After each semi-annual inspection cycle (Jan-Jun and Jul-Dec), ECAT representatives prepare a status of overall installation compliance, which is submitted to the Fort Cavazos senior leadership.

h. Environmental Program Support: ECAT provides environmental assessment results to DPW Environmental Division Program Managers (PMs) to assist with identifying trends and possible areas of concern for environmental compliance. PMs can use the information provided to create corrective action plans to resolve challenges, or for continual improvement of Fort Cavazos environmental programs.

i. Assessment Documentation: ECAT maintains electronic copies of all written assessment reports, checklists, and follow-up visit documentation that is provided to each assessed unit/activity. Documentation is reviewed by ECAT representatives at the end of each semi-annual cycle to determine current trends or systemic problems.

6. ECAT Semi-Annual Assessment and Roll-up Procedures:

a. Schedule assessments approximately 6 months prior to the event. Assessment dates are sent to the unit/activity Commander, Director, Manager, or COR in their official assessment report at the conclusion of the previous assessment. The next higher command is also notified at that time. Leadership may request to adjust dates if there is a scheduling conflict, up to 30 days prior to the assessment. Consideration for adjusting assessment dates within 30 days will be given for emergency situations.

b. Conduct site assistance visits or courtesy assessments to units/activities upon request, up to 30 days prior to a scheduled audit.

c. Contact unit/activity approximately 30 days prior to assessment date to confirm the meeting date, time, and place.

d. Conduct semi-annual assessment of unit/activity environmental programs. In the event unit personnel fail to participate in the scheduled assessment after it has been confirmed, the assessor will conduct the assessment without unit/activity escort.

e. Provide informal in-brief to unit/activity personnel present explaining the scope of the assessment.

f. Provide informal out-brief to unit/activity personnel present outlining discrepancies or observations and offering guidance or assistance as needed.

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g. Provide a formal written assessment report and checklist to the unit/activity leadership (Commander, Director, Manager, or COR). Copies of the assessment report are also sent to the next higher command, the Fort Cavazos and Division IG office, and DPW Environmental Division Program Managers. Other agencies such as the Garrison Safety Office or Industrial Hygiene may be notified when necessary. Formal assessment reports will include:

(1) Unit/activity assessed, assessment date, and ECAT representative conducting assessment.

(2) Instructions on preparing the required Reply By Memorandum (RBM), if needed, which includes identifying root causes, corrective actions with date of completion, and preventive measures for each discrepancy identified, as well as signatory requirements and a due date. A RBM is not required for units/activities that achieve a score of 100%.

(3) A detailed list of discrepancies identified during the assessment.

(4) An overall score/rating (green 92-100, amber 76-91, red 75 or below).

(5) Notification as to whether a follow-up visit will be required.

(6) A copy of the completed checklist with the overall assessment score, score per category, identified discrepancies, unit/activity representative(s) who participated in the assessment, next assessment date/time, and RBM due date.

h. Once received, the RBM will be reviewed to ensure the root cause of each discrepancy has been adequately addressed by listed corrective and preventive actions. If not adequately addressed, the RBM will be returned for corrections. If a follow-up visit is required by ECAT or requested by a unit/activity, it will be scheduled with the unit/activity based on the timeline given for corrective actions. If a unit/activity fails to submit the RBM by the due date, a memorandum will be sent from the Chief, Environmental Division, to the appropriate Commander, Director, Manager, or COR with a suspense of 10 working days. Failure to submit is also reported on the installation compliance roll-up to senior leadership.

i. Conduct follow-up visit if required or requested. Assist unit/activity with corrective actions or preventive measures, as needed.

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j. Prepare and present to senior leadership a roll-up of assessment results at the end of each assessment cycle for all units/activities on the installation.

k. ECAT Incentive Programs:

(1) Environmental Stewardship Award:

(a) Purpose: Recognize organizations and individuals for exemplary environmental performance.

(b) Criteria: Awards are based on performance by individuals and units/activities that go beyond minimum requirements and exhibit the highest level of commitment to Fort Cavazos' environmental program. Unit/activity must meet the following specific criteria to be eligible for the award:

(i) Receive a green rating on their semi-annual assessment.

(ii) All corrective actions completed and RBMs returned to DPW Environmental within stated time frames.

(iii) Exhibit a strong commitment to maintaining a high level of environmental stewardship and supporting the installation's environmental program.

(iv) Awarding: Selected units/activities and individuals will receive a Certificate of Achievement signed by the Director of Public Works and be recognized at the quarterly Phantom Warrior Award Ceremony.

(2) Annual Assessment Program:

(a) Purpose: Recognize units/activities and individuals for exemplary environmental performance.

(b) Criteria: A unit/activity may be eligible to move from the semi-annual assessment program to an annual assessment schedule if it is determined that they can maintain a high level of environmental performance. ECAT will assess organizations and determine eligibility based on the following criteria:

(i) Three consecutive green ratings (score 92 or higher) on semi-annual assessments.

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(ii) Consistently maintaining a high level of environmental performance throughout each assessment cycle, based on routine observations.

(iii) Exhibit commitment by the entire organization to environmental performance.

(iv) Awarding: A Memorandum for Record documenting this achievement will be provided to the unit/activity leadership and filed with the ECAT assessment documentation. The annual assessment status will remain in effect until such time as the unit/activity fails to maintain a green rating or has a significant drop in environmental performance during an assessment cycle.

7. ECAT Contact information:

- a. ECAT Team Leader: (254) 287-9105
- b. 13 ESC and Separate Brigades (254) 287-9103
- c. 1CD (254) 287-9604

8. This MOI supersedes the previous MOI dated 5 Jul 17 and will remain in effect until superseded or rescinded.

BRIAN L. DOSA
Director of Public Works

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