

DEPARTMENT OF THE ARMY U.S. ARMY INSTALLATION MANAGEMENT COMMAND HEADQUARTERS, UNITED STATES ARMY GARRISON FORT LEE 3312 A AVENUE, SUITE 208 FORT LEE, VA 23801-1818

IMLE-ZA

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## MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Fort Lee Pollution Prevention Policy

1. References.

a. 45 Code of Federal Regulations (CFR) 74.16, Resource Conservation and Recovery Act (RCRA), Section 6002

b. 32 CFR 651 National Environmental Policy Act (NEPA), Subpart B

c. Department of Defense (DoD) Instruction 4715.17 Environmental Management Systems, April 2009

d. Army Regulation (AR) 200-1, Environmental Protection and Enhancement, 13 December 2007

2. Purpose. To establish policy guidelines for Pollution Prevention (P2) at Fort Lee, Virginia.

3. Discussion. The Army's P2 policies originate in legislation enacted by United States Congress. However even without requirement by law, P2 is necessary to ensure good stewardship of the land entrusted to Fort Lee as well as the health and safety of those who live and work on and near the installation. Fort Lee is committed to protecting the environment in all of our missions and activities, with P2 as the foundation for reducing or eliminating generation of waste through source reduction, process improvement, waste minimization, product substitution or other methods. This policy encompasses air, water, solid and hazardous waste streams.

4. Policy Requirements.

a. All personnel living or working on the installation will seek to reduce Fort Lee's environmental impact by researching and exploring new ways to prevent pollution to the greatest extent possible, consistent with cost, performance, availability, and safety considerations. Detailed responsibilities of personnel to this effect are outlined in the P2 plan.

b. Take environmental considerations into account as early as possible during the acquisition-planning and decision-making processes.

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c. When implementing P2 methods and technologies, care will be taken to not shift risk from one part of a process to another or from one environmental media to another.

d. Fort Lee commanders and management must be fully committed to P2 and other waste reduction efforts. This means giving priority to sustained compliance with all environmental laws, focusing efforts on preventing pollution at the beginning of processes, and diligently pursuing funding to implement P2 initiatives where technically and financially feasible.

5. Policy Components.

a. P2 Plan: The P2 Plan provides information and suggestions for initiatives and technologies, but must be kept up-to-date with changing technologies and Fort Lee activities. The current P2 plan is kept online at the EMD Share-Point site: <u>https://army.deps.mil/army/cmds/imcom\_usag15/flg/dpw/emd/SitePages/Forms/AllPages.aspx</u>

b. P2 Coordinator: The P2 Coordinator works at the Environmental Management Division (EMD), Directorate of Public Works (DPW) and should be used as a resource for further information and research. To contact the P2 Manager phone (804) 734-3766, or email, john.r.allen180.civ@mail.mil

c. Environmental Quality Control Committee (EQCC): The EQCC is chaired by the commander. The EQCC works to support the installation mission in all environmental issues.

6. Each organization, resident command, and agency will use the P2 Plan and P2 Coordinator to determine the best methods for implementing P2 projects in accordance with this policy. Tracking of effectiveness of P2 projects shall be reported to the P2 Coordinator. The P2 Coordinator will report trends and information to the EQCC.

7. Proponent for this policy is Fort Lee Directorate of Public Works Environmental Management Division at (804) 734-5014.

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