



**DEPARTMENT OF THE ARMY
U.S. ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON FORT LEE
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FORT LEE, VA 23801-1818**

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MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Hazardous Materials Management Program (HMMP) Policy

1. References.

- a. Army Regulation 200-1, Environmental Protection and Enhancement, 13 December 2007
- b. Department of Army Pamphlet 710-7, Hazardous Materiel Management Program, 25 June 2013
- c. Installation Management Command, HMMP Implementation Guidance, IMPW-SE, 10 May 2016
- d. FRAGO 01 to Operations Order 14-114
- e. Department of the Army Government Purchase Card Operating Procedures, 23 February 2012
- f. Mission and Installation Contracting Command Government Purchase Card Operating Procedures, 19 October 2012
- g. Fort Lee HMMP Plan, February 2018

2. Background. AR 200-1 requires that Garrison Commanders implement an installation-wide Hazardous Materials Management Program (HMMP) and hold tenant units accountable for complying with the policies and standards of the installation and ensure that applicable environmental requirements are incorporated into all procurement actions.

3. Discussion. To provide a cost effective solution for the management for all Hazardous Materials (HM) while satisfying legal requirements, IMCOM has instructed all Garrison organizations and tenant activities to comply with the requirements to achieve Full Operational Capability (FOC) in Enterprise Environmental Safety and Occupational Health – Management Information System (EESOH-MIS) data tracking system.

4. Policy Requirements.

- a. All HM must be procured through the standard Army supply systems (i.e., Global Combat Support System-Army) to the maximum extent practicable and must be tracked within EESOH-MIS by the purchaser.

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- b. The purchase of HM with Government Purchase Card (GPC) is generally prohibited, but can be approved on a case-by-case basis by the Garrison Commander or their designated representative.
 - c. Items procured by other than GCSS-A must be coordinated through the Hazardous Material Control Center (HMCC) for EESOH-MIS inventory control and bar coding and is the responsibility of the purchaser.
 - d. All Garrison staff, Army Sustainment Command (ASC) subordinate commands and tenant activities are to be fully trained and utilizing EESOH-MIS and associated equipment for HM life cycle management.
 - e. All HM must be listed on an Authorized User List (AUL) in EESOH-MIS and approved by the Fort Lee HMMP reviewers/approvers located at the Directorate of Public Works (DPW) Environmental Management Division, Garrison Safety Office, and the Preventive Medicine Department of Kenner Army Community Clinic.
 - f. The HMCC as configured in EESOH-MIS and outlined in the Fort Lee HMMP is the centralized receiving and issuance point for all HM.
 - g. Any unit or activity whose actions display an associated negligence and/or mismanagement of the supply requisitioning process creating excess quantities of HM which may become HW shall be directly charged for disposal or required to reimburse the Fort Lee Garrison.
 - h. GPC holders improperly purchasing HM (not IAW the Fort Lee HMMP) may face financial liability, administrative and/or punitive action by the Garrison Commander and/or the Agency Organization Program Coordinator (AOPC) in the Directorate of Contracting. Penalties may include the suspension or revocation of credit card privileges.
5. This policy applies to all Army organizations and agencies, tenants, and contractors located on the Fort Lee installation fence-to-fence, subject to terms of installation services agreements and/or contracts.
6. This policy is effective after phase III, EESOH-MIS data base training has been completed 9 March 2018.
7. The proponent of this policy is Fort Lee Directorate of Public Works Environmental Management Division at (804) 734-5071.


HOLLIE J. MARTIN
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Commanding

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