



DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT GREGG-ADAMS
3312 ADAMS AVENUE, SUITE 208
FORT GREGG-ADAMS, VIRGINIA 23801-1818

AMIM-GAP-E (40-905 2-3f)

MEMORANDUM FOR Gregg-Adams Key Personnel

SUBJECT: Fort Gregg-Adams Pollution Prevention Policy 24-01

1. References:

- a. 45 Code of Federal Regulations (CFR) 74.16, Resource Conservation and Recovery Act (RCRA), Section 6002
- b. AR 200-1, Environmental Protection and Enhancement, December 2007
- c. AR 420-1, Army Facility Management, March 2009
- d. AR 420-49, Facilities Engineering, September 2005
- e. Executive Order 13834, Efficient Federal Operations, May 2018
- f. Installation Management Command, HMMP Implementation Guidance, IMPW-SE, May 2016
- g. Department of the Army Government Purchase Card Operating Procedures, February 2012
- h. Mission and Installation Contracting Command Government Purchase Card Operating Procedures, October 2012
- i. Fort Gregg-Adams HMMP Plan, February 2018
- j. 40 CFR 247, Comprehensive Procurement Guidelines for Products Containing Recovered Materials
- k. The Federal Acquisition Regulation, Subparts 23.1, 23.2, 23.4, and 23.7
- l. Department of the Army Memo dated 22 November 2006, Establishment of the Army Green Procurement Program

2. Purpose: To provide guidance on Fort Gregg-Adams' Pollution Prevention (P2), Recycling, Hazardous Materials Management, and Green Procurement Programs

3. Applicability: This policy applies to all Service Members, Civilians, and contractors assigned to, working on, and/or visiting Fort Gregg-Adams.

4. Policy: All personnel must prevent pollution and recycle to the greatest extent possible, consistent with cost, performance, availability, and safety considerations. Leaders will focus on preventing pollution and minimizing landfilled waste. Participation in the Fort Gregg-Adams Pollution Prevention, Recycling, Green Procurement, and Hazardous Materials Management Programs is mandatory. All tenant activities must comply with the Hazardous Materials Management Program (HMMP) and achieve Full Operational Capability (FOC) in the Enterprise Environmental Safety and Occupational Health – Management Information System (EESOH-MIS) data tracking system. Any unit or activity whose actions display an associated negligence and/or mismanagement of the supply requisitioning process creating excess quantities of Hazardous Material (HM) or Hazardous Waste (HW) shall be directly charged for disposal or required to reimburse the Fort Gregg-Adams Garrison. Government Purchase Card (GPC) holders purchasing HM not in accordance with the references herein may face penalties including suspension or revocation of credit card privileges and/or employee disciplinary actions.

5. Discussion: Fort Gregg-Adams is committed to achieving Department of Defense (DoD) solid waste reduction goals. The current objective for Non-Hazardous/Municipal Solid Waste is 40% diversion from the landfill. The Construction and Demolition (C&D) solid waste objective is 60% diversion from the landfill. The recycling program reflects Gregg-Adams' commitment to reaching these goals. All personnel shall meet the mandatory requirements for the procurement of recycled content, bio-based, and energy-efficient products when conditions of price, performance, and availability are met. The determination of unreasonable price will be based on life cycle costs of competing products. Personnel shall:

a. Prevent waste by purchasing, using, and generating less. Avoid buying in bulk if the quantity needed is minimal. Saving costs upfront on the purchase of HM leads to increased costs for the disposal of hazardous waste.

b. Recycle all recyclable materials.

c. Purchase items made from and packaged in bio-based, recycled and/or sustainable materials. Seek alternatives to hazardous materials. When purchasing a designated product, the buyer must purchase a green product unless they need an exception based on price, performance, or availability. Lists of designated products within each preference program are available at the following websites:

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(1) Bio-based products designated by the U. S. Department of Agriculture
<http://www.biopreferred.gov/BioPreferred/faces/pages/ProductCategories.xhtml>

(2) Energy efficient products designated by the U.S. Department of Energy
[Department of Energy](#)

d. Random recycling, HM, and GPC audits will be performed to check progress. Compliance reports will be sent to facility managers and appropriate chain of command.

e. All HM shall be procured through the standard Army supply systems (i.e. Global Combat Support System-Army (GCSS-A)) to the maximum extent practicable and must be tracked within EESOH-MIS (<https://eesoh.cce.af.mil/eesoh/portal/home.esoh>) by the purchaser. Purchasing HM with a GPC is generally prohibited without Garrison Commander approval.

f. Items not procured with GCSS-A shall be coordinated through the Hazardous Material Control Center (HMCC) for EESOH-MIS inventory control and bar coding. Obtaining approval prior to purchasing and bar coding is the purchaser's responsibility.

g. All HM must be listed on the Authorized Use List (AUL) in EESOH-MIS and approved by the Fort Gregg-Adams HMMP reviewers (i.e. DPW-EMD, Garrison Safety Office, and Preventive Medicine Department of Kenner Army Health Clinic).

h. All product procurement shall utilize the following sources (shown in order of preference):

(1) LRC Free Issue (EESOH-MIS or Building 6212)

(2) Base Supply Store / VIB (Building 7121, (804) 862-6232)

(3) GSA Advantage! [Welcome to GSA Advantage!](#)

(4) DOD FedMall ([https://https://www.dla.mil/Info/FedMall.aspx](https://www.dla.mil/Info/FedMall.aspx))

(5) Nongovernment supply sources

6. Program Components: Recycling Program. All organizations on Fort Gregg-Adams serviced by the installation recycling/refuse contract are provided recycling containers per the following guidelines. Administrative and office areas are provided 96-gallon green portable containers and 7-gallon blue deskside containers. The 96-gallon recycling containers can be requested through the recycling contracting officer representative (COR) at (804) 734-3166. The 7-gallon blue deskside recycling containers can be requested through the Directorate of Public Works (DPW) Environmental Management Division (EMD). Office staff empty their 7-gallon containers into the 96-gallon green containers as needed. The Fort Gregg-Adams recycling contractor picks up the 96-gallon green recycling container weekly, and in some high-volume recycling areas, twice per week (Enclosure 1). Both sizes of containers in administrative/office areas will be used for:

- a. PAPER: All office paper not shredded, envelopes, folders, brown bags, magazines, catalogs, newspaper.
- b. CARDBOARD: All cardboard boxes should be broken down and placed in a cardboard dumpster (green 8-yard container with a narrow opening). If your facility does not have a cardboard dumpster nearby, flattened cardboard may be placed by green 96-gallon recycling containers.
- c. METAL: All aluminum soda cans, food cans, and miscellaneous metals – rinsed clean/uncontaminated.
- d. PLASTIC: Drink containers, food containers, and all plastic marked with #1 - #5 symbols - rinsed clean/uncontaminated.
- e. GLASS: Drink containers, food containers, and any miscellaneous glass – rinsed clean/uncontaminated.

7. Industrial or bulk recycling needs are met with roll-off/special containers (30 cu. yd.) upon request through the DPW Operations COR of Fort Gregg-Adams' Refuse and Recycling Contract at (804) 734-3166. Bulk recycling is also available at the Fort Gregg-Adams Recycling Center (Enclosure 2) to collect the following items that are not on a hand receipt:

- a. WOOD: Clean, unpainted scrap wood or wooden pallets.
- b. YARD DEBRIS: Leaves, branches, grass clippings.
- c. FURNITURE: Fully wood or metal. No couches or upholstered furniture.

d. ELECTRONICS: Must not contain hazardous components such as mercury switches or lithium batteries.

e. APPLIANCES: Refrigerators must have certification of refrigerant evacuation.

8. Dining Facilities must rinse and recycle all plastic and glass containers. Cardboard must be flattened and placed in cardboard-specific dumpsters. All food waste must be processed through the facility's dehydrator or digester. Dehydrated food waste must be kept dry and free of trash in designated containers.

9. Specialty recyclable items are accepted through EMD at (804) 734-3811 or Logistics Readiness Center (LRC) at (804) 734-4481. DO NOT place the listed items in trash or recycling containers. Call (804) 734-3166 or (804) 734-5123 for additional guidance on how to recycle the following items:

- a. Used oil & oil filters (EMD)
- b. Tactical tires (LRC)
- c. Brass cartridge cases (LRC)
- d. Ink/Toner Cartridges (Gregg-Adams Supply Store, Bldg. 7121)
- e. Florescent light bulbs (EMD)
- f. 55 gal Drums – empty (LRC)
- g. Batteries – Lead Acid, Ni Cadmium, Metal Hydride, & Lithium (EMD)
- h. Refrigerators (LRC)
- i. Hand Receipt Items (DLA Disposition Services, Bldg. 6243)

10. Non-Recyclable Products. The following items are currently NOT recyclable at Fort Gregg-Adams and should be placed in trash containers:

- a. Plastics with recycling symbols 6-8
- b. Styrofoam

- c. Soiled paper products
- d. Chip bags
- e. Carbon paper
- f. Foil-backed/wax paper (snack wrappers)
- g. Food items (DFACs must run all food waste through dehydrators or digesters)
- h. Alkaline batteries (AAAA - D)
- i. Materials with oily or food residue
- j. Shredded office paper

11. Solid Waste Action Team (SWAT). The installation SWAT oversees and promotes the recycling program. The Garrison Commander (GC) chairs the SWAT. The SWAT members are specified in the SWAT Charter (Enclosure 3). The SWAT meets at least three times per year to establish installation goals, objectives, and incentive programs. It also reviews eligible projects and votes on QRP fund distribution.

12. Qualified Recycling Program (QRP). Fort Gregg-Adams QRP processes and sells certain recyclables with the funds being returned to the United States Treasury and deposited into a QRP Fund account. This procedure is in accordance with the Qualified Recycling Program Handbook dated May 2020, prepared by U.S. Army Assistant Chief of Staff Installation Management (ACSIM). Funds may be used per the following guidance:

- a. Proceeds from the sale of recyclable materials at the installation shall be credited to funds for operation and maintenance costs associated with processing recyclables and improving the recycling program on the installation.

- b. After the operation and maintenance of the recycling program is funded, not more than 50% of the remaining funds may be utilized at the installation for pollution abatement, energy conservation, and occupational safety and health activities.

- c. Priority of selecting utilization of funds will be voted upon Environmental Compliance/Pollution abatement (40%), Energy Conservation (20%) Life, Health, and Safety (20%) and Installation Sustainability (20%).

d. The remaining balance may be transferred to the installation's non- appropriated morale and welfare fund, to be used for any morale and welfare activity.

13. Responsibilities: Fort Gregg-Adams Organizations, Units, and Other Agencies. Develop activity-specific recycling programs, procure the right amount, with no excess, of materials needed, procure green products when available, and appoint recycling coordinators. Conduct an annual "all hands" recycling training. All personnel purchasing, using, and storing HM shall be fully trained and utilize EESOH-MIS for HM life cycle management. Training and frequently asked questions for EESOH-MIS are available through DPW-EMD. All personnel involved in the procurement of products and services shall maximize the use of green products. All specification writers, government purchase card holders, contracting officers, and contracting officer representatives shall attend green procurement awareness training.

a. DPW-Operations and Maintenance (O&M) Division. The DPW O&M Division will manage the installation solid waste contract. Recycling containers and education materials will be provided through the contractor on acceptable commodities.

b. Logistics Readiness Center (LRC) - Inspection/Classification Section. LRC coordinates with DLA and collects materials for reutilization, resale, recovery, and/or recycling. When applicable, LRC will reissue materials instead of allowing units to order the same materials new. LRC will report to EMD monthly the amount of materials collected, recycled, repurposed, and disposed of under their support. LRC is the centralized receiving and issuing point for all HM and maintains the AUL.

c. Mission and Installation Contracting Command (MICC). The MICC shall appoint an individual to serve as the co-chair of the Green Procurement Team and provide green procurement awareness training. Contracting Officers shall maximize green procurement and include the Environmental Special Conditions (ESC) and Environmental Policy in all contracts. The MICC shall randomly audit GPC transactions to ensure HM is properly procured and green products were purchased to the maximum extent possible.

d. Hazardous Material Control Center (HMCC). The HMCC shall coordinate with the DPW-EMD to increase the number of green products stocked and provide support to HM purchases registering and using EESOH-MIS.

e. DPW-Environmental Management Division (EMD). The DPW EMD will oversee the solid waste and recycling program as outlined in reference 1a. Additionally EMD will compile solid waste collection data in the Solid Waste Annual Reporting (SWAR) web-system, which is reported to Headquarters Department of the Army. EMD will also

assist in research and marketing of recyclable materials and P2 projects and reviewing submittals to the AUL.

f. Tenant Agencies with Separate Solid Waste Contracts. Some organizations such as the Army and Air Force Exchange Service (AAFES) and Defense Commissary Agency (DeCA) operate separate components of a solid waste program, (e.g. cardboard collection). These agencies will report to EMD at least semi-annually the amount of materials recycled from their organizations.

g. SWAT. The SWAT establishes installation objectives and targets to meet recycling and solid waste goals. The SWAT identifies where QRP funds are utilized.

h. HMMP Reviewers. Members from DPW-EMD, Industrial Hygiene department of Kenner Army Health Clinic, and Garrison Safety Office shall review HM Safety Data Sheets at the request of tenants prior to tenant purchase and approve materials for the AUL.

i. Garrison Commander (GC). The GC approves QRP-funded projects. The GC shall ensure that all tenants participate in the mandatory programs and all regulations and policies are followed.

14. Points of Contact:

a. Pollution Prevention and Qualified Recycling Program Manager may be contacted at (804) 734-3760 or (804) 734-5123.

b. LRC Accountable Officer may be contacted for HMCC information at (804) 734-5246.

c. MICC GPC Program Coordinator may be contacted for Green Procurement information at (804) 734-3045.

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15. The POC for this action is Mr. Quay Jones at 804-734-5019 or
quay.b.jones.civ@army.mil

3 Encls

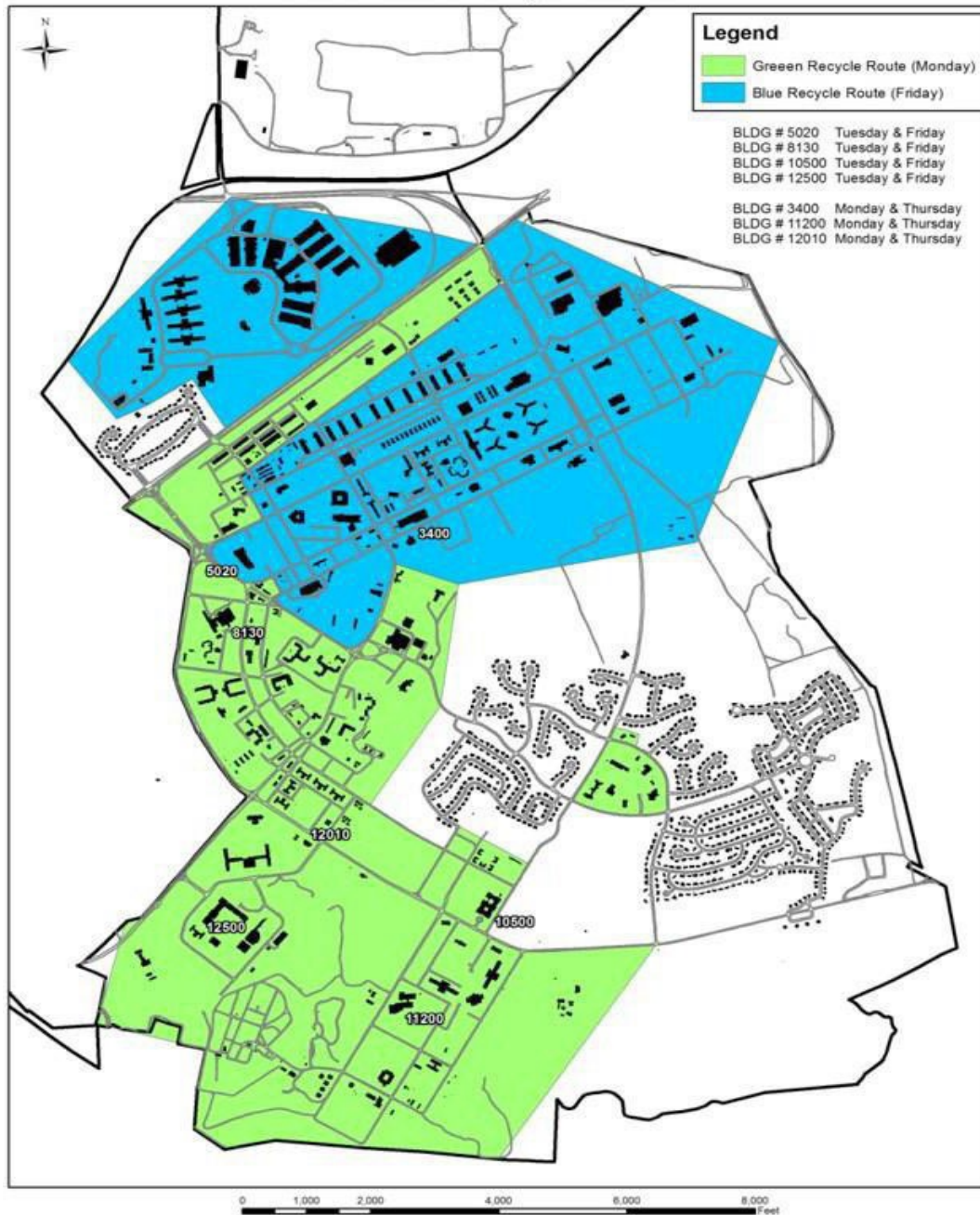
1. 96 Gallon Recycle Route
2. Recycling Center Location
3. Solid Waste Action Team (SWAT)
Charter

JAMES D. HOYMAN
COL, EN
Commanding

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96 Gallon Recycle Route



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Fort Gregg-Adams Recycling Center

